

SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Suffolk County Council's Deadline 4 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



Revision Summary

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Description of Revisions

Rev	Page	Section	Description
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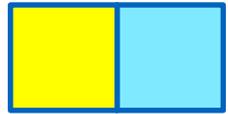
Glossary of Acronyms

BMT	British Maritime Technology
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
dDCO	Draft Development Consent Order
EA1N	East Anglia ONE North
EA2	East Anglia TWO
ExA	Examining Authority
HDD	Horizontal Directional Drill
HGV	Heavy Goods Vehicle
LHA	Local Highway Authority
LLFA	Lead Local Flood Authority
OCoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
PCTMP	Port Construction Traffic Management Plan
PPA	Planning Performance Agreement
PRoW	Public Rights of Way
PTP	Port Travel Plan
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archeology Service
SoCG	Statement of Common Ground
SPR	ScottishPower Renewables
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
TCo	Transport Coordinator
WSI	Written Scheme of Investigation



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission plc
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.



1 Introduction

1. The Applicants' responses to comments received from Suffolk County Council (SCC) for the East Anglia ONE North project and the East Anglia TWO project ('the Projects') are provided in **section 2** below for the following topics:
 - Public Health
 - Archaeology
 - Flood Risk
 - Public Rights of Way (PRoW)
 - Traffic and Transport
2. A number of documents referred to in the Applicants' responses are currently being updated and will be submitted later in the Examination process. This has been specified as appropriate in the Applicants' responses.
3. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

2 Comments on SCC' Written Representations

2.1 Public Health

ID	Written Representation	Applicants' Comments
Statement of Common Ground		
1	2.1 In Section LA-11.21 of the SoCG there doesn't seem to be an acknowledgement of the need for iterative dialogue with the local community around the perceived risks from the site – so from a Public Health perspective there are concerns around that aspect.	Noted. The Applicants will explore this matter with SCC and update the SoCG to reflect any agreement reached.

2.2 Archaeology

ID	Written Representation	Applicants' Comments
Draft DCO		
1	<p>1.1 Comments previously provided by SCC on the revised draft Development Consent Order with regards to archaeological requirements (SCC LIR appendix 2) have not been taken on board within the revised draft DCO. SCC therefore remain unable to fully support the wording of draft DCO requirements 19 and 20. SCC would advise that previous comments need to be addressed in order to ensure that the requirement wording is clear and robust.</p>	<p>The Applicants will update requirements 19 and 20 of the draft DCO (to be submitted at Deadline 5, 3.1) in order to address Suffolk County Council's (SCC) comments.</p> <p>The updated text of Requirement 19 addresses all of SCC's comments with the exception of the request to include reference to the Pre-commencement Archaeology Execution Plan being in accordance with the Outline WSI. The Applicants do not consider it appropriate to include reference to the Outline WSI in the context of the Pre-commencement Archaeology Execution Plan.</p> <p>The updated text of Requirement 20 addresses all of the comments raised by SCC.</p> <p>The updated requirements can be found in the draft DCO submitted at Deadline 5.</p>
2	<p>1.2 Requirement 19 does not at present fully make accommodation for archaeology to be investigated in advance of, or alongside other pre-commencement works (such as access or ecological mitigation). However, the need for this is set out and acknowledged in the OPCAEP. The requirement as proposed also does not explicitly require that pre-commencement works are undertaken in accordance with the principles set out in the outline WSI.</p>	<p>Requirement 19 has been updated in order to cover intrusive pre-commencement works. The updated requirement can be found in the draft DCO submitted at Deadline 5.</p>
3	<p>1.3 Requirement 20 does not at present clearly reflect the likely stages of archaeological work.</p>	<p>The relevant stages of archaeological work will be set out within the WSI which requires to be approved by SCC and requirement 20 has been updated to refer to stages as request by SCC.</p>

ID	Written Representation	Applicants' Comments
8.5 Outline Written Scheme of Investigation Archaeology and Cultural Heritage (Onshore)		
4	3.2 Section 6.4 and Para 99 and Para 116: This should set out the need for completion of the earthwork survey to cover areas identified as inaccessible or only part surveyed on Illustration 1 of document ExA.AS-15.D1.V1SPR (Deadline 1 Submission - Onshore Archaeology Earthworks Report - Rev-01).	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, these sections will be updated with the following:</p> <p><i>It is acknowledged that completion of the earthwork survey to cover areas identified as inaccessible or only part surveyed is required and is currently under consideration by SPR in terms of optimum timeframe and access.</i></p>
5	3.3 Paragraph 102: This revised wording of this paragraph still undermines the whole WSI and is not in the spirit of the Outline CoCP, which is about safe delivery with consideration for control measures. Health and Safety is of paramount importance, but the paragraph needs revising to say that the aims of the archaeological project, as dictated by sector specific guidance, will be met through projects that are informed by health and safety at all times. This may involve developing approaches and working practices such as stepping and shoring and may involve solutions to be developed to safely investigate archaeological remains to fulfil the WSI, proportionate to the significance of those remains. Where conflict between Health and Safety and progressing the archaeological project is identified, every effort should be made by the client, in discussion with the archaeological contractors and SCCAS, to identify a safe way of completing the archaeological investigations to appropriate standards.	<p>The revised wording for this paragraph has been taken directly from the Chartered Institute for Archaeologists standard and guidance for archaeological excavation. However, to address SCCAS' recurring comment on this front further wording within the next update of the Outline Written Scheme of Investigation (Onshore) (at Deadline 6) will be added. This will be done by way of an additional paragraph incorporating and addressing the concerns expressed.</p>
6	3.4 Paragraph 110: This should make clear that additional trenching is required across the whole scheme, not targeted on positive geophysical results with some sampling of apparent blank areas. A full and systematic	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added in this regard.</p>



ID	Written Representation	Applicants' Comments
	<p>survey will be required across the scheme to ground-truth the data and cover any shortfalls in the geophysical technique.</p>	
7	<p>3.5 Paragraph 111: This section also needs to include the following details</p> <ul style="list-style-type: none"> o Trenches machining should be undertaken under the supervision of a suitably qualified archaeologist. o Sampling strategies during trenched evaluation need to be expanded upon and should reflect those set out in the SCC standard requirements trial trenched evaluation document 2020 All archaeological features encountered during trenched evaluation should be sampled, unless otherwise agreed with SCC. https://www.suffolk.gov.uk/assets/cultureheritage-and-leisure/suffolk-archaeological-service/SCCAS-TrenchedArchaeological-Evaluation-JAN-2021.pdf. o A statement regarding dealing appropriately with any human remains encountered is needed. o Provision for metal detecting (by a suitably experienced metal detectorist) to be undertaken as part of the trial trenched evaluation should be made. o Trenches will not be backfilled until these have been viewed and signed off by SCCAS. 	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added in this regard.</p>
8	<p>3.6 Paragraph 122: This should state that if for any reason an SPE needs to be undertaken in conjunction with mobilisation for construction, construction will hold off until archaeological work is completed.</p>	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added.</p>
9	<p>3.7 Paragraph 125: This should set out that a toothless bucket must be used.</p>	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added.</p>



ID	Written Representation	Applicants' Comments
10	<p>3.8 Paragraph 127: The sampling strategy should be sufficient to understand the site and significant and complex features such as structural remains, burials and kilns will require full excavation as per the SCC standard requirements for archaeological excavation document (2020). https://www.suffolk.gov.uk/assets/culture-heritage-and-leisure/suffolkarchaeological-service/SCCAS-Requirements-for-Archaeological-ExcavationJAN-2021.pdf</p>	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording and bullet points will be added in this regard.</p>
11	<p>3.9 Paragraph 128: Metal detecting should be undertaken across mitigation areas prior to, during and after stripping, with spoil also scanned.</p>	<p>Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added.</p>
12	<p>3.10 The SPE section should also set out the following</p> <ul style="list-style-type: none"> o Parameters for excavations on sandy soil – sites should not be left open too long on the one hand and large areas should not be stripped, whilst at the same time work should not be too piecemeal. o Excavation plant movement should be restricted over stripped areas. o A statement regarding dealing appropriately with any human remains encountered is needed. o Further detailed methodologies regarding recording techniques, smallfinds, policy and treasure will need to be included in any site-specific mitigation WSIs. 	<p>Further wording aligned to these comments will be added within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6. The additional wording will be in the context of this being an Outline WSI.</p>
13	<p>3.11 Section 10.2: Although the exact excavation sampling strategy for SMS areas will be determined following the initial strip, all recording methodologies as required for SPE will still apply and so should be included in this section. Further detailed methodologies regarding recording techniques, finds, small-finds policy, human remains, and treasure will need to be included in any site-specific mitigation WSIs.</p>	<p>Further wording aligned to these comments will be added within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6. The additional wording will be in the context of this being an Outline WSI.</p>



ID	Written Representation	Applicants' Comments
	Provision for metal detecting (by a suitably experienced metal detectorist) to be undertaken as part of any SMS works should be made. The need for reporting also needs to be set out.	
14	3.12 Section 10.3: Details of appropriate recording methodologies should also be included in the section in relation to archaeological monitoring. Further detailed methodologies regarding recording techniques, finds, small-finds policy, human remains, and treasure will need to be included in any site-specific mitigation WSIs	Further wording aligned to these comments will be added within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6. The additional wording will be in the context of this being an Outline WSI.
15	3.13 Paragraph 148: This section needs to be clearer with regards to the fact that whilst excavation depths will be determined by the specifics of development works in these areas and not archaeological levels, that the monitoring archaeologist would need to be present during all groundworks taking place within agreed archaeological monitoring areas and that they must have full control in being able to pause works as required in order to allow archaeological investigation and recording as appropriate, with sufficient time allowed to enable this work to be completed.	Further wording aligned to these comments will be added within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6. The additional wording will be in the context of this being an Outline WSI.
16	3.14 Paragraph 164: A Statement regarding Treasure finds should be included here	Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, a short statement (paragraph) will be added in this regard.
17	3.15 Section 10.6 As well as site specific reporting, an Updated Project Design for the whole project needs to be prepared upon completion of the individual Post- Excavation Assessments, providing a scope and programme for the analysis, reporting, publication and dissemination of the findings. This should bring together the results of all stages of the archaeological project and provide a framework for further investigation of the material recovered and results from all parts of the scheme, in order to	Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added.



ID	Written Representation	Applicants' Comments
	facilitate a project wide analysis, reporting and publication strategy to be developed.	
18	3.16 Section 10.7 Newsletters and articles in popular publications should also be considered as part of the outreach strategy for the project.	Within the next update of the Outline Written Scheme of Investigation (Onshore) at Deadline 6, additional wording will be added.



2.3 Flood Risk

4. It should be noted that the Applicants will submit an updated Outline Operational Drainage Management Plan at Deadline 6. In particular, the updated plan will include the following:
 - Further detail on how the SCC drainage hierarchy (2018) has been applied to the Projects;
 - Further detail on the consideration given by the Applicants to an infiltration based drainage scheme (superseding the **SuDS Infiltration Clarification Note** (REP4-044) submitted at Deadline 4);
 - Updated attenuation calculations to demonstrate that surface water during a 1 in 100 year event +40% climate change can be accommodated within the proposed sustainable drainage system (SuDS) basins;
 - Updated calculations (where required) regarding use of the freeboard; and
 - Figures illustrating indicative site designs.

5. The Applicants also confirm that:
 - Existing watercourses and flow routes will be appropriately managed to ensure continued conveyance around the northern perimeter of the National Grid substation; and
 - That any removal of existing surface water flood storage basins will be offset within the final SuDS design.

6. All Deadline 4 comments made by SCC regarding the Outline Operational Drainage Management Plan are under consideration by the Applicants and will be accounted for within the updated document to be submitted at Deadline 6.



ID	Written Representation	Applicants' Comments
Draft DCO		
1	1.1 Schedule 1, Part 3, Requirement 41 – This should also reference the Work No 38 (sealing end compounds) and Work No 34 (permanent access road) served by the operational drainage management plan.	Requirement 41 has been updated to include reference to Work No. 34 and Work No. 38 and this is reflected in the draft DCO submitted at Deadline 5.
2	1.2 SCC questions whether Work No 33 needs to be reworded as this mainly relates to landscaping works, as part of OLEMS, but still references drainage	Work No. 33 comprises landscaping works including bunding and planting together with drainage works, sustainable drainage system ponds, surface water management systems, formation of footpaths and access. The landscaping and drainage are inextricably linked and the Applicants do not consider it to be necessary or appropriate to amend the description of Work No. 33.
Onshore Substations Update Clarification Note, Document Reference: REP3-057, Date: 15th December 2020		
3	Paragraph 15. This is only true for the EA1N & EA2 substations. The National Grid substation will still interact with an existing surface water flow path. No details have been provided on how this will be managed.	Please see paragraphs 4 – 6.
Outline Landscape and Ecological Management Strategy, Document Reference: REP3-030, Date: 15th December 2020		
4	Paragraph 45 & 136. This should be noted due to the impacts it has on future space restrictions for any extension to the National Grid substation. It should also be noted that the plan area of the attenuation/infiltration basins is yet to be agreed and thus, the plan area of these features may increase. This will result in even less space to the west of the proposed National Grid substation for future expansion.	Please see paragraphs 4 – 6. The Applicants are not incorporating future expansion of the National Grid substation (if any) within the scheme design and it is inappropriate for SCC to consider potential for expansion when it does not form part of the Applicants proposals.



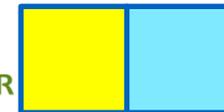
ID	Written Representation	Applicants' Comments
		
5	<p>Paragraph 134. As per comments in response to the Outline Operational Drainage Management Plan, the proposals do not manage surface water flood risk as required by national and local policy and do not comply with best practice</p>	<p>The Applicants refer to their response provided in ID1 of section 2.3 of Applicants' Comments on Councils' D3 Submissions (REP4-025).</p> <p>The Applicants commitment to SuDS attenuation ponds with a discharge connection to the Friston watercourse and incorporation of infiltration measures is reasonable and appropriate, and is in full compliance with the drainage hierarchy. It is incorrect to suggest the scheme is not compliant with the drainage hierarchy. The Applicants are committed to adopting a scheme design that is in accordance with the hierarchy, utilising infiltration where appropriate supported by attenuation. Ultimately the final design must consider wider design factors as well as preventing an increase to the pre-development greenfield run-off rate/discharge rate to the Friston Watercourse.</p> <p>The Applicants have demonstrated the viability of an attenuation design as a worst-case scenario (assuming infiltration is not possible). Infiltration will be incorporated within the design to reflect a reasonable balance between established infiltration rates, land use and landscaping requirements as appropriate.</p>



ID	Written Representation	Applicants' Comments
		<p>For context, the East Anglia ONE project, located within the Mid-Suffolk District Council/Suffolk County Council administrative boundary has successfully adopted an attenuation only system as part of its approved surface water drainage strategy in order to manage operational flood risk.</p>
6	<p>Paragraph 135. Disagree that 20% Climate Change is suitable, as per previous SCC representations. There is no commitment to remove impermeable areas by 2069 (the upper end of the 20% epoch). Instead, 40% should be used as a conservative approach. Regardless, neither of the proposed SuDS basins are designed to manage either the 1:100 + 20% or + 40% event, as explained in SCC's response to the Outline Operational Drainage Management Plan and specifically, Appendix A (SuDS</p>	<p>Please see paragraphs 4 – 6.</p>
7	<p>Paragraph 137. If infiltration is achievable and viable then this must be solely relied upon, as per previous SCC representations. If infiltration is not achievable or viable, then no infiltration rate can be utilised as part of the design process to ensure a conservative design approach based siltation of the base of the attenuation structure.</p>	<p>This position is unlikely to be representative of the drainage hierarchy.</p> <p>The Applicants commitment to SuDS attenuation ponds with a discharge connection to the Friston watercourse, and incorporation of an infiltration component, is reasonable and appropriate for these nationally significant infrastructure projects; and is in full compliance with the drainage hierarchy.</p> <p>Infiltration will be incorporated within the design to reflect a reasonable balance between established infiltration rates, land use and landscaping requirements, as appropriate.</p> <p>The Applicants refer to their response provided in ID5 of this table regarding the viability of infiltration.</p>
8	<p>Paragraph 139. Whilst the intention of this (to reduce existing surface water flood risk to Friston) is supported, the operational access road</p>	<p>Please see paragraphs 4 – 6.</p>

ID	Written Representation	Applicants' Comments
	<p>will result in the loss of an existing surface water flood storage basin. This must be replaced like for like to ensure there is no increase in surface water flood risk to Friston. The 'additional SuDS basin' would have to meet this requirement as a minimum and would not provide any additional benefit until this existing volume is replaced. The basin must serve the same catchment as the existing flood storage basin to ensure that surface water flood risk in Friston is not increased.</p>	
<p>Applicants' Comments on Written Representations, Volume 2: Technical Stakeholders, Document Reference: REP2-016,</p>		
9	<p>Section 2.6, Page 114. The Applicants have now provided the Outline Operational Drainage Management Plan at Deadline 3. As such, SCC are now able to comment on this. Details to address SCC's concern have not been provided as part of the submitted Outline Operational Drainage Management Plan. As such, it is still not known how the Applicant proposes to manage the watercourse running east to west that is directly on the line of the proposed NG substation. This is a serious concern for SCC which could ultimately result in an increase in surface water flood risk to the development and to downstream receptors such as Friston.</p>	<p>Please see paragraphs 4 – 6.</p>
<p>Outline Operational Drainage Management Plan, Document Reference: REP3-046, Date: 15th December 2020</p>		
10	<p>Paragraph 31. No detailed assessment of Friston Surface Water Management Plan (SWMP) has been undertaken. The Outline Operational Drainage Management Plan reiterates information contained within the SWMP but there is no assessment of how this affects/informs the surface water drainage strategy and in particular the Outline Operational Drainage Management Plan. As such, this SPR statement is not correct.</p>	<p>Please see paragraphs 4 – 6.</p> <p>The outputs from the Friston Surface Water Management Plan (SWMP) were considered during the development of the Outline Operational Drainage Management Plan (REP4-003). The conclusions of the SWMP support the Applicants; existing understanding of flood risk which was set out in the Flood Risk Assessment (APP-496). On this basis</p>

ID	Written Representation	Applicants' Comments
		the SWMP does not materially alter the proposed surface water drainage strategy.
11	<p>Table 3.1 – Data Sources. The Environment Agency’s website states; “The results are an indicator of an area’s flood risk, particularly the likelihood of surface water flooding. It is not suitable for identifying whether an individual property will flood. It does not include the flood risk from sources such as blocked drains and burst pipes.” On this basis, and as per previous SCC representations, this information is not suitable to be used with a high level of confidence. This level of confidence could be assigned to the Friston Surface Water Management Plan.</p>	<p>Please see paragraphs 4 – 6.</p> <p>In the updated Outline Operational Drainage Management Plan, to be submitted at Deadline 6, the confidence in the ‘Environment Agency’s Risk of Flooding from Surface Water’ data set has been reduced from high to medium. Additionally, the BMT Group (2020) study will be added into the updated Outline Operational Drainage Management Plan, to be submitted at Deadline 6, and will be assigned a confidence of High.</p> <p>As per the Applicants response to ID5 above, the outputs from the SWMP have been reviewed and support the existing understanding of surface water flood risk and therefore do not change the conclusions of the assessment.</p>
12	<p>Paragraph 45. This flood risk is associated with a series of ordinary watercourses, one from the north, in proximity to Little Moor Farm, the other from the east. The National Grid substation is located directly on the line of these watercourses. It is unclear how these watercourses will be facilitated alongside the development whilst complying with Suffolk County Council Policy to resist the piping of ordinary watercourses. Whilst it is acknowledged that this will be the subject of a Land Drainage Act Consent application, SCC have serious concerns on this matter which could ultimately result in an increase in surface water flood risk to the development and to downstream receptors such as Friston.</p>	Please see paragraphs 4 – 6.



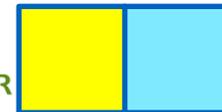
ID	Written Representation	Applicants' Comments
13	<p>Paragraph 57. Minutes from ETG 19/11/2019 state: "MW indicated that the event on 6th October has been confirmed by the Environment Agency as being equivalent to a 1 in 40 year event. Other rain gauges in the wider area indicated a return period of approximately 1 in 5 or 1 in 10 years. This difference may indicate that, due to limited historic data, the rainfall in Friston was of this magnitude, or that the rainfall event was more localised and heavier in the Friston area." As such, the statement contained in the Outline Operational Drainage Management Plan is misleading. SCC has no record of an email dated 25th September 2020 and requests clarification from the Applicant.</p>	<p>For clarity, the Applicants are referring to the email sent from Mr Matt Williams to Mr McGrellis on 9th October 2020. Mr Williams was responding to two emails dated 25th September 2020 and 1st October 2020 from Mr McGrellis. This contained a screenshot of the suggested return period for the October 2019 Friston rainfall event.</p>
14	<p>Paragraph 60. As per previous SCC representations, this is the wider Friston River hydraulic catchment and not the catchment of Friston village itself.</p>	<p>For clarity, the information presented in paragraph 60 is taken from the BMT (2020) study commissioned by SCC and is providing context in relation to the Friston catchment. Paragraph 61 summarises information in relation to Friston village at a more local scale.</p>
15	<p>Paragraph 62. The Applicants are requested to clarify where exactly the BMT report states that soils in the upper catchment are 'very permeable'. Additionally, the document goes on to acknowledge the upper catchment (the area for proposed development) is predominantly made up of clay soils. These two statements are contradictory.</p>	<p>Paragraph 62 is based on information taken directly from section 2.2.2, page 19 of the BMT (2020) study commissioned by SCC, which appears to be contradictory. The Applicants would welcome clarification on this from SCC.</p> <p>The Applicants are committed to confirming the ground conditions through ground investigation works, post consent for use in detailed design.</p>
16	<p>Paragraph 65. Why has the SWMP modelling not been considered at this stage? The Applicant must not only use the existing model but they should build on and develop the model further.</p>	<p>As per the Applicants response to ID5 above, the outputs from the SWMP have been reviewed and support the existing understanding of surface water flood risk and therefore do not change the conclusions of the assessment. The SWMP will be considered further during the detailed design process post consent.</p>

ID	Written Representation	Applicants' Comments						
17	Paragraph 70. The final Operational Drainage Management Plan should include the results of infiltration testing on which the design is based. The scope and extent of the soil surveys will need to be determined well in advance of this. This suggestion is illogical. There is no reason why these details cannot be agreed now.	Please see paragraphs 4 – 6. The Applicants do not deem it currently necessary to develop the scope and extent of these future surveys at this stage.						
18	Paragraph 72. Whilst both methodologies are recognised, CIRIA SuDS Manual states a clear preference for the use of the FEH methodology wherever possible; “FEH methods should be the preferred approach for developing runoff estimate for use in surface water management design”. Given FEH outputs provide a more conservative approach and given the existing surface water flood risk in Friston, this is the approach supported by SCC. SCC request that the use of IH124 methodology is removed from calculations for clarity.	The Applicants note that IH124 was originally included at the request of Suffolk County Council in order to offer a comparison of the two methods. In light of this clarification from SCC, IH124 will be removed from the Outline Operational Drainage Management Plan to be submitted at Deadline 6.						
19	Paragraph 75. SCC LLFA do not support this approach. If infiltration is proven to be achievable and viable then this must be utilised, as per the surface water disposal hierarchy. If infiltration is not shown to be achievable or viable then infiltration cannot be factored into the design of an attenuation and positive discharge system.	Please see paragraphs 4 – 6.						
20	Paragraph 80. The design attenuation storage for both attenuation basins falls well short of the required attenuation volume (even when only accounting for 20% climate change) for each substation. These figures are taken from Outline Operational Drainage Management Plan, Appendix A: SuDS Design Summary Assumptions.	Please see paragraphs 4 – 6.						
	<table border="1"> <thead> <tr> <th></th> <th>Storage req. (m3)</th> <th>Design storage (m3)</th> </tr> </thead> <tbody> <tr> <td>EA1N/EA2</td> <td>9669.9</td> <td>5927.6</td> </tr> </tbody> </table>		Storage req. (m3)	Design storage (m3)	EA1N/EA2	9669.9	5927.6	
	Storage req. (m3)	Design storage (m3)						
EA1N/EA2	9669.9	5927.6						

ID	Written Representation			Applicants' Comments
	NG	6445.6	4069.5	
	<p>As per the above figures, the design storage of each basin is far below the storage required. The projects rely on flooding wider areas, beyond the attenuation basin, during the 1:100+20% event. Utilising freeboard and the perimeter access track for storage during the design storm event is not compliant with local and national guidance. This approach demonstrates a clear increase in surface water flood risk. Further comments on this point are contained below in response to Appendix A (SuDS Design Summary Assumptions) of this document. A maximum design water depth of 1m would be acceptable, a minimum freeboard of 300mm should be provided with a total basin depth of 1.5m</p>			
21	<p>Paragraph 81. The calculations provided demonstrate there is an increase in off-site flood risk during the 1:100+40% event. As a result, this sensitivity test has not been met. The degree of failure (cumulatively 2,661.6m³) is considered a significant failure and a significant increase in surface water flood risk.</p>			Please see paragraphs 4 – 6.
22	<p>Paragraph 84. A review of whether the proposed SuDS provides sufficient treatment of surface water must be completed at this stage. Failure to do so could result in insufficient space being allocated for SuDS and thus proprietary treatment measures being implemented at a later date, contrary to NPS EN-1.</p>			The Applicants note that treatment infrastructure will be required for the SuDS. Treatment measures will be considered further during detailed design, post consent, as is normally undertaken for such nationally significant infrastructure projects.
23	<p>Paragraph 92. This road will intersect an existing ordinary watercourse and an existing surface water flood storage basin. The identified surface water flood risk is associated with these existing features. Whilst the watercourse will be subject to land drainage consent and</p>			Please see paragraphs 4 – 6.



ID	Written Representation	Applicants' Comments
	<p>thus SCC have an element of control, the existing surface water flood storage basin will not be protected under the Land Drainage Act 1991. Therefore, details on how this feature will be replaced to prevent an increase in surface water flood risk to Friston must be provided now</p>	
24	<p>Paragraph 93. Incorrect reference to section proposing production of catchment hydraulic model</p>	<p>Please see paragraphs 4 – 6.</p>
25	<p>Paragraph 94. Whilst the intention of this (to reduce existing surface water flood risk to Friston) is supported, the operational access road will result in the loss of an existing flood storage basin. This must be replaced like for like to ensure there is no increase in surface water flood risk to Friston. The 'additional SuDS basin' would have to meet this requirement as a minimum and would not provide any additional benefit until this existing volume is replaced. The basin must serve the same catchment as the existing flood storage basin to ensure that surface water flood risk in Friston is not increased.</p>	<p>Please see paragraphs 4 – 6.</p>
26	<p>Paragraph 95. An additional basin would require the work stated by SPR. However, replacement of the existing surface water flood storage basin with a like for like feature would not require such modelling and must be done now to ensure there is no increase in surface water flood risk to Friston.</p>	<p>Please see paragraphs 4 – 6.</p>
27	<p>Paragraph 96. This outfall pipe would only be required if a positive discharge to the Friston Main River was required, i.e. infiltration was proven not to be achievable or viable.</p>	<p>Please see paragraphs 4 – 6.</p>
28	<p>Paragraph 98. Section 3.4 only proposes to undertake a detailed topographic survey.</p>	<p>Please see paragraphs 4 – 6.</p>



ID	Written Representation	Applicants' Comments
29	<p>Paragraph 99. SCC are conscious that through Written Questions the ExA have previously asked the Applicants of their intentions for long term SuDS adoption & maintenance. SCC wish to highlight that the details contained within this document are somewhat ambiguous when compared to the Applicants response to Written Questions on this topic.</p>	<p>The Applicants have previously confirmed to SCC that the undertaker will retain responsibility for the maintenance of the Projects surface water drainage system (to the point of connection to the Friston Watercourse).</p> <p>The Applicants confirm its commitment to maintaining the Projects' site drainage system during the operation phase of the Projects. This is outlined in Section 5.4 of the Outline Operational Drainage Management Plan (REP4-003).</p> <p>Requirement 41 within the dDCO (REP3-011) requires an operational drainage management plan to be submitted to and approved by the relevant planning authority and which must include provision for the maintenance of any drainage measures. This requirement also states that the Operational Drainage Management Plan must accord with the Outline Operational Drainage Management Plan, and be implemented as approved.</p>
30	<p>Paragraph 102. Whilst it is noted that the Applicant intends to apply for Land Drainage Consent post-consent, this presents a problem. The National Grid substation is directly on the line of an existing ordinary watercourse. SCC have no details RE how this watercourse would be facilitated. SCC Policy would not accept piping or pumping. A diversion may be possible but given the proposals and site topography, it is unclear whether this is possible. It would be prudent for the Applicant to put some thought to this issue and provide a potential solution so SCC can see there is a feasible solution available. If the Projects obtain DCO consent but there is not a SCC policy compliant solution available for the re-routing of this watercourse, what would be the next course of action? It makes sense to address this now.</p>	<p>Please see paragraphs 4 – 6.</p> <p>The Applicants note that it is SCC policy not to accept piping or pumping and confirm that the Applicants are not seeking to culvert or pipe watercourses. The proposed dimensions and location of the watercourses will be confirmed during the detailed design of the proposed substations.</p>

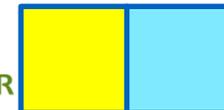
ID	Written Representation	Applicants' Comments
31	<p>Appendix A.</p> <ol style="list-style-type: none"> 1. Calculations demonstrate that the required attenuation volume for 1:100 + 20% cannot be accommodated without utilising freeboard. Thus, leaving the basin without any freeboard during the critical event. Freeboard must not be used for the design event. CIRIA SuDS Manual defines 'freeboard' as "distance between the design water level and the top of the structure, provided as a precautionary safety measure against early system failure". A freeboard of 300mm above the design water level is considered acceptable. 2. SCC LLFA maintains its position that the Projects should be using 1:100+40% as the design event, 3. The calculations demonstrate a combined flood volume of 2,661.6m³ during 1:100+40% that is not proposed to be retained within the site, hence increasing surface water flood risk in Friston. <p>To be clear, it is SCC LLFA's view that the above points are entirely unacceptable and represent a significant increase in surface water flood risk off site, specifically to Friston. This is contrary to national and local policy. The Applicant has provided no explanation as to why they deem this to be an acceptable approach.</p> <ol style="list-style-type: none"> 4. No plans have been provided to illustrate the plan area of the basins in relation to the proposed Projects. This plan should include dimensions for the basins. 5. No plans or sections have been provided to illustrate the location and design of swales. 6. The calculations suggest that the post-development run off rate would be limited to the greenfield 1 in 2 year event. Could this please be confirmed? If so, this is a significant betterment to existing runoff 	<p>Please see paragraphs 4 – 6.</p>

ID	Written Representation	Applicants' Comments
	<p>rates and should be highlighted as a design criterion within the report. This should be used to demonstrate the Projects can comply with volume control requirements for the 1 in 100, 6 hour event. 7. As per earlier response to Para 80, the detention basin design volumes fall well short of the attenuation storage volume required based on proposed impermeable areas.</p> <p>8. No breakdown of these calculations has been provided. For example, greenfield runoff calculations and MicroDrainage calculations must be provided to support the basic details that have been provided.</p> <p>9. Sections through the proposed basins should be provided with water levels for 1:1, 1:30 & 1:100 (all with CC) shown on the sections.</p> <p>10. SuDS sizing has been estimated using FSR rainfall, despite SCC stating a clear preference for the use of FEH rainfall.</p>	
32	<p>At no point in this document is it made clear that infiltration must be prioritised. Indeed, no reference is made at all to the SuDS Infiltration Note submitted previously by the Applicant. The SuDS Infiltration Note should be integrated into this document. This document should then clearly state that infiltration will be pursued primarily as per the SuDS Infiltration Note, with an attenuation and positive discharge approach only being pursued if infiltration is demonstrated to be unachievable or unviable. Read in isolation, this document seeks to pursue an attenuation and positive discharge approach, contrary to national and local policy & guidance.</p>	<p>Please see paragraphs 4 – 6.</p> <p>The Applicants refer to the SuDS Infiltration Clarification Note (REP2-012) within paragraph 4 of the Outline Operational Drainage Management Plan (REP4-003). The Applicants also explain SuDS infiltration within section 5.2.2 of the Outline Operational Drainage Management Plan (REP4-003).</p>
<p>Outline Watercourse Crossing Method Statement, Document Reference: REP3-048, Date: 15th December 2020</p>		
33	<p>Section 3. There are no details for the specific works proposed to ordinary watercourses but in principle, the techniques outlined in</p>	<p>The watercourse in the vicinity of the National Grid substation would be routed to the north of the National Grid substation, within the order limits,</p>



ID	Written Representation	Applicants' Comments
	<p>section 3 are acceptable methods to use for temporary works to the watercourses. With regards to the permanent works, careful consideration must be considered to ensure proposals are in keeping with SCC policy and guidance (see below response to paragraph no 71).</p>	<p>and the Applicants are not seeking to culvert or pipe these watercourses. The proposed dimensions and location of these will be confirmed during the detailed design of the substation(s) and submitted as part of the Land Drainage Act Consent application and within the final Operational Drainage Management Plan.</p> <p>The Applicants note that SCC deems the techniques outlined by the Applicants to be acceptable.</p>
34	<p>Paragraph 54. In addition to this, no materials should be stored on identified surface water flow paths</p>	<p>Noted.</p>
35	<p>Paragraph 61. As per previous SCC representation, it is unclear how surface water will be managed in areas with reduced working widths.</p>	<p>The working width of 40m in respect of the Hundred River crossing is sufficient for the management of surface water drainage during the construction period.</p>
36	<p>Paragraph 62. As per previous SCC representation, it is unclear how surface water will be managed in areas with reduced working widths.</p>	<p>Where a reduced working width is utilised surface water run off will be captured and transferred further up or down the onshore cable route (away from the reduced onshore cable route width location).</p>
37	<p>Paragraph 71. Whilst it is noted that the Applicant intends to apply for Land Drainage Consent post-consent, this presents a problem. The National Grid substation is directly on the line of an existing ordinary watercourse. SCC have no details RE how this watercourse would be facilitated. SCC Policy would not accept piping or pumping. A diversion may be possible but given the proposals and site topography, it is unclear whether this is possible. It would be prudent for the Applicant to</p>	<p>Please see the Applicants' response to ID30, as SCC pose the same question above.</p>

ID	Written Representation	Applicants' Comments
	put some thought to this issue and provide a potential solution so SCC can see there is a feasible solution available. If the Projects obtain DCO consent but there is not a SCC policy compliant solution available for the re-routing of this watercourse, what would be the next course of action? It makes sense to address this now.	
38	Paragraph 96. The Lead Local Flood Authority and Internal Drainage Board must also be consulted during the preparation of the final Watercourse Crossing Method Statement in relation to Ordinary Watercourses.	Noted. This will be updated within an updated version of the Outline Code of Construction Practice at Deadline 6.
Outline Code of Construction Practice, Document Reference: REP3-022, Date: 15th December 2020		
39	Paragraph 8. The Lead Local Flood Authority and Internal Drainage Board must also be consulted during the preparation of the final Watercourse Crossing Method Statement in relation to Ordinary Watercourses.	Noted. This will be updated within the Outline Code of Construction Practice to be submitted at Deadline 6.
40	Paragraph 37. These control measures must also be applied to areas of identified surface water flood risk.	The principles set out in the Outline Code of Construction Practice (REP3-022) for the control measures to be applied in areas identified at risk of fluvial flooding will also be applied to areas identified as being at surface water flood risk where relevant. This addition will be made within the updated version of the Outline Code of Construction Practice at Deadline 6.
41	Paragraph 38. These control measures must also be applied to areas of identified surface water flood risk.	
42	Paragraph 105. This point needs to be updated to reflect the Outline Operational Drainage Management Plan.	Noted. This will be updated within the Outline Code of Construction Practice to be submitted at Deadline 6.
43	Paragraph 108. These control measures must also be applied to areas of identified surface water flood risk.	Noted. This will be updated within the Outline Code of Construction Practice to be submitted at Deadline 6.



ID	Written Representation	Applicants' Comments
	<p>As per previous SCC representations, it has not been demonstrated that these mitigation options are deliverable within the redline boundary and comply with national and local requirements of prioritising the surface water disposal hierarchy.</p>	<p>The Applicants are committed to the implementation of the principles set out in the Outline Code of Construction Practice to limit the potential risks associated with the proposed development. These principles are based on best practice as summarised in Paragraph 108 of the Outline Code of Construction Practice (REP3-022) and the details related to the implementation of these will be provided in the final Code of Construction Practice.</p>

2.4 Public Rights of Way (PRoW)

ID	Written Representation	Applicants' Comments
dDCO		
1	<p>1.1 Schedule 7- There are a large number of parcels shown on the land plans to which there is a restrictive covenant preventing any sort of hard surfacing material to be laid without the consent of the undertaker. These parcels include public rights of way for which the County Council has a duty to maintain and powers to improve, and the proposed restrictive covenant could fetter the Council's ability to implement its statutory duty. Public highways, which includes public rights of way should be excluded from this restrictive covenant. The County Council carries out surfacing work to create a more resilient surface or to enable a wider range of users, including those who may be mobility impaired. This type of work would typically involve laying down a compacted crushed stone topped with a compacted layer of finer material to give a smooth surface but could also include providing a tarmac surface.</p>	<p>The Applicants do not consider that public rights of way should be excluded from the restrictive covenant. The restrictive covenant is not a prohibition on any works above the cable, it just means that the undertaker would require to give consent before hardstanding is placed above the cable (and such consent is not to be unreasonably withheld or delayed).</p> <p>The Applicants would however note that the specification of any PRoW affected by the development requires to be approved by the relevant highway authority in accordance with Requirement 32 through the approval of the PRoW strategy and so the highway authority will get the opportunity to comment on and approve the final specification of any affected PRoW through that process.</p>

2.5 Traffic and Transport

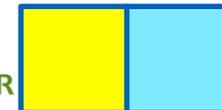
ID	Written Representation	Applicants' Comments
dDCO		
1	1.6 The period allowed for the discharge of requirements is considered to be insufficient and unreasonable, as is the requirement to request additional information within a certain time period and also the deemed consent if requirements are not discharged within time.	<p>The Applicants consider the time periods to be necessary and appropriate given that these are nationally significant infrastructure projects. The Applicants would however highlight that in practice, the Applicants would consult with the Council in the preparation of the draft documents prior to submitting the final versions for approval and therefore it is not considered that the timescales specified are unreasonable. Furthermore, the process makes provision for longer periods to be agreed between the parties.</p> <p>The Applicants are also discussing a PPA with SCC to set out the process for discharging requirements, managing orders and supervision and recovery of costs.</p>
Deadline 3 Submission - ExA.AS-9.D3.V1 EA1N&EA2 Traffic and Transport Clarification Note for Deadline 3 - Version 01: REP3-055		
2	3.3 The code of practice states that 'the desirable width for shuttle working with normal traffic (i.e. including buses and HGVs) lies between 3.25 and 3.5 m. This range avoids certain widths that create opportunities for unsafe overtaking of cyclists, and is based on Department for Transport guidance'. The code of practice does state that for shuttle working the absolute minimum width is 3.0m for normal traffic.	An absolute minimum width of 3.0m is considered adequate noting the short duration of the works required to 'tie-in' accesses.
3	3.4 In paragraph 6 a safety clearance of 0.5m is quoted. While correct for roads with speed limits of 40mph or less a sideways safety zone of 1.2m is required for higher speeds.	Table 3.2, Traffic and Transport Clarification Note for Deadline 3 (REP3-055) confirms a proposal to reduce speed limits to below 40mph for the duration of the construction of highway works.
4	3.5 A working width of 2.5m (paragraph 2.5m) is likely to prevent slewing of excavators when loading or unloading construction vehicles and will require drivers of large vehicles to exit onto the verge. Reduction of the	The Applicants have considered the methodology for access tie-ins.



ID	Written Representation	Applicants' Comments
	<p>working area to 1.5m would likewise prevent most mechanical plant from operating within the carriageway and hence would have to work from the verge or within the site. This method does not allow for the impact on footways and cycleways adjacent to the carriageway when a minimum of 1.0m width must be maintained. The LHA would ask that the applicant is confirms they have considered these matters in their proposals.</p>	<p>Where highway space is constrained the adjacent land within the order limits can be utilised to:</p> <ul style="list-style-type: none"> a) Extend the working area and provide space for temporary footway/carriageway re-alignment; and b) Provide access for construction plant and vehicles and loading.
5	<p>3.6 The LHA notes that using the method proposed in paragraph 20 a 6.0m wide road would need to be widened on either side to enable an open cut trench to be cut and backfilled. This may cause a problem on Sizewell Gap (access 1 and 2) where a shared footway / cycleway is present along the south side and the B1122 at Aldringham (access 5 and 6) where a footway is present on the western side. The LHA preference remains HDD or similar methods.</p>	<p>Please see response to ID4.</p> <p>HDD is not a viable crossing highway technique given the lateral spread of the HDD working area required at each side of the road, and the long duration of the HDD activities. Open trenching can be undertaken without road closures.</p>
6	<p>3.7 In summary the LHA has doubts about the practicality of the proposed traffic management. However, with the exception of Sizewell Gap that forms the sole access to Sizewell B the authority would consider short duration closures of roads.</p>	<p>Please see response to ID4. The Applicants would use extra land provided within the order limits where required to ensure that road closures are not required for access tie-ins.</p>
7	<p>3.8 The comments made in 4.1 to 4.6 are also applicable to the proposals in paragraph 23 to 27, although if temporary road closures are considered on the A1094 it is likely that restrictions on working during the day or peak hours are likely to be imposed as this road is the main route into Aldeburgh.</p>	<p>The Applicants consider the work can be carried out under a lane closure. SCC comments with regard to traffic sensitivity are noted, the detailed design and timing of roadworks will be agreed with the Highway Authority, exercising its powers under the Traffic Management Act 2004 and the New Road and Street Works Act 1991 to secure the safe and expeditious movement of traffic.</p>
8	<p>3.9 It is unclear what level of vehicular access will be provided for residents of Church Road. Church Road is a public footpath but it is proposed that this will be temporarily closed and diverted. What</p>	<p>The final design of the temporary road closure of Church Road would be developed by the appointed contractor and agreed with SCC as the local highway authority. There are a number of options available to ensure that access can be maintained, these are detailed below.</p>

ID	Written Representation	Applicants' Comments
	<p>arrangements will be provided to allow residents to access their properties.</p>	<ol style="list-style-type: none"> 1) The use of trenchless methods to install the ducts under the road. Drill pits could be positioned to allow access to residents, the Village Hall and Church from either the east or west of Church Road. 2) The staging of trenching works to allow drainage ducts to be installed in sections. For example, works along Church Road could be completed by working west from the church/Village Hall access thereby allowing access from the east via Church Road, and then working east of this access to allow access from the west. 3) Using steel plates to allow local access over open trenches.
9	<p>3.10 Temporary alterations of speed limits will require enactment of temporary traffic regulation orders through s14 of the Road Traffic Regulation Act 1984 https://www.legislation.gov.uk/ukpga/1984/27/section/88. Section 15(1) states that temporary speed restrictions cannot exceed 18 months duration unless the authority is satisfied that the works will take longer to execute and states this on the order, as per Section 15(2). The authority will require that at the time the applicant requests an order that the current program of works is submitted so that the duration of the order can be realistically determined. Further details are found on the SCC website although these presume temporary restrictions are not extended beyond 18 months https://www.suffolk.gov.uk/roads-andtransport/roadworks/apply-for-a-temporary-road-closure/</p>	Noted.
10	<p>3.11 Drawing TP-PB4842-DR003 for access 2 shows the edge of the carriageway tight against the red line boundary. The LHA would suggest the applicant satisfies themselves that enough room has been allowed for construction of the carriageway.</p>	Noted. The final design will be subject to more detailed site measurements and if required can be moved slightly west without compromising visibility or any other design basis.

ID	Written Representation	Applicants' Comments
11	3.12 Drawing TP-PB4842-DR011 shows a small area east of access 9 where the visibility splay is outside the red line and also the highway boundary. The applicant will need to demonstrate that the visibility can be achieved and maintained for the duration of the project(s) so that safe access to the site can be achieved.	Noted. This is a drawing layer error. The drawing will be amended in an updated Outline Access Management Plan to demonstrate the visibility can be achieved within the Order limits.
Deadline 3 Submission - 8.9 Outline Construction Traffic Management Plan (Tracked) - Version 02: REP3-033		
12	3.13 The LHA notes that the OCTMP scope (e.g. paragraph 9) does not include Onshore Preparation works and that this item has been removed from the glossary. The LHA is concerned that this will remove any controls on construction vehicles involved in Onshore Preparation Works, which includes construction and improvements of site accesses. While the LHA is not specifically concerned about the quantity of movements it would prevent controls being applied to timing or routing of construction vehicles and requests relevant controls are included.	The Applicants are considering this point and will provide a response at Deadline 6.
13	3.14 The OCTMP should include a commitment that details of the Transport Coordinator (TCO) and any subsequent change in postholder shall be submitted to the LHA and Local Planning Authority (LPA) with a reasonable time from appointment (say 20 working days).	The Outline Construction Traffic Management Plan will be updated at Deadline 6 to include this commitment.
14	3.16 Prior to the Deadline 3 submission Table 2.1 originally set out a useful summary of HGV movements assessed across the local road network and not just the proposed accesses which forms the current version of the table. For monitoring purposes it is the LHA opinion that the table should be retained in its original form (therefore, as submitted in the original DCO submission) whereby HGV movements would be controlled to the impact on links as assessed within the Environmental Statement.	The original table will be reinstated and the maximum Heavy Goods Vehicle (HGV) movements per access will be retained as per SCC suggestion.



ID	Written Representation	Applicants' Comments
15	3.17 Further to this, the LHA recommends a separate table is included showing the maximum permitted HGV movements at each access to ensure compliance with the assessed numbers as stated at paragraph 36.	Please see response to ID14.

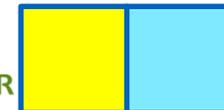


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16	3.18 The booking system proposed in paragraph 38 will, in isolation, not provide a robust method of monitoring as it does not record times HGVs	The Applicants consider that the monitoring techniques proposed are reasonable given the nature and scale of the onshore elements of the																																														



ID	Written Representation	Applicants' Comments
	<p>are on the network nor which route they have taken to site. Paragraph 43 sets out that a unique identifier will be provided in the cab of the HGVs; however, this is not considered by the LHA as an effective method of monitoring nor as a method of identification to allow members of public to report an incident. The LHA notes that as the CTMP is only implemented at commencement of construction controls such as routing of HGVs are not applicable to construction vehicles necessary for the preparation works including construction of the site accesses.</p>	<p>Projects, however the Applicants are in discussion with SCC regarding mechanisms for monitoring HGV compliance.</p>
17	<p>3.19 The HGV timings set out in paragraph 41 relate to working hours. This will not prevent construction traffic moving across the local highway network at any time of day or night, nor parking overnight on the network.</p> <p>The LHA suggest alternative wording</p> <p>'In accordance with the OCoCP, submitted as part of this DCO application construction related traffic shall not use the local highway network 1 hour before or 1 hour after the standard construction hours which are 0700-1900 Monday to Friday 0700-1300 Saturday Construction related traffic shall not be permitted to park overnight on the Local Highway Network' The Local Highway Network is defined as any point north of the A12/A14 Seven Hills Interchange or South of the A47 Lowestoft Bascule Bridge.</p>	<p>The Applicants do not consider this a proportionate measure given the nature and scale of the Projects' onshore construction. Economics dictate the majority of materials (such as aggregates and concrete) will have a local/regional supply chain. It would not be viable for these suppliers to have vehicles subject to down time due to overnight stays or arriving ahead of delivery slots.</p>
18	<p>3.20 It is not clear in paragraph 43 what mechanism will be provided so that residents can identify if a vehicle is engaged on construction of EA1(N) or EA2 nor that such measures would be robust, relying on reports from third parties of transgressions. In the LHA's opinion a more robust method is GPS tracking, which is widely available, and it is understood likely to be used to monitor Sizewell C construction traffic. Other advantages are real time tracking which aids traffic management</p>	<p>See response to ID16, ID21, ID25.</p>

ID	Written Representation	Applicants' Comments
	during incidents on the network. This would also allow monitoring of vehicles to prevent overnight parking on the local highway.	
19	3.21 The LHA note that any person or persons stopping traffic on the public highway as proposed in paragraph 47 must have the relevant legal powers to do so.	Traffic signs manual chapter 8 (part 1) road works and temporary situations - design (2009) includes provisions for stopping traffic for example 'stop works' or stop/go boards. The Applicants are aware of the regulatory position and will ensure it is followed at all times.
20	3.22 The LHA request confirmation that all major improvements (e.g. road widening, junction modification) to highway infrastructure to allow passage of transformers, with the exception of structures, has been included within the DCO and paragraph 56 relates to minor works such as temporary removal and replacement of street lights, traffic signals and traffic islands.	SCC is correct in its interpretation. This will be further clarified in the next revision of the Outline Construction Traffic Management Plan (REP3-033).
21	3.23 In paragraph 146 and Table 19.28 of 6.1.19 Chapter 19 Air Quality https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-001275-6.1.19%20EA1N%20Environmental%20Statement%20Chapter%2019%20Air%20Quality.pdf the applicant demonstrates the modelling of the air quality impacts assumes a proportion of EURO VI standard vehicles. The Councils have accepted that a sensitivity test undertaken by the applicant demonstrate that at a 70% proportion of EURO VI is a realistic scenario with acceptable impacts, although this is subject to final agreement as part of the statement of common ground. Paragraph 59 of the revised OCTMP does not provide an adequate control regime to achieve compliance with these assumed values merely stating EURO VI standards will be adhered to as far as reasonably practicable or where possible.	The Applicants are in discussion with SCC regarding mechanisms for monitoring HGV compliance.



ID	Written Representation	Applicants' Comments
22	3.24 As stated in our Relevant Representations the highway works referred to in paragraph 61 of the OCTMP are not considered acceptable to the LHA (works no 35 and 36) or lacking in detail to make an informed assessment (works 37).	The Applicants are in discussion with SCC in relation to this matter.
23	3.25 Technical approval by the LHA (paragraph 69) will be required to any work within the public highway.	Noted.
24	3.26 To clarify its position the LHA expects monitoring of HGV numbers (paragraph 76), HGV routeing (paragraphs 78 to 82) and near misses (paragraph 82) will be reported to the LHA by the TCo on a quarterly basis rather than on request (paragraph 83). SCC would ask that the monitoring reports as detailed in paragraph 89 are also made public, preferably through a SPR hosted website or alternatively by the LPA.	The Applicants agree in principle to the suggested reporting regime and will liaise with the Council's to establish the most appropriate mechanism.
25	3.27 Table 4.1 "CTMP Action Plan does not include monitoring of EURO standards for HGVs. The LHA considers that if either or both EA1(N) and EA2 are constructed concurrently with Sizewell C that a formal engagement of the SPR TCo with the Sizewell Transport Review Group will be necessary so that emerging cumulative impacts can be monitored and action taken if necessary.	The Applicants are in discussion with SCC regarding mechanisms for monitoring HGV compliance.
Deadline 3 Submission - ExA.AS-2.D3.V1 EA1N Outline Port Construction Traffic Management and Travel Plan - Revision 01: REP3-047		
26	3.28 A Transport Assessment may be required by the LHA to determine the likely traffic flows associated with port activities (Paragraph 6).	Noted.
27	3.29 As the LHA SCC's main concerns associated with construction activities at a port (Paragraphs 8 & 20) would include road safety, highway capacity and the presence of sustainable transport infrastructure to reduce vehicle movements and promote sustainable development.	Noted.



ID	Written Representation	Applicants' Comments
	<p>However, both noise and air quality impacts will be of interest to both SCC and ESC and the applicant should liaise with both parties on this matter.</p>	
28	<p>3.30 The applicant quotes the National Planning Policy Framework in Paragraph 11. The NPPF in paragraph 111 in full states 'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed'. During early discussions with SPR as LHA SCC agreed that a robust Environmental Statement could contain the information contained within a Transport Assessment. Therefore, any review such as described in paragraph 16 and 18 shall be presented in a transport assessment or, if acceptable to the examiner and local highway authority or contained within a port environmental statement.</p>	<p>The Applicants are committed to carrying out an appropriate assessment at the relevant time taking into account the works required and the nature of the port selected. Requirement 28 makes provision for the submission and approval of a CTMP and a Travel Plan prior to the commencement of the onshore works and Requirement 36 makes provision for a Port CTMP and a Port Travel Plan in respect of the onshore port related traffic arising from the construction and operation of Work No.1 respectively.</p>
29	<p>3.31 It is not considered sufficient to only consider relevant Air Quality Management Areas within the confines of Suffolk as stated in paragraph 21 as the selected port may fall outside these limits.</p>	<p>The Applicants agree that it would not artificially restrict any assessment to air quality management areas within SCC's administrative boundary. The Applicants consider that paragraph 21 does make this clear noting that assessment will include impacts on '<i>any relevant Air Quality Management Areas</i>'.</p>
30	<p>3.32 Management of the PCTMP and PTP as described in paragraph 30 should be included in the role of the TCo detailed in the OCTMP with clear reporting lines from the Construction site manager, operations manager and plan co-ordinator to ensure effective co-ordination of delivery of the plans.</p>	<p>The Applicant agrees with this request and will update the Outline Port Construction Traffic Management and Travel Plan at Deadline 6.</p>



ID	Written Representation	Applicants' Comments
31	3.33 The LHA considers that the initiatives proposed in paragraph 32 to encourage modal shift should also refer to improvements in highway infrastructure where necessary and in proportion to the benefits.	The measures proposed reflect the likely magnitude of effect at a Port location and applies management measures to minimise traffic impact. It is not anticipated hard engineering would be as effective in meeting the plans objectives.
Deadline 3 Submission - 8.10 Outline Access Management Plan (Tracked) - Version 02: REP3-035		
32	3.35 It remains unclear how the temporary speed limits referred to in paragraph 28 are to be implemented, but the LHA presumes that the applicant will be requesting the LHA to raise temporary traffic regulation orders. The LHA requests the applicant clarifies their intentions on this matter.	The Applicants will request that the SCC raises the temporary traffic regulation orders and is in discussions with regard to funding mechanisms. Discussions on this matter are ongoing.
33	3.36 The temporary speed limits on Sizewell Gap may require modification in terms of the extent as they need to be consistent with any similar measures proposed by EDF for Sizewell B and C projects on this road. The applicant should allow for this when finalising details of the temporary speed limits and liaise with the Sizewell B and C project teams.	Noted.
34	3.37 Technical approval of accesses in paragraph 37 will be required in addition to that submitted within the DCO as additional technical details are required such as drainage and construction thicknesses and materials.	Noted.
35	3.38 SCC now manages roadworks through permitting process rather than noticing (paragraph 46) and may impose restrictions on such works such as off peak working.	SCC comments with regard to traffic sensitivity are noted, the detailed design and timing of roadworks will be agreed with the Highway Authority, exercising its powers under the Traffic Management Act 2004 to secure the safe and expeditious movement of traffic.



ID	Written Representation	Applicants' Comments
36	3.39 The delivery routes for HGVs (paragraph 50) would not be expected to differ from those proposed for the construction of the on shore works. The LHA's preference is for construction traffic required for the construction of the site accesses to be managed in the same way as the main construction work as detailed in the OCTMP. Additional measures are required than those listed in paragraph 51 to enable compliance with the agreed delivery plan in terms of providing contact details for the public and LHA.	Delivery routes may differ for onshore site preparation works as the haul road would not be in-situ. Paragraph 30 secures approval of appropriate routes.
Deadline 3 Submission - 8.9 Outline Construction Traffic Management Plan (Tracked) - Version 02 REP3-033		
37	3.40 The LHA would suggest that the communication channels referred to in paragraph 30 include modern platforms such as twitter and facebook that can provide real time information. It is also suggested that local County and District Councillors are contacted in addition to Parish Councils (paragraph 31).	The Applicants are committed to providing regular updates and the transport coordinator is responsible for acting as a point of contact for the local community. The detail of this will be agreed in the final CTMP.
38	3.41 The LHA considers that the measures in the outline CoCP should also be applicable to the construction of the site accesses forming part of the onshore preparation works.	The Applicants are considering this point and will provide a response at Deadline 6.
39	3.42 Sizewell Gap will be used by Sizewell C construction traffic in the early part of the construction program. Wherever possible any work on Sizewell Gap described in paragraph 132 should also be planned to avoid peaks in construction traffic for the Sizewell B relocation or Sizewell C construction if these projects are concurrent with EA1(N) or EA2. The applicant should also liaise with the Sizewell C construction team.	Noted. The <i>Draft Statement of Common Ground NNB Generation Company (SZC) Limited</i> (REP1-061) includes an agreed statement at ID SZC 501 confirming that the Applicants and Sizewell C will engage regularly with each other during design and construction of their respective projects.

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40	3.43 Under the terms of SCC's S278 agreements the applicant will be responsible for the maintenance of those parts of the public highway within their site boundaries as defined by the red line. The agreement includes the applicant indemnifying the authority against any claims arising from third parties during the occupation of the 'site'. Therefore, the measures proposed in paragraph 132 will apply to all parts of the project occupying the public highway. Notwithstanding this the LHA will require access to inspect and maintain the public.	The Applicants are currently discussing with SCC the practicalities for discharging requirements, managing orders and supervision and recovery of costs.
41	3.44 The applicant should note that inspections and maintenance shall extend to any associated footways, cycleways or verges within the areas under the applicant's control. This may include sweeping of footways/ cycleways in addition to carriageways. Details of maintenance standards including detail of inspection frequencies and intervention criteria can be found at https://www.suffolk.gov.uk/assets/Roads-and-transport/how-we-managehighway-maintenance/v2.0-HMOP-2019-Final-Live-15-07-19a.pdf . These standards should be treated as the minimum acceptable criteria.	Noted.
Deadline 3 Submission – 8.11 Outline Travel Plan (Tracked) - Version 02 REP3-037		
42	3.45 As set out at Table 26.26 of the Environmental Statement, mitigation for Driver Delay impacts at Junction 3 included measures to manage employee traffic. Further clarification is needed on how the measures outlined in Table 2.2 of the OTP specifically reduce vehicles travelling through junctions during peak periods beyond the 1.5 employees per vehicle car share that has been assessed within the Environmental Statement as it is understood that this formed the assessed impact from which additional management was deemed understood to be required.	Paragraph 41, Outline Travel Plan (REP3-036) notes the forecast traffic flows represent the maximum quantum noting a number of construction variables such as, the intense sequencing of construction activities, an overlap employee start and finish times with peak hours and vehicle origin and destinations. To secure appropriate travel plan measures, paragraph 43 secures a commitment by the Applicants to a final Travel Plan with an updated impact assessment for junctions 1 and 3 (using the contractor information on personnel numbers, construction programme and travel routes) to

ID	Written Representation	Applicants' Comments
		establish if further mitigation is required and if so, during what construction periods.
	3.46 Paragraph 50 should include a commitment by the applicant to submit the quarterly Travel Plan monitoring report to the Council and to upload onto a public website.	Please see response to ID24.
Deadline 3 Submission - ExA.HA.D3.V1 EA1N&EA2 Applicants Responses to Hearings Action Points (ISH1, CAH1, ISH2) - Version 01 REP3-083		
43	3.47 In response to question 6 the applicant states 'No further information regarding cumulative traffic and transports impacts with Sizewell C is proposed'. This appears contrary to the response at deadline 2 that acknowledged more transport data is likely to come forward as part of the SZC application and stated that 'the Applicants are also aware of recently proposed changes (Planning Inspectorate reference no. EN010012) to the SZC DCO application following engagement with SCC and other stakeholders. It is understood that a SZC DCO addendum will set out proposals for SZC to increase the import of materials by rail and sea with the objective of reducing the amenity impacts of Heavy Goods Vehicle (HGV) traffic. Once the SZC addendum becomes available, the Applicants will review the materials to determine if further updates to their CIA for the Projects are necessary. It should also be noted that at this stage it is unknown whether the changes to the SZB Relocated Facilities project are likely to alter the associated traffic flow figures contained within the SZC DCO application; the SZB traffic flow figures used for this clarification note are those contained within the SZC DCO application'. The Council requests that additional assessment is undertaken or if not its omission is reasonably justified.	Please refer to the <i>Applicants' Responses to Hearings Action Points (ISH3, ISH4, ISH5, ISH6)</i> (ExA.HA.D5.V1), Agenda Item 5c .

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Deadline 3 Submission - 6.3.6.4 EA1N Environmental Statement - Appendix 6.4 - Cumulative Project Descriptions (Tracked) - Version 02 REP3-022		
44	3.48 SCC would like the applicant to clarify if all 4 transition bays and 19 jointing bays will be constructed in the scenario 2 sequential construction, as in Scenario 1, as 'installation of onshore cables' reference is made to completion of EA2 requiring new joint bays apparently contradicting row 'cable jointing and jointing pits'. The latter process mirrors that for EA3 where ducting was constructed as part of EA1 but not jointing bays.	Each project requires 2 jointing bays at each of the 19 locations. Cumulatively there will be 4 jointing bays at each of the 19 locations regardless of the cumulative scenario.