



The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 7 – 4 March 2021

Comments of Suffolk County Council as Local Highways Authority

1. Comments on responses to ExQ2 (if required)

Comments on Applicants' Response to ExQ2 Volume 8.2.18 Transport and Traffic

- 2.18.1 b) to clarify the LHA position it is the Applicant that concluded an average speed camera met the stated objectives and provided the best solution for an enhanced road safety scheme. The LHA did not concur with the effectiveness of speed cameras as the majority of collisions involve drivers turning right onto the A1094 and not controlled by such a measure.
- 2.18.2 The LHA is of the opinion that the main impact of the project at the A12/A1094 was the increased risk to the safety of road users and this was of higher importance than highway capacity. Notwithstanding this the LHA is satisfied that the impact on highway capacity is acceptable (REP5-055). The LHA notes that there appears to be incomplete text in the penultimate paragraph of the Applicant's response when referring to the OCTMP.
- 2.18.3 The LHA has provided a copy of the Authority's generic s278 agreement for their consideration.
- 2.18.4 Within the s278 agreement the LHA require road safety audits to be completed. While this agreement is primarily for delivery of permanent highway infrastructure the potential for this temporary measure to remain in place for a number of years means that the LHA will require safety audits. This is commensurate with the Applicants commitment in paragraph 103 of the OCTMP. If traffic speeds are a concern the s278 agreement would be a mechanism by which the Applicant can be required to undertake surveys or remedial measures to control speeds if applicable.
- 2.18.5 The LHA would make two comments on the Applicants response to ALL movements. Firstly, if additional sub stations are permitted in the Friston area ALL movements may not be infrequent. It cannot be assured that any other substation transformers will be 'designed not to fail' (cf Applicant's response at 2.18.9(a)) or that any other equipment will be sized so as not to entail a need for ALL movements. Secondly, the LHA is already aware of a planning application that will impact on the proposed route (Application DC/20/5181/OUT) <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=QLJLNMQXGSW00&activeTab=summary>) This application is based on an extant 2016 permission that included traffic islands to enable pedestrians from the development to safely cross Abbey Road. Acknowledging that this may reduce the lane widths and hence affect restrict future ALL movements it may be necessary to use measures such as removable islands to enable wide loads movements in the future although there will be cost implications for both the applicant and the

developer. The LHA considers that the matter should be brought to both the LPAs attention for this development and the ExA to demonstrate the risks posed to use of this route to the substation.

- 2.18.6 The LHA comments on cumulative impact assessment are included in the response (below) to Clarification Note 'Sizewell Projects Cumulative Impact Assessment (Traffic and Transport)' submitted by the Applicants at Deadline 6 of the Examination.
- 2.18.8c) The HR100 heavy loads route does not have any protection in terms of legislation and only limited protection through the DoT Roads Circular 61/72 (<https://webarchive.nationalarchives.gov.uk/20100303222626/http://www.dft.gov.uk/pgr/roads/tpm/tal/circulars/ular6172routesforheavyan4064.pdf>) which does not extend to the route south of Lovers Lane . HR100 remains a 'preferred 'route. In terms of new routes, the DfT advice is *If you have a suggestion for a new route, or a change to a route, to be considered for the high and heavy loads grid please contact Highways England's abnormal loads team. Newly suggested routes will need to be equal to or greater than the specifications of the existing routes. The suggestions must also be to or from locations with a critical need to move loads of this nature or be on regularly used routes.* <https://www.gov.uk/government/publications/preferred-routes-for-high-and-heavy-abnormal-load-movements>
Until such time as there is certainty regarding the use of the Friston area for sub-stations the LHA is not in a position to determine if this route is either critical or likely to be used regularly.
- 2.18.12 It is usual for the 'Stop Works' method of traffic management to be used for street works rather than to control traffic for the movement of large loads. The LHA is reviewing its position on this method. If the applicant has examples where this method has been used and accepted by the police and LHA this would be appreciated.
- 2.18.14 The LHA would concur with the Applicant that routing traffic via the B1122 and B1069 via Leiston would impact more residential areas than the A1094 route. While the proposed Sizewell Link Road may reduce the impacts on Yoxford, Middleton and Theberton the route would still pass through Leiston and Knodishall.
- 2.18.15 The LHA notes that similar crossings to that proposed on the B1353 were used during construction of EA1 without any known problems.
- 2.18.16 The LHA notes that bullet point three should read direct access from Sizewell Gap at access 2 not from Snape Road at access 2. Due to the constrained site at access 3 and 4 the LHA would agree that entry / exit movements at this point should be kept to a minimum.

2.18.17 The LHA welcomes the additional information regarding the measures that may be necessary to allow heavy loads to cross Marlesford Bridge. Although the Authority accepts the procedure in principle the Applicant will need to provide details of how such measures will be implemented without creating delays to traffic using the A12. The Authority would not consider that traffic restrictions, closures or diversions during the day would be acceptable.

2. Comments on any additional information/submissions received by Deadline 6

Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)

- 2.1 This section forms the Local Highways Authority's (LHA) response to the Clarification Note 'Sizewell Projects Cumulative Impact Assessment (Traffic and Transport)' submitted by the Applicants at Deadline 6 of the Examination located here:[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004035-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004035-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf). These comments form a response to matters relating to the Cumulative Impact Assessment (CIA) of 'Traffic and Transport' only and does not provide comments on areas impacted by 'Traffic and Transport' such as air quality, and noise and vibration, which form part of other workstreams.
- 2.2 At Paragraph 24 of the CIA, the Applicants set out that eight links were screened out of the DCO Environmental Statement. These links have also been screened out of the CIA on the basis that they were screened out of the original assessment. It is not understood why these links would automatically be screened out for a CIA; the potential exists that the combination of impacts across the projects might result in an impact that triggers the original screening thresholds, that does not occur when looking at the Applicants' projects impacts in isolation. As indicated at paragraph 5.2 of our Deadline 5 Response (REP5-055), the LHA disagrees with dismissing impacts on this basis.
- 2.3 It is noteworthy that Link 9 (B1069 north of junction with A1094) is the only link at 'Table 2.4 Pedestrian Amenity (Scenario A)' where a potentially significant impact has not been identified. It is understood that this is because the receptor has a low sensitivity, but the Magnitude of Effect of the impact is 'Medium'. As no criteria exists to determine where the differentiation is between a 'Medium' and 'High' Magnitude of Effect in 'Pedestrian Amenity' this is a judgement made by the assessor, as set out in their response at ID4 of REP4-025 and inherently brings a small, in this case, level of risk to the conclusions of the assessment as they are not being based on a quantifiable metric.
- 2.4 There is a similar issue at 'Table 2.5 Pedestrian Amenity (Scenario B)', where Links 9 (B1069 north of junction with A1094) and 12 (Sizewell Gap) also have Magnitude of Impacts determined to be 'Medium' based on 131% and 166% changes in HGV numbers in Scenario B, as to how you define a High Magnitude

of Effect, which would change the potential significance of the impact. Again, as set out at ID5 REP4-025, this is a judgment made by the assessor and inherently brings a small, in this case, level of risk to the conclusions of the assessment as they are not being based on a quantifiable metric.

- 2.5 At Paragraph 37 of the CIA the potential for a Moderate Adverse Impact on Yoxford in the Early Years is identified. The LHA welcomes the proposed mitigation as set out at Paragraph 41 to mitigate the Projects' proportional impact at this location.
- 2.6 At Paragraph 48 of the CIA potentially significant cumulative impacts at Marlesford are identified. The LHA welcomes the proposed mitigation as set out at Paragraph 50 to mitigate the Projects' proportional impact at this location. Due to the significant works proposed by EDF on Lovers Lane it is agreed that no practical mitigations measures are deliverable at this location in addition to those proposed by EDF.
- 2.7 As set out in our Deadline 3 Response (REP3-102), the LHA looks for the applicant and Sizewell C Company to continue to work cooperatively and to minimise the potential for project interference and associated impacts on the highway network. It is noted that the parties have entered into a Statement of Common Ground on this matter.
- 2.8 As per paragraph 5.3 the LHA's Deadline 5 Response (REP5-055) we remain concerned that in-combination effects on communities are not being identified.

Outline Travel Plan

- 2.9 At Deadline 6 an updated Outline Travel Plan was submitted by the Applicant (found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004022-8.11%20EA1N%20Outline%20Travel%20Plan.pdf>).
- 2.10 With regards to the additional text inserted at Paragraph 7 regarding reference to the Outline Port Construction Traffic Management Plan, it is not understood what is meant by 'potation' traffic generated or whether this is a typo. Please can this be clarified.
- 2.11 The LHA welcomes the commitment to submitting to the councils the contact details of relevant transport coordinators prior to commencement of construction, as set out at paragraph 21.
- 2.12 The LHA welcomes the commitment to entering into a Planning Performance Agreement for a number of elements of the project, including monitoring final management plans as set out at paragraph 23. However, until such time as this is agreed to the Authority's satisfaction SCC maintains its position regarding the necessity of Protective Provisions. The LHA has made comments on this in the response to the Outline Access Management Plan within this document.

- 2.13 The LHA welcomes the commitment to publishing a record of all incidents in the quarterly report, as set out at paragraph 50.
- 2.14 The LHA welcomes the commitment to publishing the quarterly monitoring report as set out at paragraph 50, which addresses our comment raised on this issue at paragraph 3.46 in our Deadline 4 response (found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003503-SCC%20Highways%20Deadline%204.pdf>).

Outline Construction Traffic and Management Plan

- 2.15 At Deadline 6 an updated Outline Construction Traffic and Management Plan was submitted by the Applicant (found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004040-ExA.AS-9.D6.V2%20EA1N%20Outline%20Port%20Construction%20Traffic%20Management%20and%20Travel%20Plan.pdf>)
- 2.16 With regards to the additional text inserted at Paragraph 7 regarding reference to the Outline Port Construction Traffic Management Plan, it is not understood what is meant by 'potation' traffic generated. Please can this be clarified.
- 2.17 The LHA welcomes the commitment to submitting to the councils the contact details of relevant transport coordinators prior to commencement of construction, as set out at paragraph 20. Reference is made to consultation with the relevant planning authority. For consistency with the OPCTMP this should be in consultation with the relevant local highway authority and relevant planning authority.
- 2.18 The LHA welcomes the commitment to entering into a Planning Performance Agreement for a number of elements of the project, including monitoring final management plans as set out at paragraph 22. The LHA has made comments on this in the response to the Outline Access Management Plan within this document.
- 2.19 The LHA welcomes the inclusion of the forecast figures for HGV movements provided at Table 2.1 and Table 2.2. However, it needs to be ensured that adequate monitoring is in place on HGV routeing to ensure that the figures assessed in the ES are not exceeded.
- 2.20 The LHA assumes that paragraph 44 refers to Requirements 23 and 24 in the dDCO which states what construction activities may take place outside normal working hours.
- 2.21 While the LHA welcomes the proposed measures to control out of hours movements set out in paragraph 54 it does not fully resolve all our concerns. The

location of waiting or parking areas for drivers should be agreed with the LHA to avoid selection of unsuitable sites. Opening up of the site before 0700 may address concerns of HGVs arriving early stopping on the highway near the site, but does not control overnight movements of HGVs through local communities.

- 2.22 The LHA remains concerned that large delivery vehicles may park at unsuitable location and / or travel through local communities between 1900 and 0700 (weekdays) or 1300 Saturday to 0700 Monday.
- 2.23 The LHA welcomes the commitment at paragraph 62 that non-special order abnormal loads would be subject to the same delivery route restrictions as HGVs. Paragraph 60 notes that special order AIL movements would be outside normal time restrictions. The Authority would ask that the Applicant confirms that this is acceptable to the police, as escorted loads are usually restricted to daylight hours.
- 2.24 The LHA welcomes the commitment at paragraph 64 to a 70% Euro-VI standard HGV fleet should the project overlap with Sizewell C. As part of the record of HGVs delivering to site (paragraph 127) the Applicant should include the contractor and / or origin of the journey to assist in calculating those vehicles going through the Stratford ST Andrew AQMA.
- 2.25 The improvements to the A1094 / B1069 Friston junction (work no. 35) is planned to be delivered before needed for movement of the transformers (paragraph 72). If not completed before commencement, or even onshore preparation works, this is likely to disrupt movements to the site access south of Knodishall.
- 2.26 In discussions with the LHA the Applicant has not yet linked delivery of the A12/A1094 Friday Street works to specific work nos. The LHA view is that this safety scheme needs to be in place before any significant movements are generated through this junction. This would include works no 19 to 21 (if accessed from the B1122 / A1094), works 22, 23, 26, 30, 31,32, 33, 34 and 38 to 43, all of which use the A1094 and B1069 for access. The same rationale should be applied to the Snape Mitigation Scheme (paragraph 91 and Marlesford Mitigation Scheme (paragraph 95). This is so that the risks posed by additional project vehicle movements are mitigated and that construction does not interfere with these movements.
- 2.27 The traffic signals will be removed on completion of the later of the two projects or the roundabout associated with the SZC two village bypass (as paragraph 76), whichever is the sooner.
- 2.28 The LHA welcomes the additional information regarding the measures that may be necessary to allow heavy loads to cross Marlesford Bridge. Although there the Authority accepts the procedure in principle the Applicant will need to provide details of how such measures will be implemented without creating delays to traffic using the A12. The Authority would not consider that traffic restrictions, closures or diversions during the day would be acceptable.

- 2.29 The Applicants should not commence works nos 6, 8, 9, 11, 12, 13, 16, 17 and 18 and possibly 19 (if accessed from Sizewell Gap) until the Theberton Mitigation Scheme, not just works no 11 and 13 as stated in paragraph 87 as all these works are accessed off the Sizewell Gap and hence require construction traffic to pass through Theberton.
- 2.30 In principle the Council welcomes inclusion of the Marlesford and Yoxford Amenity improvements to mitigate the cumulative impacts in combination with Sizewell C although some minor detailed design matters are still to be agreed. The LHA is of the view that there will be a point in time at which the likelihood of the temporal impact referred to in paragraphs 93 and 97 can be assessed and that time is immediately after a decision is made by the Applicant and EDF to proceed with the projects, if permitted.
- 2.31 In paragraph 100 the LHA would still prefer the 'where required' is removed as this is considered the appropriate mechanism for technical approval.
- 2.32 The LHA considers that a temporary 40mph speed limit will be required for the duration of the traffic signal control of the A12/A1094 junction. And accepts that these restrictions will be implemented, subject to the due legal consultation and objection process, by SCC.
- 2.33 The LHA preference is for trenchless methods of installation for the drainage under Church Road (paragraph 109) and the crossings of the B1353, B1122, B1069, Cloe Lane and Grove Road (paragraph 112). If the Applicant uses open cut trenches it is likely that reconstruction of parts of the carriageway and any adjacent footways will be necessary due to the inherent difficulties of backfilling trenches to avoid settlement. The LHA remains concerned whether the Applicants proposed method of traffic management (paragraph 114) is deliverable for the reasons set out in 3.2 to 3.7 of our deadline 4 response (REP4-065).
- 2.34 Paragraph 121 sets out that where it is available, information on GPS tracking of HGVs, as part of monitoring of routeing, will be made available to the transport coordinators. The LHA still considers that GPS tracking is the most robust method of tracking HGVs. While appreciating the Applicants concerns that this could exclude small delivery companies due to cost of the equipment this has not been evidenced.
- 2.35 The LHA welcomes the commitment to publishing the quarterly monitoring report as set out at paragraph 130 which addresses our comment raised on this issue at paragraph 3.27 in our Deadline 4 response (found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003503-SCC%20Highways%20Deadline%204.pdf>).
- The LHA welcomes at paragraph 132 the inclusion of failure to achieve the required EURO-VI standard as a breach. The LHA welcomes the inclusion of

construction HGV traffic not parking in designated areas as a breach, but information is sought on how this is planned to be monitored.

Outline Access Management Plan

2.36 At Deadline 6 an updated Outline Access Management Plan was submitted by the Applicant (found here:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004020-8.10%20EA1N%20Outline%20Access%20Management%20Plan.pdf>).

2.37 The LHA welcomes the commitment to entering into a Planning Performance Agreement for a number of elements of the project, including monitoring final management plans as set out at paragraph 12. However, until such time as this is agreed to the Authority's satisfaction, SCC maintains its position regarding the necessity of Protective Provisions. A number of alterations (in italics) are proposed to paragraphs 12 and 13.

12. The Applicants have agreed to enter into a Planning Performance Agreement (PPA) with SCC. The PPA will allow SCC to recover reasonable costs for activities including but not limited to the following:

- Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway;
 - Visual and structural condition surveys of the highway (A1094, B1069, B1122, Lovers Lane, Sizewell Gap and parts of A12) and contributions towards structural repairs ~~inspection of highway and SCC review of inspection reports;~~
 - ~~Structural~~ Surveys *and assessment of highway structures* to facilitate ALL movements;
 - Damage to the Highway (in accordance with the provisions of Section 59 Highways Act 1980);
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 - Creation of temporary traffic regulation orders (including SCC consultation and issue of permits);
 - ~~Assessments of highway structures;~~
 - Relocating / removing street furniture and all other highway infrastructure to *facilitate ALL movements;*
 - *Technical approval and inspection of highway accesses (requirement 16) and offsite highway works as detailed in the approved construction traffic management plan.*
- and
- Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PRoW Strategy etc).

2.38 Section 59 of the Highways Act 1980 sets out a mechanism to allow the LHA to recover expenses of maintaining a highway that are due to 'extraordinary traffic' but in cases of dispute requires in section 59(2) 'such expenses as may be proved to the satisfaction of the court...' The LHA would seek to avoid this a need for protracted disagreement on such a matter. Section 59(3) allows the issue to be resolved by prior agreement, and the LHA considers that this is a preferable approach and seeks confirmation from the Applicants through agreement that damage is defined as defects described in the authority's Highways Maintenance

Operational Plan and restricted to agreed HGV or AIL access roads.
<https://www.suffolk.gov.uk/assets/Roads-and-transport/how-we-manage-highway-maintenance/v2.0-HMOP-2019-Final-Live-15-07-19a.pdf>

13. In undertaking works on the public highway, the Applicants shall ensure through appropriate agreements and approvals that:

- The areas of the public highway occupied pursuant to Articles 12, 13 or 15 of the DCO are maintained *to the standards defined in SCC's Highways Operational Management Plan* ~~reasonable satisfaction of the SCC (as the local highway authority) (taking account of the category of highway asset use to which it is currently being put)~~ during that period of occupation.

- The Applicants shall ensure that *the periods and physical extents of occupation are defined, and that SCC is protected* ~~SCC is provided reasonable protection~~ against third party claims caused by the Applicants' occupation of the public highway pursuant to Article 12, 13 or 15 of the DCO.

- In seeking to temporarily stop up, alter, divert or use as a temporary working site a street to which Article 12(5)(c) of the DCO applies, *the Applicants shall* allow a reasonable *advance* notice period *with a minimum of 8 weeks*, (guidance2 suggests three months notice in certain circumstances)

- *That the notwithstanding the above LHA is not unreasonably refused access to inspect or maintain the highway in accordance with its duties under the Highways Act 1980.* ~~SCC shall be provided with the ability to inspect the public highway with reasonable access during the works.~~

2.39 The LHA presumes that the reference to the turn from B1122 into access 13 in paragraph 28 should be the B1121.

2.40 Paragraph 29 states that abnormal loads using accesses 1, 2, 5, 6, 9 and 10 will require pilot vehicle escort to allow vehicles to straddle lanes for access. The LHA considers that a method statement will be required to understand how this operation will be performed safely.

2.41 In 'Table 2.3 Access Visibility Requirements' a speed reduction is stated as being necessary for access 13 during construction but not when during the operational phase. The LHA understands from Table 2.1 that this access will only be used by special order movements. The Authority seeks clarification from the applicant that its understanding of the use of access 13 is correct.

2.42 The LHA accepts the Authority will raise the necessary legal orders for temporary speed limits or other restrictions using its statutory powers (paragraph 39 and 45) provided that the necessary agreements are in place to recover its reasonable expenses (as paragraph 12).

2.43 The wording of paragraph 42 'in accordance with the provisions of DCO Requirement 16' are acceptable to the LHA provided that the wording of paragraph 12 above is accepted by the Applicant.

- 2.44 The LHA accepts that road safety audits should comply with the principles of DMRB GG119 although does note that any departures from design standards should be brought to the auditors' attention as part of this process.
- 2.45 Paragraph 51 does not address how pedestrians will be protected during construction of accesses.
- 2.46 The LHA does not object to the principle of a temporary reduction in speeds to 30mph, but notes that signing in isolation may not ensure adequate compliance with these restrictions.
- 2.47 The proposed measures to safeguard access to Sizewell as set out in paragraph 55 to 59 would be acceptable to the LHA.
- 2.48 The proposal of an Onshore Preparation Works Management Plan is welcomed by the LHA, although we would consider many of the measures such as HGV routes and restrictions on access should follow the same principles included in the OCTMP. The proposal to keep SCC informed of the contractors' representative is welcomed.
- 2.49 The LHA would ask that the Applicant clarifies paragraph 74. This appears to state that operational access to the substation via the B1121 will require large vehicles to arrive and depart from the A1094 east of the B1121. As there are no suitable locations on the A1094 to turn large vehicles this implies that they will need to use the B1069 and B1122. The LHA would request that the Applicant examines the practicality, or otherwise, of modifying the A1094/B1121 junction within the limits of the existing public highway.

Outline Port Construction Traffic Management and Travel Plan Management Plan

- 2.50 At Deadline 6 an updated Outline Port Construction Traffic Management and Travel Plan was submitted by the Applicant (found here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004040-ExA.AS-9.D6.V2%20EA1N%20Outline%20Port%20Construction%20Traffic%20Management%20and%20Travel%20Plan.pdf>)
- 2.51 The LHA welcomes the agreement in paragraph 8 to liaise with the Authority regarding the impact of port construction vehicles within SCC's administrative boundary. However, the LHA considers that the suggested wording is imprecise and needs to be improved. The LHA is disappointed to note that in the Applicants' Comments on SCC's Deadline 5 submissions, (as also submitted at Deadline 6), the Applicants state (item 2.1 ID6) it is to be left to the highway authority for the (non-Suffolk) port to determine whether to consult with SCC (or any other highway authority) on the final PCTMP. There is therefore a mismatch between the Applicants' formal position, as secured by the DCO Requirement 36, and the terms of the OPCTMTP. SCC considers that there is a need both for

Requirement 36 and the OPCTMTP to spell out an explicit need for consultation with SCC as LHA. Clearly, if port construction traffic would have no implications for the local highway network in Suffolk (because the selected port was remote from Suffolk), then SCC's consultation response would be to that effect. However, whilst the Applicants wish to maintain the flexibility of not specifying a port at this stage, and it is clear that there are non-Suffolk ports only a short distance from Suffolk (including Great Yarmouth), it is important that SCC is consulted on the PCTMTP.

- 2.52 With regard to paragraph 16, the LHA has commented on the assessment methodology in the LIR and subsequent submissions, noting that it is reliant on subjective interpretation of local conditions (REP3-039). Notwithstanding this position the Authority notes that SPR have been willing to consider the LHA's views when undertaking these assessments and reaching a mutually agreed position.
- 2.53 The authority would accept a sustainable transport audit (paragraph 18) provided the findings can be meaningfully communicated to workers and opportunities taken (paragraph 24) to reduce travel by car.
- 2.54 Care should be taken that this project, when considering the permitted port development traffic in paragraph 27, takes due consideration of other permitted projects collocated at the relevant port. The LHA also notes the proposed screening exercise for air quality and noise (paragraph 29 and 30) but would defer to ESC who are the responsible authority for these matters.
- 2.55 The LHA welcomes the commitment at Paragraph 30 to submitting a screening report as to ascertain the requirement for a Transport Assessment.

Outline Code of Construction Practice

- 2.56 The LHA welcomes the Applicants commitment to enter into a Planning Performance Agreement as stated in paragraph 17.
- 2.57 The LHA recognises the necessity of undertaking some activities such as concrete pours outside normal working hours but would expect that this should be avoided when possible. The LHA understands that police only escort AILs during daylight hours for safety reasons.

Written Summary of Oral Case ISH9

Applicants: East Anglia TWO Limited and East Anglia ONE North Limited
Document Reference: ExA.SN4.D6.V1 SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001236 Rev 01

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-004062-ExA.SN4.D6.V1%20EA1N&EA2%20Written%20Summary%20of%20Oral%20Case%20ISH9.pdf>

2.58 Provided the Applicant accepts that sufficient notice needs to be given to the LHA to undertake certain legal actions associated with street works and this is reflected in a planning performance agreement the Authority would withdraw its request to increase the 28 day period for deemed approval in articles 12, 13 and 15.

Applicants' Comments on SCC's Deadline 5 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited Document Reference: ExA.AS-18.D6.V1 SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001246

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-004048-ExA.AS-18.D6.V1%20EA1N&EA2%20Applicants'%20Comments%20on%20Suffolk%20County%20Council%E2%80%99s%20Deadline%205%20Submissions.pdf>

2.59 The matters raised in this document have been addressed elsewhere in this document.

3. Responses to any further information requested by the ExAs for this deadline

3.1 Not applicable