



East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Marlesford Parish Council's Deadline 8 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-14.D9.V1

SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001043

Date: 15th April 2021 Revision: Version 1

Author: Royal HaskoningDHV

Applicable to East Anglia ONE North and East Anglia TWO







Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	15/04/2021	Paolo Pizzolla	Lesley Jamieson / Ian Mackay	Rich Morris

	Description of Revisions			
Rev	Page	Section	Description	
01	n/a	n/a	Final for submission	





Table of Contents

1	Introduction	1
2	Comments on Marlesford Parish Council's Deadline 8 Submissions	2





Glossary of Acronyms

AIL	Abnormal Indivisible Load	
CoCP	Code of Construction Practice	
CTMP	Construction Traffic Management Plan	
DCO	Development Consent Order	
ES	Environmental Statement	
SCC	Suffolk County Council	





Glossary of Terminology

Applicant	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 ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
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.
East Anglia TWO	The offshore area within which wind turbines and offshore platforms will
windfarm site	be located.





1 Introduction

- 1. This document presents the Applicants' comments on Marlesford Parish Council's Written Summary of Oral Case Issue Specific 13 Traffic and Transport (ISH13) submitted at Deadline 8 in relation to transport matters (REP8-199).
- 2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.





2 Comments on Marlesford Parish Council's Deadline 8 Submissions

ID	Marlesford Parish Council Comment	Applicants' Comments
1	In the event that AILs have to be imported at Felixstowe, they will have to pass through Marlesford on the A12 just north of Wickham Market. The bridge over the River Ore in Marlesford is likely to need strengthening in order to allow the passage of the 280t transformer loads. It is anticipated that this could be achieved with a temporary bridge deck laid over the current roadway. Even if the arrangements for the bridge are temporary, they should be carried out so as to minimise disruption to traffic on the A12 through Marlesford and Little Glemham. They should be conducted outside the main holiday summer months and summer weekends avoided.	Noting that the bridge span is 6.1m, the most likely temporary structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days for each transformer delivery, to avoid the requirement to divert traffic. The lead in time for a transformer is between 12 and 24 months enabling advanced notice to be served to all highway stakeholders and a programme to be agreed with Suffolk County Council (SCC) to avoid local major events. The Applicants have secured control measures for potential works at Marlesford Bridge within both the <i>Outline Code of Construction Practice</i> (Outline CoCP) (document refence 8.1) and the <i>Outline Construction Traffic Management Plan</i> (Outline CTMP) (document reference 8.9). The Applicants' consider that sufficient controls are in place to appropriately manage any works at Marlesford Bridge and to reduce the impact on road users
		and the local communities.
2	Marlesford residents live close to the bridge and if evenings and night times are to be used to make temporary alterations to the bridge deck, contractors will need to be mindful of noise and vibration impacts on nearby properties.	The Applicants note that any works to the bridge are classified as defined works (Work No. 37) as part of the authorised development set out within the <i>draft DCO</i> (document reference 3.1). As such, these works would be required to adhere to the measures set out within the final Code of Construction Practice (CoCP), which (pursuant to Requirement 22 of the <i>draft DCO</i> (document reference 3.1)) must accord with the <i>Outline CoCP</i> (most recent version submitted at Deadline 8 (REP8-017)).





ID	Marlesford Parish Council Comment	Applicants' Comments
		Section 9 of the Outline CoCP (REP8-017) includes measures for the control of construction noise and vibration, including core working hours and the use to Best Practicable Means to control construction noise.
		The Applicants' consider that sufficient controls are in place to appropriately manage any works at Marlesford Bridge and to reduce the impact on road users and the local communities.
3	We urge Scottish Power to make a decision on the port of entry for the transformers at the earliest opportunity in order to provide some clarity for local residents and the landowners on whose land the laydown area would be sited.	Highways England, on behalf of the Department for Transport, manage the movement of Abnormal Indivisible Loads (AILs) in England and have a policy known as the 'Water preferred policy' for the transport of AILs. This policy directs that the "nearest coastal port" must be used to minimise the distance AILs are transferred by road.
		Based upon a review of the availability of suitable port facilities by industry heavy haul experts Wynns, ports at Lowestoft and Felixstowe were identified as being the nearest ports that could accommodate AIL deliveries.
		Felixstowe is a greater distance from the onshore development area and was therefore only assessed as a potential contingency in the event that Lowestoft was unavailable. Therefore, in accordance with the water preferred policy, the Applicants promote Lowestoft as a preferred AIL route if available.
		The confirmation on which port will be used can only be provided once orders are placed for transformers and the corresponding delivery schedule is confirmed by the supplier.
4	Community severance is already an issue in Marlesford and Little Glemham with fear and intimidation from current traffic levels being	The <i>Outline CTMP</i> submitted at Deadline 8 (REP8-021), includes the commitment to mitigation measures at Marlesford, known as the Marlesford

¹ Highways England (2019), Water Preferred Policy: Guidelines for the Movement of Abnormal Indivisible Loads, available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799833/WPP_guidelines_2019_DfT_consultation_revision.pdf

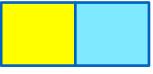




ID	Marlesford Parish Council Comment	Applicants' Comments
	a real concern. We echo the ExA view that Marlesford is "the first unimproved section of the A12 after the dual carriageway section [north of Wickham Market]". We would ask the Applicant to continue its work with Suffolk County Council to ensure the provision of appropriate and proportional mitigation within the village of Marlesford. The Parish Council believe that both stretches of proposed foot path should be on the north side of the A12. Mitigation should take place before construction works begin on the Friston site.	Mitigation Scheme. This scheme has been developed in consultation with SCC and in response to the Parish Councils comments and as such, includes the provision of sections of footway along the northern side of the A12, as preferred by Marlesford Parish Council. As specified within the <i>Outline CTMP</i> (REP8-021) the Marlesford Mitigation Scheme will be in place prior to the commencement of Work Nos. 6, 8, 9, 11, 12, 13, 16 to 23, 26, 30, 31, 32, 34, 38 to 43 (with the exception of the creation of highway accesses).
5	We argue that Marlesford and Little Glemham will both be severely impacted if construction of Sizewell C and EA1N and EA2 go ahead at the same time. We accept that neither consideration of EDF's proposed Two Village Bypass, nor our preferred Four Village Bypass form a part of the Applicants' DCO application, but we strongly argue here (and will do so in the Examination of EDF's plans for Sizewell C) that traffic on the unimproved stretch of the A12 through Marlesford and Little Glemham is already at a level where it causes fear and intimidation. With a likely 115% increase in HGV daily movement at the Sizewell peak, it is unlikely that	The Applicants note that the comments in relation to the Two and Four Village bypass is directed more towards the Sizewell C DCO application submitted by EDF, given that the Sizewell C project is seeking rights to construct the new proposed Two Village Bypass to offset the impacts of the Sizewell C project. The Applicants have undertaken an assessment of the potential cumulative impacts with Sizewell C (REP6-043). This assessment identifies that should there be an overlap of the construction programmes for both the Projects and Sizewell C, that there could be potentially significant amenity impacts along the A12 through Marlesford and Little Glemham.
	mitigation alone could address the adverse impacts. The bypassing of Marlesford and Little Glemham has been on the table since its route was approved in 1995 and most recently a Four Village Bypass was promoted by Suffolk County Council as SEGway (the Suffolk Energy Gateway), but desperately needed funding has not been forthcoming and Marlesford and Little Glemham residents seem destined to have to suffer an intolerable increase in traffic along with its associated noise, air quality and vibration impacts. An additional consideration is that the current design of the Two Village Bypass is likely to preclude a "retro-fit" of a Marlesford and Little	The Applicants have therefore committed to the provision of appropriate and proportional mitigation through the development of the Marlesford Mitigation Scheme. The Applicants do not consider a Two or Four Village bypass necessary to effectively mitigate the Projects impacts – either alone or cumulatively – and note that the proposed bypass is mitigation proposed by the Sizewell C project to offset its impacts alone.
		The <i>Outline CTMP</i> submitted at Deadline 8 (REP8-021), includes the commitment to and detail of the mitigation measures at Marlesford to provide better pedestrian connectivity with Little Glemham (known as the Marlesford Mitigation Scheme). The Applicants note that in order to provide certainty to

Applicants' Comments on Marlesford PC's Deadline 8 Submissions 15th April 2021





ID	Marlesford Parish Council Comment	Applicants' Comments
	Glemham bypass. We urge the ExA to recognise the need for a full, Four Village Bypass to be delivered as one project to address the cumulative impacts of Scottish Power Renewables and Sizewell C traffic and the future forecast traffic increases.	SCC and the local community on the Marlesford Mitigation Scheme, the Applicants have committed to delivering the Marlesford Mitigation Scheme irrespective of whether the Sizewell C project is under construction at the same time as the Projects.