



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 9 – 15 April 2021

Comments of Suffolk County Council as Local Highway Authority

1. Any requests to add supplementary information to documents submitted at Deadlines 5, 6 and 7.

1.1 Not applicable.

2. Comments on the Applicant's updated draft DCO (dDCO) submitted at Deadline 8 (D8). REP8-004

2.1 At D8 SCC submitted its own proposed protective provisions (REP9-175) to be included in Schedule 10 of the dDCO. Subject to some further minor revisions to the text of the OCTMP the OAMP and the OTP in relation to the Planning Performance Agreement, which have been discussed and agreed between the Applicants and SCC and which SCC expects to be put forward by the Applicants at Deadline 9, SCC anticipates that it will be possible to avoid the need for protective provisions. SCC expects to provide a formal confirmation at Deadline 10.

3. Comments on Statements of Common Ground (SoCG) and Statement of Commonality received by D8.

3.1 Not applicable.

4. Comments on any additional information/submissions received by D8.

Outline Code of Construction Practice (REP8-018)

4.1 No additional comments.

Outline Construction Traffic Management Plan (REP8-022)

4.2 Paragraph 23: Proposed changes to planning agreement are acceptable, subject to some further minor revisions which have been discussed and which SCC expects the Applicants to put forward at Deadline 9 (see para 3.35 below).

4.3 Paragraph 24: Proposed changes to appropriate approvals are acceptable.

4.4 Paragraph 46: Proposed changes to control of HGV routes are acceptable.

4.5 Paragraph 49: Proposed changes to control of HGV routes (B1122) are acceptable.

4.6 Paragraph 54 and 55: Proposed changes to control movements at the A1094/B1122 junction at Aldeburgh and access 5 and 6 are accepted as appropriate.

4.7 Paragraph 58: The applicant should note that the LHA would not permit overnight parking or waiting on the local highway network, but otherwise the measures are acceptable.

- 4.8 Paragraph 80 and 83: Accepted that Work No. 36 is required before Additional Works Nos. 19 to 23, 26, 30, 31, 32, 34, 38 to 43, excepting creation of highway accesses is acceptable.
- 4.9 Paragraph 88: It is accepted that the design of the footway amenity schemes are 'in principle' acceptable, but that amendments may be required and that these will be agreed with the LHA.
- 4.10 Paragraph 92: It is accepted that the applicants will not commence Work No. 6, 8, 9, 11, 12, 13, 16, 17, 18, 19 north of Hundred River, (with the exception of the creation of highway access) until mitigation in accordance with the Theberton Mitigation Scheme is completed.
- 4.11 Paragraph 97: It is accepted that the applicants will not commence Works Nos. 19 south of Hundred River, 20 to 23, 26, 30, 31, 32, 34, 38 to 43 (with the exception of the creation of highway accesses) until mitigation in accordance with the Snape Mitigation Scheme is completed.
- 4.12 Paragraph 101: It is accepted that the applicants will not commence Works 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) until mitigation in accordance with the Marlesford Mitigation Scheme is completed.
- 4.13 Paragraph 105: It is accepted that the applicant will not commence Works 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) until mitigation in accordance with the Yoxford Mitigation Scheme is completed.
- 4.14 Paragraph 115: The LHA accepts the proposal that the traffic management are developed and agreed with the LHA prior to construction.
- 4.15 Paragraphs 125 to 127: The LHA supports the proposals to use ANPR as a measure to support a booking system to record HGV movements.
- 4.16 The proposed measures to monitor delivery vehicles to ensure NO₂ levels do not exceed the prescribed threshold in Stratford St Andrew as detailed in paragraphs 137 to 143 are acceptable to the LHA.
- 4.17 Table 5.1, installation of the APNR cameras should be at commencement of the construction works as this forms key part of the monitoring system.

Outline Access Management Plan (REP8-024)

- 4.18 Paragraph 4: It is accepted that SCC approves the AMP in consultation with the relevant planning authority.
- 4.19 Paragraph 9: Noted that there are five public highway accesses (1, 2, 9, 10 and 13) and four haul roads. It would be useful for the applicant to clarify the

details of the four haul roads and the LHA notes the temporary use of accesses 5 and 6 (paragraph 29).

- 4.20 Paragraph 13 and 14: Proposed changes to planning agreement and appropriate agreements and approvals are acceptable, subject to some further minor revisions which have been discussed and which SCC expects the Applicants to put forward at Deadline 9 (see para 3.35 below).
- 4.21 Paragraph 23 to 25 and 29: Proposed changes to control of HGV routes (B1122) are acceptable.
- 4.22 Paragraph 34: The LHA notes the proposal for a method statement in the Onshore Preparation Works Management Plan to control safe entry and egress. This document is within the CoCP approved by the LPA and the LHA would expect to be consulted on these proposals. The applicant should confirm whether these method statement will be the same for ALL movements in the construction phase.
- 4.23 Table 2.3: The LHA notes the visibility to signal heads of 120m as shown on drawing TP-PB4842-DR008.
- 4.24 Paragraph 56: the LHA considers that a minimum width of footway should ideally be 1.5m with an absolute minimum of 1.0m where this cannot be achieved (as stated in code of practice for streetworks https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321056/safety-at-streetworks.pdf).

Outline Travel Plan (REP8-026)

- 4.25 Paragraph 5: It is accepted that SCC approves the Travel Plan in consultation with the relevant planning authority.
- 4.26 Paragraph 24 and 25: Subject to some further minor revisions to the text of the OCTMP the OAMP and the OTP in relation to the Planning Performance Agreement, which have been discussed and agreed between the Applicants and SCC and which SCC expects to be put forward by the Applicants at Deadline 9, SCC anticipates that it will be possible to avoid the need for protective provisions. SCC expects to provide a formal confirmation at Deadline 10.

Applicants Comments on SCC's Deadline 7 Submissions (REP8-046)

Section 2.3: Suffolk County Council as Highway Authority

- 4.27 ID2: Incomplete text has been completed. No further comment
- 4.28 ID3: SCC confirm that a draft s278 agreement has been completed and accept this will be secured by the OCTMP.

- 4.29 ID5: The LHA note the applicant's response and that this matter remains as a matter not agreed in the SOCG. The LHA notes that if the development (Planning Application reference: DC/20/5181/OUT) is constructed it is not in a position to secure removable traffic islands on the B1122 Abbey Road and that the costs of removal and replacement may be passed onto the applicant if this is required to allow for their AIL movements. See proposed access arrangement plan
<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01610645.pdf>
- 4.30 ID7: As ID5.
- 4.31 ID8: The LHA accepts that use of STOP-WORK signs is acceptable.
- 4.32 ID12: The LHA notes the comments regarding use of single lane working over a period of 2 days and that this will avoid daytime traffic sensitive restrictions. In effect this would restrict such work to weekends (but not weekends in summer peak periods) if the A12 is in use by either SZC or SPR construction traffic.
- 4.33 ID13: Noted. No further comment.
- 4.34 ID21: Noted. No further comment.
- 4.35 ID23: The proposal of a planning agreement is accepted by the LHA, subject to minor changes in text in the OCTMP, OAMP and OTP. It is understood that these changes will be made at deadline 9.
The Applicants will not undertake any works to any highway or highway asset that is the responsibility of SCC until a Planning Performance Agreement (PPA) has been agreed with SCC, "both parties acting reasonably and in good faith", which will allow SCC to recover reasonable costs including but not limited to
(Any dispute or difference arising in connection with the terms of the proposed PPA-between the Applicants and SCC, shall be referred to arbitration in accordance with Article 37 of the Order).
- 4.36 ID26: Noted.
- 4.37 ID27: Noted and acceptable.
- 4.38 ID28: See ID23.
- 4.39 ID31: The LHA accepts the proposals to use ANPR to aid tracking of HGV deliveries, but notes this should also apply to vehicles leaving site.
- 4.40 ID34: Acceptable.
- 4.41 ID35: The LHA's concerns remain that the improvements to the A1094/B1069 junction require delivery early in the construction program to avoid disruption

to the applicants' construction vehicles gaining access to the main site compound south of Knodishall.

- 4.42 ID36: The changes to the OCTMP are acceptable.
- 4.43 ID37: The changes to the OCTMP are acceptable.
- 4.44 ID39: The changes to the OCTMP are acceptable.
- 4.45 ID41: 'as required' has been removed. Changes are acceptable.
- 4.46 ID43: The LHA maintains its position that the use of open trenches will require substantial replacement of the road construction to prevent long term settlement of trench backfill.
- 4.47 ID44: The LHA accepts that the proposed methods of managing and auditing of HGVs are acceptable in principle but will be further refined during discharge of the CTMP.
- 4.48 ID46: See ID23.
- 4.49 ID48: The LHA accepts that the notification period for works should align with NRSWA guidance noting that any stopping up or diverting of a street would be considered major works.
- 4.50 ID50: The commitment to an abnormal load access method statement is included within the OAMP.
- 4.51 ID51: The applicant states that access 13 will use be used by NG substation construction vehicles. Can the applicant confirm this is for light vehicles only (<3.5t) and all larger vehicles will access the site via the haul road?
- 4.52 ID55: The applicant states that pedestrians are considered in the OAMP. With regards to Paragraph 56 of the OAMP, which relates to this issue, the LHA considers that a minimum width of footway should ideally be 1.5m with an absolute minimum of 1.0m where this cannot be achieved (as stated in code of practice for streetworks https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321056/safety-at-streetworks.pdf).
- 4.53 ID56: The LHA accepts that the applicant will monitor speeds where temporary speed reductions are in place. However, if vehicle speeds are exceeding the temporary limit the LHA will expect the applicant to implement additional measures to protect the safety of road users.
- 4.54 ID59: How will the operational route through Leiston avoiding turns from the eastbound A1094 to the B1121 be communicated to drivers?

4.55 ID60: Accepted.

S278 agreement (REP8-080)

4.56 No additional comments.

Sizewell Gap Construction Method Statement (REP8-087)

4.57 Paragraph 10: The changes to reflect the LHA as the discharging authority, in consultation with the local planning authority for the Access Management Plan is accepted.

Outline Port Construction Traffic Management and Travel Plan (REP8-092)

4.58 Paragraph 8: SCC considers that as Highway Authority it must be consulted on the transport impacts of a port being selected outside the authority's administrative boundaries rather than the looser 'liaison' proposed by the applicant. This maintains our position stated in our deadline 7 response (REP7-076) paragraph 2.51 and is contrary to the position stated in the applicants deadline 8 response in ID60 (REP8-046).

4.59 At deadline 8 (REP8-175) paragraph 1a in response to ISH13 the authority explained our position with respect to the scope of the Outline Port Construction Traffic Management and Travel Plan (OPCTM&TP):

In REP5-055 para 6.5 SCC responded: "Whilst we note the Applicants' commitment to assessing port traffic once the exact location of the port is known, as noted in our oral submission, we remain concerned that the omission of these impacts does not allow for all parties to understand the total, holistic, impacts of the development. This issue is further exacerbated when trying to understand in combination impacts with other developments (both for NSIPs and applications determined under the Town and Country Planning Act)". SCC also expressed concern that the Port Construction Traffic Management Plan should not exclude any need to consider whether port traffic for the construction of the onshore works should be included within the remit of the Plan. Whilst SCC notes the Applicants' expectation that aggregates in particular will be sourced from within the region, over the duration of the project(s), the potential for marine aggregates to be used (whether for commercial/pricing/continuity of supply or other reasons) cannot be precluded, and SCC would therefore wish to see the remit of PTCMP revised to allow the interaction between port traffic and the onshore works to be addressed as necessary.

This has not yet been addressed by the applicant and reference is still made in paragraph 31 of the OPCTM&PP only to deliveries and not export from the port(s).

Statement of Common Ground with ESC and SCC (REP8-114)

4.60 No additional comments.

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

5.1 Not applicable.