



## **Suffolk County Council (20041323)**

Issue Specific Hearing 1: Post  
Hearing Submission

**Bramford to Twinstead (EN020002)**

Deadline 1

25 September 2023

**Purpose of this Submission**

The purpose of this submission is to provide a written summary of representations made by Suffolk County Council at Issue Specific Hearing 1 (ISH1), on 14 September 2023, in relation to the scope and details of the proposed development, including the draft Development Consent Order.

**Glossary of Acronyms**

<i>(d)DCO</i>	<i>(draft) Development Consent Order</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LHA</i>	<i>Local Highway Authority</i>
<i>PRoW</i>	<i>Public Rights of Way</i>
<i>“The Council” / “SCC” refers to Suffolk County Council; “The Host Authorities” refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.</i>	

<b>Item</b>	<b>Suffolk County Council’s Summary of Oral Case and responses to questions</b>	<b>References</b>
<b>1</b>	<b>Welcome, preliminary matters and introductions</b>	
	Suffolk County Council were represented by the following team in person: <ul style="list-style-type: none"> <li>- Graham Gunby, National Infrastructure Planning Manager, Suffolk County Council</li> <li>- Michael Bedford KC, Barrister, Cornerstone Barristers</li> </ul>	

	<p>Attending colleagues were supported by the following team virtually:</p> <ul style="list-style-type: none"> <li>- Emyr Thomas, Partner and Parliamentary Agent, Sharpe-Pritchard</li> <li>- Callum Etherton, Planning Officer, Suffolk County Council</li> <li>- Steve Merry, NSIP Highway Manager, Suffolk County Council</li> <li>- Julia Cox, Senior Engineer (NSIPs and Projects), Suffolk County Council</li> <li>- Isolde Cutting, Senior Landscape Officer, Suffolk County Council</li> <li>- Claire Dickson, Operations Manager (Rights of Way and Access), Suffolk County Council</li> </ul>	
<b>2 Purpose of the Issue Specific Hearing</b>		
<b>3 The Proposed Development</b>		
<b>3.1 Summary of Scope</b>		
<b>3.2 Relationship with TCPA 1990 consent (22/01147/FUL) for the grid supply point (GSP) substation and associated development</b>		
<b>3.3 Limits of Deviation</b>		
	<p><b>SCC Landscape:</b> <i>Suffolk County Council considers that the Limits of Deviation should be more tightly controlled in key locations, such as around Hintlesham Hall and in the Brett Valley (Benton End). Final pylon positions in key locations should be agreed with Historic England and the relevant local planning authority (Joint Suffolk LIR, Chapter 6 Landscape, paragraphs 6.8 – 6.10 provides more detailed comments).</i></p> <p><b>3.3.a Near Assington</b></p> <p><b>3.3.a.i Work Plans – Sheet 17 [APP-010]</b></p>	

	<p><b>3.3.a.ii Design and Layout Plans Pylon Working Area [APP-029]</b></p> <p><b>3.3.b Stour Valley</b></p> <p><b>3.3.b.i Cable Sealing End Compound (Stour Valley East) Works shown on Work Plans, Sheet 19 [APP-010] and Design and Layout Plans Stour Valley East Cable Sealing End Compound [APP-025].</b></p> <p><b>3.3.b.ii Trenchless Crossings - ES Figures, Figure 4.1, Sheet 20 [PDA-002] and Design and Layout Plans Horizontal Directional Drill [APP-033].</b></p> <p><b>3.3.b.iii Temporary Bridge - ES Figures, Figure 4.1, Sheet 20 [PDA-002] and Design and Layout Plans Temporary Bridge for Access [APP-031].</b></p>	
<p><b>4 Construction Matters</b></p>		
<p><b>4.1 Phasing of the Works</b></p>		
	<p><b>4.1.a Underground works: Cable Working Area Cross Section - Design &amp; Layout Plans Cable Working Cross Section [APP-027]</b></p> <p><b>4.1.b Bramford Substation: ES Figures, Figure 4.1, Sheet 1 [PDA-002]</b></p> <p><b>4.1.c Stour Valley East Cable Sealing End Compound [APP-025] and ES Figures, Figure 4.1, Sheet 19 [PDA-002]</b></p> <p><i><b>SCC PRoW:</b> The information recorded in the Definitive Map and Statement maintained by SCC under the provisions of the Wildlife &amp; Countryside Act 1981 has the following details for the particular rights of way listed below which are close to the Bramford Substation and shown on Sheet 01 of the Access Rights of Way and Public Rights of Navigation Plans [APP-012].</i></p>	

	<p><u><i>Bramford Bridleway No.1 (w155/001/0)</i></u></p> <p><i>Width: 5 metres between OS grid reference TM10064610 (1) and TM09574584.</i></p> <p><i>Other widths as shown by the field boundary lines on OS Second Edition 1904 1:2500 Being 5 metres between the double solid lines between OS grid reference TM10274616 and TM10142611.</i></p> <p><i>Being 2.0 metres between the double pecked lines between OS grid reference TM10142611 and TM10064610.</i></p> <p><i>Varying between a minimum of 2 metres and a maximum of 4 metres between double pecked lines between OS grid reference TM09574584 and TM09354576.</i></p> <p><u><i>Burstall Bridleway No. 9 (w-174/009/0)</i></u></p> <p><i>Width: As shown by the field boundary lines on OS Edition of 1926 1:2500 being 4 metres between the solid and pecked lines between OS grid reference TM09054567 and TM09054568.</i></p> <p><i>Varying between a minimum of 3 metres and a maximum of 4 metres between the double solid lines between OS grid reference TM09054568 and TM09354576.</i></p>	
<p><b>4.2 Main Site Compound at Leavenheath</b></p>		
	<p><b>4.2.a Site selection for the main site compound</b></p> <p><b>SCC LHA:</b> <i>The positive aspects of this site are the proximity to the A134 Sudbury to Colchester Road. However, SCC notes that despite being an A class road, the A134 was not designed to current standards and passes through the communities of Leavenheath and Nayland. SCC considers that visibility splays need to be in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) not Manual for Streets (MfS). SCC would expect to see Road Safety Audits (RSA) undertaken as part of the detailed design. Additional comments on the local highway network will be included in the joint Suffolk</i></p>	

	<p><i>LIR.</i></p> <p><i>SCC is concerned about the lack of detail regarding number and location of temporary construction compounds as this has an influence on the acceptable design of site accesses. SCC has requested details of traffic movements at each access so that it may comment on the design of the access, particularly where compromises to design standards may be desirable, for example to reduce removal of vegetation.</i></p> <p><i>Will each site compound be connected to main services e.g., water or would water need to be tankered in and waste out. If the latter SCC would want confirmation that this has been included in the traffic movements.</i></p> <p><b>SCC Landscape:</b> <i>The lack of information with regards to location, principles of layout and operation and proposals for reinstatement is concerning in landscape terms (Joint Suffolk LIR, Chapter 6 Landscape, paragraphs 6.181)</i></p> <p><b>4.2.b Phasing of the works for the compound, its layout and operation</b></p> <p><b>SCC LHA:</b> <i>The CEMP states that –</i></p> <p><i>“The draft DCO (application document 3.1) states that all pre-commencement operations must be carried out in accordance with the management plans, including the CEMP unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned”.</i></p> <p><i>This is included within requirement 4 –</i></p> <p><i>“The draft DCO (application document 3.1) states that all pre-commencement operations must be carried out in accordance with the management plans, including the CEMP unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned”.</i></p>	
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	<p><i>However, this will require the management plans to be in their final approved form prior to the start of any pre-commencement works.</i></p>	
<p><b>4.3</b></p>	<p><b>Construction Schedule [APP-091]</b></p>	
	<p><b>4.3.a Overview of the construction schedule (2.1 Baseline) and highlight key differences with Illustration 3.1 Alternative Scenario</b></p> <p><i>SCC LHA: SCC would view the GSP as an element which forms an integral part of this project, and its impacts should be included in all assessments (i.e., as illustration 3.1).</i></p> <p><b>4.3.b Construction hours (Construction Environmental Management Plan [APP-177])</b></p> <p><i>SCC LHA: As with paragraph 12.132 of the Joint Suffolk LIR: In transport terms, SCC is not content with the inclusion of Sundays and Bank Holidays as working days with justification that this is essential to delivery of the project ([APP-177] cl 2.3 and dDCO Requirement 7). Such working practices would mean that communities would not have relief from construction traffic for the full duration of the project.</i></p> <p><i>SCC PROW: Similarly, where the project’s construction works impact on the rights of way network (whether by direct disruption or by adjacent working) recreational users should reasonably expect respite on Sundays and Bank Holidays, which are typically popular periods for enjoyment of the network, both by local communities and visitors. This latter point also affects the SCC concerns on tourism impacts. These matters are addressed further in the Joint Suffolk LIR.</i></p> <p><b>4.3.c Construction worker numbers</b></p> <p><i>SCC LHA: SCC would highlight that the peak hour assessment results in only 32 development vehicles on the network in spite of a workforce of 528 due to various discounting by the Applicant (through shift patterns and minibuses), which in the council’s view lacks in controls to ensure that this occurs. SCC notes that, in response to questions asked by the ExA, the Applicant is to provide further information on worker numbers and shift patterns (now part of AP10) and SCC will reserve its further comments until it</i></p>	

	<i>has seen and considered this additional material.</i>	
<b>5 Construction and Operational Access and Traffic</b>		
<b>5.1 Transport Assessment [APP-061], Transport Strategy</b>		
	<p><b>SCC LHA:</b> <i>With the limited time available, SCC was only able to provide a high-level response at this hearing. Whilst accepting the applicant's assessment is intended to consider the reasonable worst case the authority remains concerned that no controls are proposed to keep traffic and worker movements within the values assessed.</i></p> <p><i>The lack of detail and control of changes to the project is concern to SCC. The joint Suffolk LIR to be submitted at Deadline 1 will provide greater detail.</i></p> <p><b>5.1.a Traffic that would be generated by the project</b></p> <p><b>SCC LHA:</b> <i>Whilst some information is available in the TA and ES, SCC have requested more detailed information such as the movements at individual access points and changes in flow over the duration of the project.</i></p> <p><b>5.1.b Draft status of the construction route strategy (Table 4.1 – 'Feedback Received on the Draft CTMP' of [APP-180])</b></p> <p><b>SCC LHA:</b></p> <p><u><i>Construction routes to and from SRN</i></u></p> <p><i>SCC is concerned that the CTMP [APP-180] in 5.4.3 and table 4.1 states that the construction routes remain to be agreed but do not include a mechanism for these changes to be approved by the LHAs. Changes in the size and location of temporary construction compounds can change the volume of traffic using specific accesses and routes. This is a significant concern to SCC since the CTMP is to be a certified document and it does not include any mechanism for further scrutiny or approval of the choices</i></p>	



	<p><i>made by the contractor once appointed. Whilst it is accepted that the nature of the local road network means that there are limited choices that are likely to be available, SCC does not consider that it is satisfactory to leave the choice of routes solely as a matter for the contractor and the Applicant and without oversight and approval by the LHA.</i></p> <p><u><i>Delegation of management plan responsibilities</i></u></p> <p><i>SCC consider that this is still not clear in the documents with duties delegated to contractors (for example 8.2.5 of the CTMP [APP-180] “the contractor will implement a monitoring and reporting system to check compliance with the measures set out within the CTMP. This will include the need for a GPS tracking system to be fitted to HGV owned and operated by the contractor to check for compliance with authorised construction routes. The contractor will also be expected to monitor the number of construction vehicles between the site and the SRN. Deviations from the authorised routes or changes to traffic levels that are higher than the CTMP assumptions will require discussion of the need for additional mitigation measures with the relevant highway authorities” and 1.3.1 of the CEMP [APP-177] “The contractor will be responsible for implementing the measures outlined within the CEMP and associated management plans”.</i></p> <p><u><i>Improvement of existing accesses</i></u></p> <p><i>Improvement may still be required as many are field accesses used by a small infrequent number of agricultural vehicles. Key information such as the volume of use and existing traffic speeds have not been provided to aid the decision-making process.</i></p> <p><u><i>Survey of access route</i></u></p> <p><i>The conclusion that the number of HGVs using the network is not significant is not accepted by SCC, particularly where the roads have a construction that has evolved over time rather than been formally designed. Many of the minor roads are narrow and susceptible to rapid edge erosion by vehicles over-running the edge of the carriageway.</i></p>	
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	<p><u>Vehicle emissions commitments</u></p> <p>SCC welcomes the proposals for this but considers that this should be monitored and if necessary, enforced so that the measures are realised.</p> <p><u>Construction signing</u></p> <p>Usually, the temporary signing would fall within the scope of an access plan or the CTMP rather than the permit system to ensure that it is proactive in respect to changes in the construction phases.</p> <p><u>Workers attending site</u></p> <p>Whilst the applicant considers this is not practical, it has been undertaken by other developers (EA3).</p> <p><u>Monitoring and Enforcement</u></p> <p>SCC still considers that the targets / thresholds, methods of monitoring, reporting and enforcement are not yet satisfactory and do not give the authority confidence that traffic volumes will remain within the limits assessed in the ES and TA.</p>	
<p><b>5.2 Temporary Traffic Regulation Orders, Schedule 12 of the dDCO [APP-034]</b></p>		
	<p><b>SCC LHA:</b> SCC notes that several of the details in the schedules do not agree with the Street Gazetteer or have other inconsistencies. For example, the B1508 is in Suffolk not in Essex.</p> <p><b>5.2.a Risk based approach to proposing traffic orders that would restrict vehicle speeds, prohibit vehicle access, introduce one-way restrictions, prohibit overtaking and restrict vehicle waiting</b></p> <p><b>SCC LHA:</b> Within schedule 12 of the dDCO [APP-034], the applicant has included no waiting restrictions. SCC is concerned about the effectiveness and practicality of these, for example the scale of road marking and signs that may be required. The restrictions do not include any restrictions on loading or unloading</p>	

<p><i>and would require significant lengths of road marking together with the supporting signage to be enforceable. Obstruction of the public highway is an offence in any case. The authority would consider that the applicant may find it more appropriate to consider a more targeted approach to identify locations where there is a risk that on- street parking could cause problems for construction vehicles. It should also be noted that if additional enforcement officers are required these will need to be recruited and trained.</i></p> <p><i>If the applicant expects the local authority and / or Suffolk Constabulary to undertake enforcement of parking restrictions or other regulation orders the authority considers it reasonable to recover any additional costs incurred by the authorities doing so.</i></p> <p><i>SCC sought clarification at ISH1 that the Applicant had engaged with Suffolk Constabulary in the preparation of the proposed restrictions in Schedule 12 and notes that this is now the subject of AP12.</i></p> <p><i>SCC notes some errors in drafting of the regulations in Schedule 12 of the DCO [APP-034] and the Traffic Regulation Order Plans [APP-011], for example:</i></p> <ul style="list-style-type: none"> <li><i>• The B1508 north of Bures is in Suffolk, not Essex;</i></li> <li><i>• A 30mph limit already exists between TRO-AB-17 and TRO-AB-18 on Dukes Street Hintlesham (Sheet 7); and</i></li> <li><i>• The street descriptions differ from those in the National Street Gazetteer (which is the definitive data legal orders).</i></li> </ul> <p><i>A full list will be included in the joint Suffolk LIR.</i></p> <p><b>5.2.b The agencies responsible for civil parking enforcement and enforcing moving traffic offences</b></p> <p><b>SCC LHA:</b> <i>East Suffolk, Ipswich Borough and West Suffolk Councils are responsible for enforcement in their own areas. Enforcement in Babergh and Mid Suffolk are managed by Ipswich Borough and West</i></p>	
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	<p><i>Suffolk Council. The enforcement areas<sup>1</sup> can be seen on Suffolk County Council's parking enforcement areas map (see Appendix 1).</i></p> <p><b>5.2.c Any proposals to make the 30mph speed restrictions self-enforcing</b></p> <p><i><b>SCC LHA:</b> SCC is not aware of any proposals for the applicant, such as traffic calming or enforcement, that have been proposed by the applicant. Nor has speed data been made available to check if speeds at any location are at, or around, those proposed as temporary restrictions. The authority would be concerned if temporary speed limits are used as a control measure to protect road users and workers during temporary works and poor compliance with speed limits negates the effectiveness of this.</i></p> <p><i>While Suffolk Constabulary do undertake enforcement of speed limits, this is subject to availability of their resources and covering other higher priority policing matters.</i></p> <p><i>SCC has a speed limit policy,<sup>2</sup> which outlines the process for the setting of speed limits.</i></p> <p><b>5.2.d Impacts of road closures on emergency services</b></p> <p><i><b>SCC LHA:</b> SCC guidance for road closures states that “access may be allowed to Emergency Services <i>if</i> safe passage permits”.<sup>3</sup></i></p>	
<p><b>5.3</b></p>	<p><b>Temporary and Permanent Measures to Access the Works, Access Rights of Way and Public Rights of Way of Navigation Plans [APP-012]</b></p>	
	<p><b>5.3.a The temporary and permanent measures to access the proposed works</b></p> <p><i><b>SCC LHA:</b> SCC has undertaken a high-level review of the accesses, and this will be submitted as part of</i></p>	

<sup>1</sup> <https://www.suffolk.gov.uk/roads-and-transport/parking/parking-regulations-and-enforcement>

<sup>2</sup> <https://www.suffolk.gov.uk/asset-library/imported/speed-limit-policy.pdf>

<sup>3</sup> <https://www.suffolk.gov.uk/roads-and-transport/roadworks/apply-for-a-temporary-road-closure-or-restriction>

<p><i>the joint Suffolk LIR. It is noted that the plans (Land Plans [APP-011], Works Plans, [APP-010], Traffic Regulation Order Plans and Access Rights of Way and Public Rights of Navigation Plans [APP-012]) are of large scale making it difficult to determine key details such as provision of adequate space for visibility splays. Whilst a generic plan of an access [APP-030] is of some use the Councils' position is that the Applicant must provide sufficient unambiguous information to enable the ExA to judge if the proposals are feasible, safe, and deliverable for the purpose of the examination and for the Councils to assess if they are acceptable within the local highway network. The Councils acknowledge that such information should be proportionate but also that the dDCO grants significant powers to the Applicant.</i></p> <p><i>Whilst SCC notes that requirement 11 will give SCC a measure of control over the detailed design for works to construct or alter new or existing accesses, it is concerned that that control may be limited by the extent of the land included within the Order limits. SCC is aware of the case of <u>Proberun Ltd v Secretary of State for the Environment and Medina Borough Council</u> [1990] 3 PLR 79, which held that, in the context of an outline permission under the Town &amp; Country Planning Act regime, where access was a reserved matter, the local planning authority at the reserved matters stage was not able to refuse to approve an access arrangement that was the best that the applicant could achieve within the 'red line' application site, even though it was unsatisfactory in terms of available visibility. SCC is concerned that a similar argument could be put forward once a Development Consent Order has been made to preclude SCC from refusing to approve under requirement 11 access works it considered were unsatisfactory if they were the best achievable within the Order limits.</i></p> <p><i>To address this concern, SCC considers that the Applicant needs to provide sufficient information at this</i></p>	
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	<p><i>stage to show that where new or improved accesses are required, there is shown to be adequate land available either within the Order limits or within the proven extent of the highway to enable the necessary access improvement works to be carried out in a satisfactory manner. This needs to include consideration of visibility requirements in order to ensure that SCC would not be compelled, in due course, to approve either unsafe accesses or accesses that could only be achieved by the removal of trees, hedgerows, or other vegetation, which may be of landscape, visual, biodiversity, or cultural heritage, value which should be retained.</i></p> <p><i>Experience with other DCOs and planning applications has shown that not considering this matter in sufficient detail can result in significant problems with delivery.</i></p> <p><i>Recent examples have been experienced delivering pre-commencement works for Sizewell C, specifically:</i></p> <ul style="list-style-type: none"> <li><i>• Benhall Fen Meadow entrance where a gap was found between order limits and highway boundary requiring reduction in visibility on the A0194 and bespoke traffic management to allow access.</i></li> <li><i>• King George Avenue where the permitted area of vegetation clearance was insufficient for a visibility splay commensurate with the actual speeds and variation to the plans had to be sought from the LPA once they were convinced there was no significant environmental impact.</i></li> <li><i>• Lovers Lane where an additional access was required as the intended one could not be delivered until contaminated land was cleared and services diverted. The temporary access requires temporary traffic signals on Lovers Lane to operate safely, noting this is the emergency route for Sizewell B.</i></li> </ul>	
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	<p><b>5.3.b The design standards to be applied</b></p> <p><i>SCC LHA: LHA design standards, or where not available NH DMRB standards, should be used for highway works.</i></p>	
<p><b>5.4 Traffic Impacts on Walkers, Cyclists and Horse Riders (WCH)</b></p>		
	<p><b>5.4.a Construction traffic impacts on WCH</b></p> <p><i>SCC PRoW: The details of SCC’s concerns will be within the joint Suffolk LIR but suffice to say that the authority is concerned about the conflict between WCH and construction traffic particularly on local roads with limited or no WCH facilities. Another concern is that PRoW users are not diverted onto the local highway where it is used by construction vehicles.</i></p> <p><b>5.4.b Public rights of way (PRoW) usage surveys (Table 4.2 of Transport Assessment [APP-061])</b></p> <p><i>SCC PRoW: Details of SCC’s concerns are over timings of surveys and adequacy of the number of surveys undertaken. Surveys need to cover peak usage times but it is not clear that the Applicant’s material does this, with no details provided regarding time of day or dates of surveys. Limited to five routes for follow up surveys. SCC notes that the Applicant is to provide further information on its surveys in response to AP16 and AP17.</i></p> <p><b>5.4.c Significance and effects assessment for WCH journey length and severance (Appendix 12.1 Traffic and Transport Significance of Effects Tables [APP-134])</b></p> <p><i>SCC PRoW: SCC will provide a detailed response in the joint Suffolk LIR. The authority has requested a plan showing the links to assist its review.</i></p>	
<p><b>6 Residual Impacts, Mapping and Securing Mitigation Measures, and the Management Plans and Other Control Documents</b></p>		

<p><b>6.1</b></p>	<p><b>Adequacy of the submitted Register of Environmental Actions and Commitments (REAC) for detailed mapping and securing of necessary mitigation measures [APP-179, CEMP Appendix B Register of Environmental Actions and Commitments]</b></p>	
	<p><b>6.1.a The outcome of the environmental impact assessment in terms of significant residual impacts</b></p> <p><b>6.1.b Describe how the mitigation measures to avoid further adverse effects are to be secured and monitored.</b></p> <p><b>SCC Landscape:</b></p> <p><u>Comments on the REAC [APP-179]</u></p> <ul style="list-style-type: none"> <li>- <i>Embedded measures in relation to visual and landscape</i></li> </ul> <p><i>It is not clearly identified which topic area the listed embedded measures relate to. It would be helpful to have an additional column that lists topic areas the measures relate to (as provided for the additional measures).</i></p> <p><i>The REAC provides headlines/ summaries of embedded measures, but little detail, how these will be realised.</i></p> <ul style="list-style-type: none"> <li>- <i>Additional mitigation</i></li> </ul> <p><i>The additional mitigation is not considered sufficient to address the residual landscape and visual effects identified in the ES.</i></p> <p><u>Comments on the LEMP [APP-182]</u></p> <p><i>Not all embedded measures that should be secured through the LEMP are included in the LEMP, for example EM-AB01 (regarding alignment of pylon locations), EM-P08, EM-AB04, (typo in LEMP para 6.7.3 relating to EM-AB09: should surely read 'outside' rather than 'during bird nesting season') EM-C01, EM-D01, EM-E03 (protection of orchard trees): no mention or prescription in LEMP), EM-E05, EM-F01, EM-</i></p>	



	<p><i>G03, EM-G04, EM-G05, EM-G06, EM-H01 (not specified, where this would be secured), EM-H02, EM-H04.</i></p> <p><i>EM-AB10 definition of ‘edge’ should be from outer edge of tree canopies of woodland edge vegetation.</i></p> <p><i>The LEMP includes no further information or prescription regarding the embedded measures than the REAC.</i></p> <p><i>With regards to Additional Mitigation Measures, neither EIA_LV01 and EIA_LV02 (relating to landscape and visual), nor EIA_B01 (relating to biodiversity) are included in the LEMP as per Table 3.1 of Document 7.5.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-179].</i></p> <p><i>EM-D01 requires that planting will be maintained for lifetime of CSE compound. Where is this secured in the LEMP?</i></p> <p><i>SCC noted the Examiners reference to the Yorkshire Green Environmental Statement (ES) Chapter 3 Appendix 3A - Embedded Measures Schedule ([REP6-035]<sup>4</sup> of that application) and would concur that the document is an effective way of summarising the mitigation, delivery mechanism and discharging authority.</i></p>	
<p><b>6.2 Use of ambiguous language in four of the certified documents</b></p>		
	<p><b>6.2.a APP-177 Construction Environmental Management Plan</b></p> <p><b>6.2.b APP-180 Construction Traffic Management Plan</b></p> <p><b>6.2.c APP-181 Materials and Waste Management Plan</b></p> <p><b>6.2.d APP-182 Landscape and Environmental Management Plan</b></p>	

<sup>4</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020024/EN020024-000332-Yorkshire%20Green%20Examination%20Library.pdf>

	<p><b>SCC Landscape:</b> SCC has identified in the joint Suffolk LIR [Chapter 6, Landscape, paras. 6.147-6.181] a series of issues in the LEMP, CEMP and other documents that indicate a lack of clarity, ambiguity and poor definition of terms. As the sole control document stage, the language must be prescriptive to ensure security of the mitigation measures offered. Flexibility can be maintained; however, the Local Authorities must be consulted to ensure that this does not have undue impacts. SCC is of the view, that if these issues could be resolved with National Grid, a Statement of Common Ground could be reached, yet this is currently not considered possible.</p>	
<p><b>7 The Form and Content of the dDCO</b></p> <p>At ISH1 SCC made a number of comments on individual items arising under Agenda Item 7. To avoid repetition, SCC refers the ExA to section 18 of the Joint Suffolk LIR which sets out SCC’s initial comments on key matters in relation to the draft DCO, following the structure of the draft DCO. SCC has not yet completed its review of the detailed wording of all aspects of the draft DCO and intends to provide additional comments as soon as practicable and currently expects to be able to do so at Deadline 2.</p>		
<p><b>7.1 Proposed Development</b></p>		
	<p><b>7.1.a Clarify the scope of the Proposed Development</b></p> <p><b>7.1.b Understanding Schedule 1 of the dDCO [APP-034] and its relationship with the Work Plans [APP-010]</b></p> <p><b>7.1.c Applicant to explain the rationale for including the grid supply point substation to the east of Wickham St Paul within the Proposed Development shown on Work Plans, Sheet 23 [APP-010]</b></p>	
<p><b>7.2 Commencement of Development</b></p>		

<b>7.3</b>	<b>Staging of Development</b>	
	<b>7.3.a Clarity and enforceability of Requirement 3</b>	
<b>7.4</b>	<b>Limits of Deviation</b>	
<b>7.5</b>	<b>Necessity for the Scope of Selected DCO Provisions</b>	
<b>7.6</b>	<b>Subsequent Applications to Relevant Authorities</b>	
	<b>7.6.a Are the provisions reasonable in terms of timescales and the expertise required to determine them?</b>	
<b>7.7</b>	<b>Scope of the Explanatory Memorandum</b>	
<b>7.8</b>	<b>Certified Documents</b>	
<b>8</b>	<b>Any Other Business</b>	
<b>9</b>	<b>Review of Actions Arising</b>	

<b>10</b>	<b>Close of Issue Specific Hearing 1</b>

# Parking enforcement areas - Suffolk

Suffolk County Council Parking Enforcement Areas



Ipswich Borough Council



East Suffolk District Council



West Suffolk District Council

