



Suffolk County Council (20041323)

**Response to Action Points from CAH1, ISH2,
ISH3 and ISH4**

Bramford to Twinstead (EN020002)

Deadline 5

1 December 2023

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Glossary of Acronyms

| | |
|-------------|--|
| <i>DCO</i> | <i>Development Consent Orders</i> |
| <i>EIA</i> | <i>Environmental Impact Assessment</i> |
| <i>ExA</i> | <i>Examining Authority</i> |
| <i>ExQ</i> | <i>Examining Authority’s Written Questions</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>SuDS</i> | <i>Sustainable Drainage Systems</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.

Purpose of this Submission

The purpose of this submission is to provide further information requested by the Examining Authority under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010. In this instance, to provide further substantial responses to action points **[EV-045]** at the second round of hearings (CAH1, ISH2, ISH3 and ISH4). Examination Library references are used throughout to assist readers.

1 Response to Action Points from Issue Specific Hearing 2

- 1.1 SCC responded to AP3 at Deadline 4 in its post-hearing submission for ISH2 [REP4-043].

AP4 (Suffolk County Council) To provide a detailed review in due course (Deadline 4 or Deadline 5) of problems perceived with the control documents/ management plans.

- 1.2 SCC (LHA), SCC (Archaeology), and SCC (Landscape) have provided substantive responses to this action point as noted in SCC's Responses to comments on the Suffolk Joint Local Impact Report [REP4-008] in SCC's Post Hearing Submissions following ISH3 [REP4-021], in SCC's Comments on other submissions at Deadline 3 [REP4-046] and in SCC's Post Hearing Submissions following ISH2 [REP4-043]. As indicated at section 5.8 of SCC's Post Hearing Submissions following ISH4 [REP4-039] SCC (Landscape) has also provided at Deadline 5 a tracked changes version of the current LEMP [REP3-034] as submitted by the Applicant at Deadline 3, which shows SCC's suggested changes to the LEMP in order to make it function as an outline LEMP (oLEMP). These comments apply to the CTMP, the CEMP, the LEMP and its appendices, the PRowMP, and the OWSI.
- 1.3 SCC has no other comments to make on this Action Point.

2 Response to Action Points from Issue Specific Hearing 3

2.1 SCC responded to AP1 in its post-hearing submission for ISH3 **[REP4-021]**.

AP3 (Suffolk County Council and Essex County Council) Provide a prioritised list of the key missing assumptions and inputs that are perceived to be missing from the transport assessment.

Abnormal Indivisible Loads (AILs)

2.2 A summary of the types of AILs, origin and destination would assist the LHA in making comments on the suitability of routes. For the most onerous sizes of load (i.e., both in terms of weight and dimension), a feasible route should be proved by survey. SCC (LHA) is concerned that the applicant has not undertaken sufficient studies to show that there are currently no weak structures or highway constraints, such as oversailing at bends and junctions that may prejudice access. SCC has requested the preparation of a Detailed AIL Management Plan in its submissions at Deadline 4 **[REP4-021]**.

2.3 The access routes for AILs through Sudbury are open to further discussion as the route via Shawlands Avenue may be more appropriate for some movements to avoid the centre of Sudbury and the one-way system.

Heavy Goods Vehicles (HGVs)

2.4 Concerns remain regarding a number of routes. These concerns were documented in the Annex E of the LIR **[REP1-044]**. Whilst a summary of vehicle movements was provided by the Applicant to the examination at D4 **[REP4-006]**, SCC (LHA) has yet to receive the requested information in spreadsheet format to allow interrogation of the numbers, particularly in terms of the use of specific routes and validate the data included in the Transport Assessment figures **[APP-061]**. The information does not provide support for the assumption that HGV movements are equally spaced throughout the working day.

2.5 The most serious omission in terms of transport data is, in SCC (LHA)'s view, the lack of sufficient detail to ensure that the proposed accesses are feasible and that all impacts associated with their construction have been identified and quantified. SCC (LHA) has requested, and understands that the Applicant has agreed to provide, this information. Specifically, this should include scale plans, namely:

- Order limits;
- Highway boundary;

- Visibility splays (supported by speed surveys where these depart from DMRB guidance);
- Bellmouth layout and any other widening or alteration of the highway;
- Swept path for most onerous sized vehicles expected to use the access;
- Details of vegetation and what is to be removed, coppiced or cut back; and
- Validated the width and layout of the existing carriageway adjacent to the access (noting that the OS maps are not of sufficient accuracy).

2.6 Whilst Requirement 11 provides the LHA with the ability to refuse to approve access, SCC is concerned that in practice this will prevent or delay delivery of a Nationally Significant Infrastructure Project. The implications of this could place the authority in a difficult position and may result in pressure being applied to the authority to accept a sub-standard layout, thereby increasing risks to the highway users. In SCC (LHA)'s view, the provision of proportionate information at this stage can minimise these risks.

Workers

2.7 Much of the information provided by the Applicant regarding workers is not evidenced. Therefore, it is difficult for SCC (LHA) to comment on whether the information forms a reasonable estimation of the impacts relating to workers. It would be helpful to have supporting evidence, including:

- Details of how worker numbers have been calculated;
- Shift patterns stated and consistent across all seasons; and
- Proportion of crew busses and occupancy.

Road and PROW Closures

2.8 Whilst details of individual closures have been provided, a holistic programme showing the combined impact at any stage of the project has not. SCC (LHA) is concerned that if multiple PROW are closed at any moment, this would be unacceptable in terms of impact on the users, for example, significantly lengthy diversions, repeated closures or loss of amenity value will discourage users. Similarly, the closure of roads if uncoordinated could create significant disruption and unacceptable length of diversions.

Traffic Data

2.9 SCC (LHA) has requested the applicant provide:

- Speed limit surveys;

- Traffic (classification) surveys;
- Junction assessments; and
- Plan showing location and limits of links assessed in the ES.

Summary: Missing Information and Assumptions

| Evidence Required | | | | |
|---|-----------------------------|----------------------------|----------------------|---|
| AILs | | | | |
| Evidence | | LIR Ref | LIR Annex D | Comments |
| Assumed number of AILs and category (ie STGO1-3 / Special Order) | Project specific | CTMP 5.2.1 | | |
| Route analysis | Project specific | 12.95 | Table D1 | |
| Highway structure review | Project specific | 12.82, 12.98 | Table D1, D.140 | |
| HGVs | | | | |
| Evidence | | LIR Ref | LIR Annex D | Comments |
| Access Routes | Project specific | 12.84 | Table D1 | Provided at D3. Still some clarity required regarding routing through Sudbury and Great Cornard |
| How numbers have been calculated based on construction activities / materials | Project specific | 12.43, 12.56, 12.59 | | Monthly profile provided at D4 but no supporting evidence on how calculated. |
| Access layout drawings inc swept path into bellmouth, highway boundary, order limits, visibility, vegetation. | Location specific | 12.4 | D.149 | |
| Distribution profile across day | Historical - other projects | 12.43 | Table D.1 | |
| Workers | | | | |
| Evidence | | LIR Ref | LIR Annex D | Comments |
| How totals of workers has been estimated | Historical - other projects | 12.43, 12.56, 12.59, 2.63b | D.70, D.73, Table D1 | |
| Proportion of cars to crew buses | Historical - other projects | 12.43, 12.52 | | |
| Arrival / departure compared to shift patterns | Historical - other projects | 12.43, 12.52 | D.74 | |
| Other | | | | |
| Evidence | | LIR Ref | LIR Annex D | Comments |
| Duration of road closures and sequence | Project specific | | Table D.1, D.169 | |
| Duration of Prow and sequence | Project specific | | Table D.1 | |
| Traffic Data / Surveys | | 12.55, 12.63a | D.81 | |

AP5 (Suffolk County Council and Essex County Council) Identify the base parameters that are critical for the CTMP.

AILs

2.10 The movement of AILs is generally controlled through separate consenting processes, such as Electronic Service Delivery for Abnormal Loads. However, issues with the capacity of Suffolk's bridge stock make it, in SCC (LHA)'s view, imperative that a feasible route is determined, at this stage, to ensure that access for AILs is at least feasible as issues such as weak bridges and highway constraints identified. The Applicant has proposed control via the specification of routes within the CTMP, which is acceptable subject to the above.

HGVs

2.11 Timing: SCC (LHA) would consider that to give respite to local communities, HGV movements should be restricted to:

- Monday to Friday 0600-2000.
- Saturday 0600-1400.

2.12 With exceptions as listed in the which if accepted by the decision makers should give the Applicant the flexibility that they require to deliver the project.

2.13 HGV Access Routes: SCC (LHA) has raised concerns regarding the suitability of some of the HGV access routes in the LIR [REP1-044]. The information provided by the Applicant at D4 assists the authority in understanding the movements, but our position remains that controls are necessary to ensure that movements do not exceed those assessed in the TA and ES. Our view is that this is consistent with EN1 2023:

5.14.14 The Secretary of State may attach requirements to a consent there is likely to be substantial HGV traffic that:

- *control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements*
- *make sufficient where provision for HGV parking, 271 and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid ‘overspill’ parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions*
- *ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force*

Recovery of expenses due to by extraordinary traffic (Highways Act 1989 s59)

2.14 SCC (LHA) considers it proportionate to include an agreement to recover any costs incurred due to damage resulting from traffic associated with this development and this should be recovered through a side agreement or protective provisions. This formalises the arrangement without recourse to a retrospective application through the courts.

Emissions

2.15 SCC (LHA) considers that emissions from HGVs should be controlled to minimise pollution from construction traffic. This can be achieved by a commitment in the CTMP for all HGVs to be compliant with EURO IV, although accepting that some specialist vehicles may need to be exempt.

Workers

2.16 SCC (LHA) considers that trips resulting from workers employed on this project

should be controlled to ensure that trips do not exceed those assessed in the ES or TA. This can be through the monitoring and reporting of vehicles arriving and departing the site(s) or recording numbers of workers and the transport modal split to achieve the same.

Works Access

2.17 Requirement 11 states that all accesses need to be approved by the LHA this does not include any other works on the highway. Nor does SCC (LHA) consider that sufficient information has been provided to assure the authority that the proposed temporary and permanent accesses are feasible and that all impacts have been assessed. Other similar projects have had specific Access Management Plans to focus on this element.

Monitoring and Reporting

2.18 Controls must be supported with sufficient monitoring and reporting to demonstrate compliance with controls. Summaries of the reports should be made public subject to appropriate data protection being applied.

Summary: Controls and Monitoring

| AIL | | | | |
|--|---|--|--------------------------------------|-----------------------|
| Control | Reason | Parameter | Monitoring | LIR Ref |
| General comments on need for controls | | | | |
| Feasible route to be provided by the applicant from potential port of origin to site destination for most onerous reasonable load to test geometry of highway. | To ensure viable AIL route and identify network constraints | Feasibility study submitted to PINs for LHA comment | | 12.4, 12.9, 12.51 |
| Highway structures need to be reviewed to ensure that there are no limits that may prevent access. | | Review | Agreement with LHA | 12.82 |
| HGVs | | | | |
| Control | Reason | Parameter | Monitoring | LIR Ref |
| Construction routes to be agreed | To avoid use of unsuitable routes | Plans | GPS / DMS | 12.74 |
| Daily HGV numbers to be limited on main haul roads (A134, A1071) | To ensure values assessed in ES and TA and hence impact not exceeded | Max daily trips | GPS / DMS | 12.63d |
| Timing restrictions for HGV movements (with exceptions) | Reduce impact on local communities | Mon-Fri 0600-2000. Sat 0600-1400. With exceptions as listed in CTMP | Arrival / departure times on site | 12.131, 12.132 |
| Extraordinary damage | To avoid future dispute. | Agreement of methodology | Surveys (CVI / Deflectograph) | 12.103 |
| Emissions | Reduce pollution | Proportion compliant with EURO VI | Recording of vehicle emission class | |
| Workers | | | | |
| Control | Reason | Parameter | Monitoring | LIR Ref |
| Vehicle movements (arrivals and departures to be monitored at main site compounds) | To ensure values assessed in ES and TA and hence impact not exceeded, specifically that shift patterns avoid travel in network peak | Maximum hourly number of worker trips at site compound - or worker numbers recorded together with mode of transport. | ATC or worker numbers and mode split | 12.57, 12.63e, 12.63f |
| Works Accesses | | | | |
| Control | Reason | Parameter | Monitoring | LIR Ref |
| That safe temporary access points can be provided without excessive engineering works or removal of vegetation | Protect safety of road users. Minimise environmental impact | Requirement - note that this is insufficient in isolation. Suggest AMP | | 12.99 |
| That safe permanent access points can be provided without excessive engineering works or removal of vegetation | | Requirement and highway agreement. Note different from temp accesses as must be designed for permanent use. | | 12.102 |

3 Response to Action Points from Issue Specific Hearing 4

3.1 SCC responded to AP9 in its post-hearing submission for ISH4 **[REP4-039]**.

AP6 (Babergh District Council and Suffolk County Council) Provide a note on the nature and scope of any additional assessment you consider necessary to account for the long, cultural association of assets and landscapes with famous artists and writers.

3.2 SCC (Planning) notes that Babergh District Council provided a response to this action point in Appendix A (Benton End – brief history and ambition for the future) of Babergh District Council and Mid Suffolk District Council’s joint Deadline 4 submission **[REP4-051]**. SCC (Planning) supports the information provided from Babergh District Council at Deadline 4.

3.3 SCC (Planning) understands that Babergh District Council will provide a submission at Appendix A of their Deadline 5 submission, a summary of material produced representing Benton End and the surrounding landscape – which SCC supports. The Councils believe these paintings reinforce that the wider landscape setting aided the unique situation at Benton End in the early 20th century and its significance as a place of artistic activity/history.

3.4 On this basis, SCC and Babergh District Council consider it necessary for the applicant to provide further heritage impact assessment, by way of an appendix or addendum to the EIA heritage chapter, which demonstrates that the significance of the asset has been re-assessed, having regard to the cultural significance of the wealth of material produced by noted artists. The original impact assessment should then be superseded and/or updated as appropriate.

3.5 SCC and Babergh District Council consider that the Applicant should ensure that the setting of the asset should be protected, as a minimum, via micro-siting of towers, at least to the same level of control as for Hintlesham Hall.