



Suffolk County Council (20041323)

Post-Hearing Submission for the Fifth Issue Specific Hearing (ISH5) on the draft Development Consent Order and Related Matters

Bramford to Twinstead (EN020002)

Deadline 6

20 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 Highways 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 a written summary of representations made by Suffolk County Council at the Fifth Issue Specific Hearing (ISH5), on 13 December 2023, into the draft Development Consent Order and related matters. Examination Library references are used throughout to assist readers.

Item	Suffolk County Council’s Summary of Oral Case and responses to questions	References
1	Welcome, preliminary matters and introductions	
	<p>Suffolk County Council were represented by the following team virtually:</p> <ul style="list-style-type: none"> - Graham Gunby, National Infrastructure Planning Manager, Suffolk County Council - Michael Bedford KC, Barrister, Cornerstone Barristers - Emyr Thomas, Partner and Parliamentary Agent, Sharpe Pritchard - Steve Merry, Transport Policy and Development Manager, Suffolk County Council - Julia Cox, Senior Engineer (NSIPs and Projects), Suffolk County Council - Claire Dickson, Operations Manager (Rights of Way and Access), Suffolk County Council - Isolde Cutting, Senior Landscape Officer, Suffolk County Council - Callum Etherton, Project Officer (Energy Infrastructure), Suffolk County Council 	
2	Purpose of the Issue Specific Hearing	
3	Review of Applicant’s Schedule of Changes to the dDCO	
	<p>SCC responded to the Schedule of Changes to the draft DCO at Deadline 4 in its D5 document “<i>Comments on any other submissions received at Deadline 4</i>”, dated 1 December 2023 [REP5-033].</p> <p>In respect of the Schedule of Changes to the draft DCO at Deadline 5 [REP5-020], SCC comments are included in <i>SCC’s comments on any other submissions received at Deadline 5</i> to be submitted at Deadline 6 (20 December 2023).</p>	

4 Review of the Parties’ Current Positions on Requirement 7 – Construction Hours	
4.1. Consideration of Applicant’s response to Action Point 1 arising from ISH2 [EV-045] - explanation of assumptions when undertaking the EIA in relation to construction working hours and alternate working weekends.	
	<p>The Applicant’s response to Action Point 1 from ISH2 is included in its Deadline 4 submission Applicant’s Response to the November Hearings Action Points [REP4-042]. The Applicant’s Response is –</p> <p>“As stated in paragraph 4.4.19 of Environmental Statement (ES) Chapter 4: Project Description [APP-072], the environmental assessment assumed the following core working hours for construction that are set out within Requirement 7 of the draft DCO (document 3.1 (D)):</p> <ul style="list-style-type: none"> • 07:00–19:00 Mondays to Fridays; and • 08:00–17:00 on Saturdays, Sundays and Bank Holidays. <p>As set out in paragraph 2.3.2 of the CEMP [REP3-024], a period of one hour may be used either side of the core construction working hours at the start and end of each day to include activities such as job start meetings, toolbox talks, safety briefings, training, refuelling plant and equipment, setting up of material and equipment, installation of traffic management systems, and general housekeeping measures. These start-up and shut-down activities will not involve the operation of construction plant and equipment to limit the amount of noise and light emissions and therefore were not assessed in the ES, as these activities would have limited environmental effects.</p> <p>As described in paragraphs 4.2.22 to 4.2.25 of ES Chapter 4: Project Description [APP-072], there may be occasions where night working is required. In terms of the assessment presented in the ES it was assumed that this would typically only occur on rare occasions and would be likely to last for only a short duration, therefore was typically not assessed. The exception is for the noise assessment at the proposed trenchless crossings, where night-time working may be required to complete activities that once started, would need to continue and this was considered to potentially lead to significant effects as assessed in ES Chapter 14: Noise and Vibration [APP-082].</p> <p>The ES did not assume alternate weekend working, it assumed that works could take place on any Saturday</p>

	<p>or Sunday”.</p> <p>The position is articulated differently in the Applicant’s <i>Justification for Construction Working Hours</i> [REP3-045] which states that for the purposes of the Baseline scenario works have been scheduled “only on alternating Saturdays and Sundays” with consecutive weekend working only taking place “in order to recover delays” (paragraph 2.1.3). The Applicant’s <i>Construction Schedules with Critical Path</i> [REP5-027] confirms the position and states: “Under the Baseline Construction Schedule, works are primarily scheduled to be undertaken only on alternating weekends and whilst works may have to occur on consecutive weekends, ordinarily this would be in order to recover delays. Delays may occur for a number of reasons during the works, for example due to encountering unexpected ground conditions, supply chain issues, low productivity, or any restrictions resulting from future unforeseen events (e.g., global pandemic)” (paragraph 1.2.3”).</p> <p>SCC (Legal) considers either Requirement 7 (construction hours) should be amended to reflect the reality of the Applicant’s proposed way of working or the control documents should be finessed to do so. SCC remains unpersuaded that the Applicant needs the flexibility to work on successive weekends (including successive Sundays) when its construction schedule can be achieved, on the Applicant’s own documents, by working on alternate weekends.</p> <p>In addition, SCC (Planning) questions why the proposed reasonable worst case scenario modelling of the construction operations, as assessed in the EIA, cannot provide a reasonable ceiling on the proposed operations, for example in relation to maximum lorry movements. SCC would welcome the Applicant’s response to this point.</p>	
<p>4.2. Review of the Applicant’s response to Action Point 2 arising from ISH2 – the relationship of baseline construction schedule and critical path analysis and associated implications for the draft DCO. (See its Deadline 5 submission Construction Schedules with Critical Path (Applicant’s document reference 8.7.5).)</p>		
	<p>This document has been given reference [REP5-027]. It includes a schedule for the Baseline Construction Schedule and two scenarios which involve reducing core working hours. An effect of implementing either scenario would be: “the first outage in the required sequence of outages, to be missed for Scenario 1 by seven weeks and for Scenario 2 by seven months. This would result in the subsequent sequence of outages to be missed and result in the 2028 delivery date not being met”.</p> <p>Even accepting that the outage is a fixed point, SCC has not seen any information to show that the Applicant could</p>	

	<p>not complete its programme without HGVs making deliveries on Saturday afternoons, Sundays, and Bank Holidays. SCC considers that with appropriate logistics advance planning there is no reason why deliveries to the various works sites cannot take place on Mondays to Fridays (and potentially Saturday mornings), with materials being stockpiled to the extent necessary to ensure that sufficient materials remain available at the works sites for any works that are required to be undertaken on Saturday afternoons, Sundays, and Bank Holidays, and those materials then being replenished as required on the next weekday.</p> <p>SCC (Planning) accepts that the Applicant’s schedule sets out a timetable for the construction of the proposed development by 2028. As it stands, however, there would appear to be little respite for local communities along the routes likely to be used by HGVs from the proposed 7 days per week construction programme. This is unacceptable and, at the very least, there should be no deliveries by lorries to site on Saturday afternoons, Sundays and on Bank Holidays. SCC would therefore suggest that the draft DCO is amended [REP5-006] to reflect this. For instance, existing paragraph (2) of Requirement 7 (construction hours) could be amended as shown in bold and underlined below –</p> <p>“(2) No percussive piling operations may take place on Sundays and Bank Holidays <u>and no lorry deliveries may be made to site on Saturday afternoons, Sundays and Bank Holidays</u>”.</p>	
<p>4.3. Clarification of whether draft Requirement 7 - construction hours - would apply to ‘pre-commencement’ operations defined in Article 2(1) and consideration of whether any associated amendment is needed.</p>		
	<p>Requirement 7(1) states “Subject to sub-paragraphs (2) and (3), work may only take place ...”</p> <p>There is no definition of “work” in either article 2 (interpretation) or paragraph 1 (interpretation) of Schedule 3 and it would seem arguable that the term is broad enough to cover “pre-commencement operations”. SCC welcomes the Applicant’s confirmation that it intends Requirement 7 to regulate all pre-commencement operations. It would clearly be in everyone’s interests (particularly for, say, residents interested in the application who have not been following all of the issues raised during the Examination) for the position to be clear and so a “for the avoidance of doubt” provision could be drafted to cover the point. For instance, Requirement 7(1) could be amended as shown in bold and underlined below -</p> <p>“Subject to sub-paragraphs (2) to (4), work <u>(which includes any pre-commencement operation)</u> may only take</p>	

<p>place ...”</p> <p><u>Severe weather conditions</u></p> <p>During ISH5, there was a discussion about the words “severe weather conditions” in Requirement 7(3)(g). That provision allows works delayed or held up by “severe weather conditions” to be completed outside the core working hours referred to in Requirement 7(1). While SCC accepts the fact that certain abnormal weather events might disrupt the undertaker’s plans, SCC also considers it would be helpful if that term was defined and would propose the inclusion of the following sub-paragraph after existing Requirement 7(4) –</p> <p>“In this Requirement, “severe weather conditions” means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices”.</p> <p>SCC further considers it would be helpful if the undertaker notified the relevant planning authority to explain when and why works could not be done at the appropriate time. SCC would propose the inclusion of the following sub-paragraph after existing Requirement 7(3) –</p> <p>“Where any work has been delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities in accordance with sub-paragraph (3)(g) the undertaker must, as soon as practicable, notify the local planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1)”.</p> <p>Taking together the amendments set out in items 4.2 and 4.3, SCC would propose Requirement 7 is amended as follows (amendments shown underlined and bold) –</p> <p>“7.—(1) Subject to sub-paragraphs (2) to (4), work <u>(which includes any pre-commencement operation)</u> may only take place between 0700 and 1900 Monday to Friday and between 0800 and 1700 on Saturdays, Sundays and Bank Holidays (the core working hours), unless otherwise approved by the relevant planning authority.</p> <p>(2) No percussive piling operations may take place on Sundays and Bank Holidays <u>and no lorry deliveries may be made to site on Saturday afternoons, Sundays and Bank Holidays.</u></p> <p>(3) The following operations may take place outside the core working hours referred to in subparagraph (1)—</p> <p>(a) trenchless crossing operations including beneath highways, railway lines, woodlands or watercourses;</p>	
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	<p>(b) the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses;</p> <p>(c) the jointing of underground cables (save for the cutting of underground cables);</p> <p>(d) the completion of operations commenced during the core working hours which cannot safely be stopped;</p> <p>(e) any highway works requested by the highway authority to be undertaken on a Saturday, Sunday or a Bank Holiday or outside the core working hours;</p> <p>(f) the testing or commissioning of any electrical plant installed as part of the authorised development;</p> <p>(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;</p> <p>(h) activity necessary in the instance of an emergency where there is a risk to persons or property;</p> <p>(i) security monitoring; and</p> <p>(j) surveys.</p> <p><u>(3A) Where any work has been delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities in accordance with sub-paragraph (3)(g) the undertaker must, as soon as practicable, notify the local planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1).</u></p> <p>(4) The core working hours referred to in sub-paragraph (1) exclude start up and close down activities up to 1 hour either side of the core working hours.</p> <p><u>(5) In this Requirement, “severe weather conditions” means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices.”</u></p>	
<p>4.4. Any other associated issues arising from Deadline 5 submissions including the implications of concerns about</p>		

Requirement 7 – Construction hours of the draft DCO [REP4-030] for Article 46 – Defence to proceedings in respect of statutory nuisance.	
	SCC (Legal) notes this item was directed at Mid Suffolk District Council and will await Mid Suffolk’s analysis of the relationship between Requirement 7 and Article 46 before commenting on this point.
5 Implications for the Councils of draft Article 53 – Safeguarding	
5.1. Review of Suffolk County Council’s and Braintree District Council’s submissions arising from Action Point 3 from ISH2 [EV-045], due at Deadline 5.	
	<p>SCC responded to Action Point 3 at Deadline 4 in its post-hearing submission for ISH2 [REP4-043], stating –</p> <p>“SCC maintains concerns in principle about this article. It is preceded in Thames Tideway, which is completely different in nature and location. Thames Tideway is an urban scheme which involves tunnelling, and it is therefore more understandable that some provision should have been made, particularly (as SCC understands it) there was opposition to the scheme in principle by some of the local planning authorities.</p> <p>SCC has also raised a concern about the detailed drafting and the imposition of a requirement on the local planning authority to “address” matters raised in any representations by the undertaker in relation to planning applications. This was not included in Thames Tideway. SCC considers that this term interferes with the ‘normal’ operation of section 70(2) of the Town & Country Planning Act 1990 (which requires a LPA to ‘have regard to’ material considerations but does not dictate the outcome of that process), and is an unjustified interference with the discretion that Parliament has entrusted to local planning authorities. In this regard, SCC also notes that Article 53 is not time limited and would therefore endure for as long as the authorised development (or any part of it) remains in place.</p> <p>In terms of the additional administrative burden, then this would most likely fall on the district council rather than SCC. It will place an additional amount of work on the planning authority to give notice to the Applicant of relevant planning applications and then take account of and “address” matters raised by the undertaker. It is not clear on whom the burden falls of registering the requirement to consult as a land charge, presumably on every property within the safeguarding zone but SCC does not believe it should be the responsibility of a</p>

	<p>local authority. If the article is allowed to remain, then any additional costs of implementing it must be covered by the Applicant, potentially through a planning performance agreement”.</p>	
<p>6 Perceived problems with control documents/ management plans</p>		
<p>6.1. Review of Suffolk County Council’s Deadline 5 submission arising from Action Point 4 from ISH2 [EV-045].</p>		
	<p>SCC’s Deadline 5 <i>Response to Action Points to CAH1, ISH2, ISH3 and ISH4 [REP5-034]</i> submission stated –</p> <p>“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”.</p> <p>In addition, SCC (Landscape) provides further evidence on the shortfall of the LEMP and associated documents in SCC D6 Submission Additional Evidence Relating to the Landscape and Ecological Management Plan.</p> <p>SCC (LHA) proposed controls on:</p> <ul style="list-style-type: none"> • HGVs: Number, routes, timing; • Emissions: Monitoring of HGVs; and • Workers: number of vehicles, compliance with assumed shift pattern. <p>This was supported by suitable monitoring and reporting of data, as shown below.</p>	

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
7 Temporary construction compounds				
7.1. Does the approximate area in Table 4.1 of the Construction Environmental Management Plan [REP3-024] equate to the zone shown for temporary construction compounds on the General Arrangement plans [APP-018]?				
	SCC (Legal) will await the Applicant's comments on this point and any further comments the ExA has.			
7.2. Are the local authorities satisfied that there is sufficient control over the siting of the proposed temporary construction				

<p>compounds?</p>	
	<p>Work No. 12 (temporary site compounds) is concerned with the establishment of temporary site compounds and while Works Nos. 1 to 11 each cross-refer to works shown on sheets of the Work Plans, there is no cross-reference to the Work Plans in the description of Work No. 12. The introductory text to Work No. 12 states –</p> <p style="padding-left: 40px;">“Works to construct temporary site compounds as part of the authorised development and in each case which may include [certain things]”.</p> <p>So, a temporary site compound could form part of any of the eleven other numbered Works; however, it is not clear where any such compound would be sited. It is acknowledged that the General Arrangement plans show the location of temporary compounds; however, the General Arrangement plans are not linked to any requirement or (as far as we can tell) a control document.</p> <p>SCC (Legal) notes that the definition of “pre-commencement operations” includes “set up works associated with the establishment of construction compounds” (article 2(1)).</p> <p>By Requirement 4(3) of the dDCO [REP5-006] “all pre-commencement operations must be carried out in accordance with the plans listed in sub-paragraph (2) unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned, and in the case of the Construction Traffic Management Plan, the relevant highway authority”.</p> <p>The plans listed in sub-paragraph (2) are the Construction Environmental Management Plan (CEMP); Materials and Waste Management Plan (MWMP); Construction Traffic Management Plan (CTMP); Landscape and Ecological Management Plan (LEMP); and Public Rights of Way Management Plan (PRoWMP).</p> <p>Neither the CTMP [REP3-031] nor the LEMP [REP3-035] refer to construction compounds.</p> <p>Paragraph 4.12 of the PRoWMP [REP3-056] states –</p> <p style="padding-left: 40px;">“The PRoWMP considers the following due to the construction of the project ... PRoW and ORPA [Other Routes with Public Access] which are affected by the routing of temporary construction compounds”.</p> <p>While it is not clear to us the PRoWMP does this, the PRoWMP does not refer to the siting of temporary</p>

	<p>construction compounds.</p> <p>Similarly, while the CEMP [REP4-018]ⁱ and MWMP [REP3-033]ⁱⁱ refer to construction compounds, they do not refer to the siting of temporary construction compounds, though commitment W07 of the CEMP states: “... All construction compounds will be located in Flood Zone 1. Where this is not practicable, additional measures will be identified within a flood risk action plan”.</p> <p>SCC (Planning) considers that the siting of temporary construction compounds should be fixed so that their implications can be properly considered.</p>	
<p>7.3. Any other associated issues arising from Deadline 5 submissions</p>		
<p>8 Article 2 – ‘pre-commencement operations’ – Review of:</p>		
<p>8.1. Essex County Council’s and Braintree District Council’s comments in their Response to Applicant’s Comments on their Local Impact Report AGENDA FOR BRAMFORD TO TWINSTEAD REINFORCEMENT ISH5 PAGE 3 OF 7 and Other Documents [REP4-049] at sub-section 16, including the adequacy of the Explanatory Memorandum in this respect [REP4-045].</p>		
	<p>This is a matter for Essex County Council and Braintree District Council.</p>	
<p>8.2. Applicant’s response at Deadline 5</p>		
	<p>This is a matter for the Applicant.</p>	
<p>9 Local authorities’ suggested amendments to the draft DCO – Consideration of:</p>		
<p>9.1. Amended wording of existing Articles, Requirements and Schedules suggested by the Suffolk councils in response to</p>		

ExQ1 questions DC1.6.85, DC1.6.93, DC1.6.105 and DC1.6.119 [PD-005]		
	While this item was not discussed at ISH5, SCC would propose to provide its comment on it at a future deadline.	
9.2. The need for, and wording of new Requirements put forward by the Essex councils in response to ExQ1 question DC1.6.97 [PD-005]		
	The proposed new requirements are included at Appendix 3 to Essex CC’s and Braintree DC’s <i>Deadline 3 Response – ExA Questions 1 [REP3-061]</i> . Subject to drafting points, SCC is content with these in principle.	
9.3. Any other associated issues arising from relevant Deadline 4 and 5 submissions		
10 Any Other Business		
11 Review of Actions Arising		
	<p>11.1. AP5 (Suffolk County Council) By Deadline 7, provide a review of the Applicant’s changes to Schedules 5, 6, 7, 8 and 12 of the draft DCO in response to your highlighted inaccuracies in relation to the national street gazetteer.</p> <p>SCC will endeavour to submit the requested information by Deadline 7.</p>	
12 Close of Issue Specific Hearing 5		

i The CEMP includes the following provisions –

GG10 – “Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, will be located away from sensitive receptors such as residential properties or designated ecological sites where practicable”.

GG16 – “Wash down of vehicles and equipment will take place in designated washdown areas within construction compounds and will be contained. Wash water will be prevented from passing untreated into watercourses and groundwater. Washdown water containing detergent must not pass through an interceptor. Appropriate measures will include use of sediment traps”.

W07 – “... All construction compounds will be located in Flood Zone 1. Where this is not practicable, additional measures will be identified within a flood risk action plan”.

W13 – “Wastewater generated from construction compound welfare facilities will be discharged to sewer, subject to the agreements with the utility providers, or in locations where a sewer connection is not reasonably practicable, collected and tankered off site for disposal at a licensed treatment facility”.

SMS [Strip Map and Sample] will be applied in areas of the project where the ATT [Archaeological Trial Trenching] and other field surveys have located the presence of archaeological remains warranting preservation by record and the project is anticipated to require topsoil removal. Areas currently identified for SMS are shown on Figure 1: Proposed Archaeological Mitigation and include:

- Section F: Leavenheath/Assington, immediately to the north of Leavenheath village in the location of the proposed construction compound where potentially prehistoric remains were identified during ATT, including a cremation burial; and

Section G: Stour Valley, to the east of St Edmund’s Hill, where kiln remains were found during ATT.

ii The MWMP includes the following provisions –

5.3.3 – “Construction compounds will be provided with good practice measures for water conservation, for example the use of water-efficient taps within welfare facilities, waterless toilet facilities, assessment of whether water can be reused, and regular checks to hoses for water leaks. Further details on water use and consumption can be found in Chapter 9: Water Environment of the CEMP”.

Paragraph 6.5.1 – During construction, various waste will be created during the works. This is likely to include the following sources (which will be stored separately to avoid cross contamination) along with the likely waste management methods:

Wastewater: Wastewater including potable and site toilet waste generated from the construction compound welfare facilities will be discharged to sewer, subject to the agreements with the utility providers. In locations where a sewer connection is not reasonably practicable, wastewater will be collected and tankered off site for disposal at a licensed treatment facility.