



**Cheshire West  
and Chester**

**Cheshire West and Chester Council's Representation Made at  
Deadline 8**

**Submitted at Deadline 8 – 12 September 2023**

# Cheshire West & Chester Council

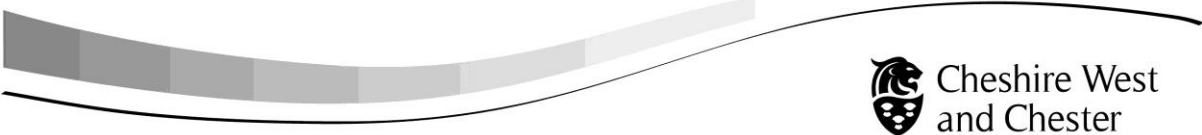
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# Cheshire West & Chester Council

## 1. Introduction

- 1.1. Cheshire West and Chester Council (**the Council**) is one of the host authorities for the for the Liverpool Bay CCS Limited's (**the Applicant**) HyNet Carbon Dioxide Pipeline DCO project (**the Project**)
- 1.2. This document is the Council's Written Representations, submitted at Deadline 8 of the Examination into the DCO.

**Table 1.1 – Response to Table 1.2 of [REP7-290] Applicants Comments on Submission Received at Deadline 6 from Cheshire West and Chester Council (CWCC) – Cover letter [REP6-039]**

Reference	IP Submission	Applicants Response	The Councils Response
<b>Drainage</b>			
2.2.1	<p>Further to the Applicant’s response to ISH2-AP5 (Table 2.3 [REP5-015]), the Council has reviewed the Outline Surface Water Management and Monitoring Plan (OSWMMP) (Document reference: D.7.43) [REP5-021] submitted at Deadline 5. A detailed review is provided within the Councils attached submission (Table 1.3 of the Councils Response to comments made at Deadline 5 - ISH2-AP5). The Council consider there is a lack of specific detail in the OSWMMP in respect the potential impacts from temporary works within and directly upon ordinary watercourses, and as a result the Council is not currently able to support the disapplication of section 23 of the Land Drainage Act 1991 without further measures in place.</p> <p>The Council would therefore reiterate its comments made at Deadline 5 (paragraph 2.3.14 [REP5-031]) that due to a lack of detail, which would appear is not able to be provided at this stage, the Council would either need protective provisions for surface water drainage or for the disapplication of section 23 of the Land Drainage Act 1991 to be removed from Article 8(c) of the draft DCO.</p> <p>To address this issue, the Council will be sending a draft set of protective provisions for the Applicant to review.</p>	<p>The Applicant and CWCC have agreed the terms of Protective Provisions for the protection of the Council as drainage authority.</p>	<p>The Council can confirm that the Protective Provisions for drainage have been agreed with the Applicant.</p> <p>The Council consider this matter to be resolved.</p>
<b>Biodiversity Surveys</b>			
2.2.2	<p>As is highlighted within paragraph 2.2 of the Council’s Written Representation Addendum at Deadline 1A [REP1A-004] incomplete biodiversity surveys have been provided in support of the application. Following meetings between the Council and the Applicant on 22 May 2023 and 13 June 2023, and in view of the percentage survey completion table to be appended to the SoCG, the Council is able to consider the matter of biodiversity survey completion to be adequately addressed. Further detail of the Council’s position on biodiversity surveys can be viewed within Table 1.2 of the attached Cheshire West and Chester Council’s response to Deadline 5 submissions</p>	<p>The Applicant can confirm that following discussions and agreement with CWCC on the cited dates, the Biodiversity Survey Percentage Completion table for Cheshire West and Chester region has been appended to the SoCG with CWCC (Appendix A) and submitted at Deadline 6 [REP6-019]. The Applicant acknowledges CWCC’s position on biodiversity survey completion and its responses provided within Table 1.2 of its Deadline 6 Submission [REP6-040] and has no further comments at this time.</p>	<p>The Council has no further comment to make.</p>
<b>Biodiversity Net Gain</b>			
2.2.3	<p>The Council notes the Biodiversity Net Gain Strategy Update submitted at Deadline 5 [REP5- 013]. The Council is advised by the Applicant to expect further updates on this document at Deadline 6, and as such the Council therefore reserves its position to make further comment at a later deadline. In addition, the Council is awaiting a revised draft s111 Agreement from the Applicant to secure a financial contribution towards BNG.</p>	<p>The Applicant can confirm that a Biodiversity Net Gain Strategy Update was submitted at Deadline 6 [REP6-033]. A revised draft of the S111 Agreement was issued by the Applicant to CWCC on 20 July 2023, and is currently reviewing a revised draft received from CWCC on 1 September 2023, with a view to finalising an Agreement before the end of the Examination. Additionally, it is anticipated that an updated BNG Strategy will be submitted at Deadline 7, capturing any further developments made following continued discussion with CWCC and the Applicant.</p>	<p>On review of the Biodiversity Net Gain Strategy Update submitted at Deadline 7 [REP7-273] the Council can that this reflects the continued discussions between the Council and the Applicant regarding BNG delivery.</p>

Reference	IP Submission	Applicants Response	The Councils Response
			The Council notes that discussions regarding costings and the Section 111 Agreement are still ongoing.
<b>Highways (Protective Provisions)</b>			
2.2.4	The Council is liaising with the Applicant with regards to the protective provisions currently included within the draft DCO and is awaiting receipt of a Planning Performance Agreement to address the practical requirements of the highway authority.	A draft Planning Performance Agreement was issued by the Applicant to CWCC on 18 July 2023.	The Council has provided comments on the draft Planning Performance Agreement on 8 September 2023. For the avoidance of doubt, the elements relating to a repetition of the New Roads and Street Works Act 1991 notices have been deleted further to the Deadline 7 <b>[REP7-306]</b> submissions that the New Road and Street Works Act 1991 applies to this project.

**Table 1.2 – Response to Table 1.3 of [REP7-290] Applicant's Comments on the Council) Response to the Applicant's Comments on Table 2.1 [REP5-015] - Cheshire West and Chester Council's Deadline 4 Submission - Cover Letter [REP4-274] Table 1.1 [REP6-040]**

Reference	IP Submission	Applicants Response at Deadline 5	The Councils Response at Deadline 6	Applicants Response at Deadline 7	The Councils Response at Deadline 8
<b>Draft DCO Requirement 13 – Construction Hours</b>					
2.3.1	With respect to the exceptions set out in Requirement 13(4), as was outlined at the ISH2 hearing, the Applicant is to further clarify its definition of “start-up and shut-down operations”. The Council welcomes this and would highlight the importance of providing such a definition within the wording of Requirement 13. The Council suggests that the Outline Construction Environmental Management Plan (OCEMP) is amended to further define “start-up and shutdown operations” and, in addition, require the provision of further	Additional drafting was proposed in revision G of the dDCO at Deadline 4. The Applicant awaits the Council's comments on that.	The Council refers the Applicant to paragraph 2.3.44 of its response to comments (Table 2-6) on its Written Representation made at Deadline 5 <b>[REP5-031]</b> .	The Applicant notes that the Council stated in row 2.3.44 of its Written Representation made at Deadline 5 <b>[REP5-031]</b> “ <i>In the absence of specific out of hours working mitigation to be approved under schemes the Council highlights the importance for tight definitions of any works or operations allowed outside the construction hours and for this reason the provided definition of “start-up and shut-down activities” under provision 13(5) of the draft DCO [REP4- 007] is not considered acceptable as it would allow activities including deliveries, unloading and unspecified general preparation work all which, if</i>	Further to the Councils response at DL 7 Cover Letter <b>[REP7-304]</b> , the Council notes the revised wording of the dDCO which includes the definition of “start-up and shut-down activities”, and revision B (September 2023) of the Outline Noise and Vibration management Plan submitted at Deadline 7 <b>[REP7-282]</b> which includes noise and vibration assessment criteria in relation to start-up and shut-down activities (Section 2.3)  In view of the above revisions the Council has no further concern in respect the ‘start-up and shut-down’ exceptions to the core working hours

Reference	IP Submission	Applicants Response at Deadline 5	The Councils Response at Deadline 6	Applicants Response at Deadline 7	The Councils Response at Deadline 8
	site-specific protective measures within the Noise and Vibration management Plan to be provided within the final CEMP. These protective measures should clearly exclude any intrusive activities / works which would result in unacceptable impacts to amenity at any specific location and should provide any necessary additional site-specific controls / mitigation.			<p><i>uncontrolled, have the potential to result in discernible impacts to sensitive receptors including residential properties and caravans.”</i></p> <p>In response the Applicant stated at Deadline 6 <b>[REP6-035]</b> “<i>The Applicant also notes that it does not agree that specific schemes are needed as this implies that there are no specific controls, already in place. This statement is incorrect and not accepted by the Applicant. The CEMP and importantly the noise and vibration management plans, as secured by Requirement 5 of the dDCO [CR3-008], do have to be approved for all works.</i>” This remains the Applicant’s position.</p>	under Requirement 13 (Requirement 14 of revision I) of the dDCO.
2.3.2	With respect to the exception set out in Requirement 13(3)(a) the Council would also ask for further clarification by the Applicant of what is meant by “ <i>trenchless construction techniques which cannot be interrupted</i> ”, including the type of operation(s), their likelihood, frequency and duration etc. It is noted that an attempt to define this is provided in paragraph 2.2.1 the OCEMP <b>[REP2-021]</b> , however, this is not considered to provide sufficient information to establish the potential for amenity impacts which may need further / additional controls.	Chapter 3 <b>[REP4-029]</b> provides, in paragraph 3.6.110, information relating to the duration of the works at trenchless crossings. It states that the duration of 24 hour working at the majority of trenchless crossings is not likely to exceed a period of days, though the longer crossings in difficult ground conditions are expected to last up to four weeks. This is expected to be for seven trenchless crossing, at six specific crossing locations, as highlighted in Appendix 3.1 Table of Trenchless Crossings of the ES <b>[REP4-070]</b> . Information to establish the potential for noise and vibration significant effects related to trenchless construction techniques is	<p>In order for the Council to better understand which activity/activities are proposed to be excluded from Requirement 13.3(a), it is requested that further detail / clarification of the process of trenchless crossing including equipment used and the likely resulting noise sources etc is provided.</p> <p>Considering paragraphs 3.6.55-3.6.56 of the Environmental Statement – Description of the DCO Proposed Development <b>[REP4-029]</b>, identify activities such as the excavation of entrance and exit pits which presumably can be undertaken in the daytime and do not need to be done at night. The Council wishes to clarify which aspect of trenchless crossing construction has to be done at</p>	<p>The Applicant can confirm that only actual ‘drilling’ stage of a trenchless crossing is to be undertaken over a 24h period. All site setup, entrance and exit pit excavation it to be undertaken in normal working hours.</p> <p>The details of noise generated at night can be found in paragraph 15.5.20 Chapter 15 Noise and Vibration of the Environmental Statement (ES) <b>[REP4-053]</b>. Results are described in Paragraph</p> <p>15.11.5 along with values in Table 15.33. Source noise levels used in the noise prediction are shown in Table 2 of Appendix 15.2 <b>[REP4-148]</b>.</p>	<p>Further to the Councils response at DL 7 cover letter <b>[REP7-304]</b>, as part of discussions between the Council and The Applicant including an e-mail sent by the Applicant dated 04.08.2023, where a definition of “<i>trenchless construction techniques which cannot be interrupted</i>” to be inserted within the wording of Requirement 13 (Requirement 14 of Revision I) of the dDCO has been provided:</p> <p><i>“trenchless construction techniques which cannot be interrupted” means drilling, tunnelling, boring or similar construction methods used to create an underground route for the pipeline without trenching from the surface, and includes any necessary ancillary activities to that drilling, tunnelling or boring; but does not include</i></p>

Reference	IP Submission	Applicants Response at Deadline 5	The Councils Response at Deadline 6	Applicants Response at Deadline 7	The Councils Response at Deadline 8
		<p>presented in Chapter 15 [REP4-053].</p> <p>Residual effects related to noise from trenchless activities during evening and night-time are presented in Table 15.32 and Table 15.33 of Chapter 15 [REP4-053].</p> <p>Paragraph 15.10.2 of Chapter 15 [REP4-053] states that trenchless installation activities during evening and night-time, at locations where the period exceeds the duration defined in paragraph 15.5.56 of the same chapter, will require careful consideration to include secondary mitigation including measures such as acoustic enclosures for ancillary equipment which is kept above ground for the whole duration of the activity. It is also stated that the production of a Noise and Vibration Management Plan and agreement with the Local Authorities is included in Requirement of the Draft DCO [REP4-008].</p>	<p>night and that they are proposing to exclude via requirement 13.3(a).</p>		<p><i>operations to prepare for drilling, tunnelling and boring, and specifically does not include works of excavation of pits, or works to remediate the site of pits used for drilling, tunnelling and boring.”</i></p> <p>The Council note that Revision I of the draft DCO submitted at Deadline 7 [REP7-016] does not include the above additional text for the definition of “<i>trenchless construction techniques which cannot be interrupted</i>” under requirement 13.</p> <p>The Applicant has acknowledged this omission and have advised that a further revision to the draft DCO is to be made at Deadline 8 to include the above text.</p> <p>The Council is satisfied that, subject to the inclusion of the above definition of “<i>trenchless construction techniques which cannot be interrupted</i>” within Requirement 13 (14) of the dDCO, it would have no further concern in respect this exemption to the core working hours.</p>
2.3.3	<p>Whilst the Council accepts that certain operations including continuous drilling will be required as part of the Project, the Council’s concerns lie where such continuous operations occur in very close proximity to residential uses and in particular residential caravans. This issue is particularly highlighted where an established traveller site lies immediately adjacent to the</p>	<p>Paragraph 15.10.4 of Chapter 15 [REP4-053] states that the construction programme will seek to minimise the duration of high noise generating construction activities, as far as practicably possible. Where construction activities near sensitive areas are expected to affect residents with a magnitude of medium and high and exceed the durations of 10 or more days or nights in any</p>	<p>In view of the Outline Noise and Vibration Management Plan (paragraph 4.6.6) submitted at Deadline 5 [REP5-017] the Council consider that adequate mitigation would be provided for occupants of caravans. However, as noted at paragraph 2.2.3 above, further clarifications are still required as to the specific out of hours operations relating to trenchless crossing works.</p>	<p>As stated in row 2.3.2 above, the Applicant can confirm that only actual ‘drilling’ stage of a trenchless crossing is to be undertaken over a 24-hour period. All site setup, entrance and exit pit excavation it to be undertaken in normal working hours. A list of the plant alongside the associated source noise levels used in the noise prediction are shown in Table 2 of Appendix 15.2 [REP4-148].</p>	<p>Please see paragraph 2.2.2 above. This matter is considered to be resolved.</p>

Reference	IP Submission	Applicants Response at Deadline 5	The Councils Response at Deadline 6	Applicants Response at Deadline 7	The Councils Response at Deadline 8
	<p>order limits and the trenchless crossing of the A5117.</p>	<p>15 consecutive days or nights, or a total number of days exceeding 40 in any 6 consecutive months, then a set of enhanced mitigation measures will be discussed and agreed with the Local Authority.</p> <p>Temporary re-housing will be also considered through consultation with the Local Authority for specific locations where other mitigation measures do not provide sufficient attenuation to prevent sleep disturbance during activities in the night-time period.</p> <p>The Outline Noise and Vibration Management Plan set the principles which will be followed by the Contractor during detailed design and the entire construction period. It states that a Section 61 application will be submitted in advance of the trenchless activities in close proximity to sensitive receptors and exceeding 10 or more days or nights in any 15 consecutive days or nights, or a total number of days exceeding 40 in any 6 consecutive months. This will give the Local Planning Authority an opportunity to approve the consent. In addition, noise monitoring locations will be agreed with the Local Authority including a management plan with actions for the Contractor when the agreed trigger noise levels are exceeded.</p>		<p>It should be noted that Chapter 15 <b>[REP4-053]</b> presents a worst-case assessment for the trenchless crossing activities. The assessment assumes that items of plant shown in Table 2 of Appendix 15.2 <b>[REP4-148]</b> are located at both ends of the crossing, entry and exit pits. This represents a worst-case scenario as it is most likely that all noisy equipment will be located near the entry pit. Also, a worst-case assessment has been undertaken to assume that trenchless crossing activities will occur simultaneously leading to potential for cumulative effects at some properties within close proximity to more than one trenchless crossing. In practice, each trenchless crossing activity will occur independently. Therefore, the number of properties shown in this chapter subject to adverse effects during night-time are a worst-case scenario.</p>	



Reference	IP Submission	Applicants Response at Deadline 5	The Councils Response at Deadline 6	Applicants Response at Deadline 7	The Councils Response at Deadline 8
2.3.4	The criteria for when mitigation including re-homing for significant noise impacts will occur is set out in paragraphs 15.10.3, 15.5.30 and 15.5.56 of Chapter 15 of the Environmental statement [APP-067]. Whilst this is accepted as appropriate for housing, it is not accepted for caravans. Without further clarification and consideration of the scale, type and likelihood of uninterruptible trenchless operations and consideration for any specific mitigation, including appropriate criteria for this, and potentially other sensitive locations, the Council remains concerned in respect the current wording of Requirement 13.	Residual effects related to noise from trenchless activities during evening and night-time are presented in Table 15.32 and Table 15.33 of Chapter 15 of the ES [REP4-053]. It can be seen from the table that potential significant effects are located in sections 4 and 5 of the DCO Proposed Development.	Please see paragraph 2.2.4 above.	Please see paragraph 2.2.4 above.	Please see paragraph 2.2.2 above. This matter is considered to be resolved.
2.3.5	To address the above, the Council suggests that the OCEMP further define uninterruptible trenchless operations and specify the need for a “Special Cases” statement, or similar, to be provided as part of the noise and vibration management plan, as part of the final CEMP, and that this is referenced in the definition of “trenchless construction techniques which cannot be interrupted” under Requirement 13. The “Special Cases” statement should include the requirement for the identification of any buildings and/or their occupants which may not be adequately protected by the thresholds set out in Para. 15.5.30/15.5.56 of Chapter 15 of the	The Applicant confirms that the Outline Noise and Vibration Management Plan (document reference: <b>D.7.39</b> ), as submitted at Deadline 5, includes a requirement for the Construction Contractor during the preparation of the detailed Noise and Vibration Management Plan and any Section 61 application to identify any buildings and/or their occupants which may not be adequately protected by the significance criteria in Chapter 15 [REP4-053]. As part of this process, the Construction Contractor will agree with the Local Planning Authority suitable criteria for temporary re-housing in accordance with guidance in BS5228-1 Annex E (Informative).	Please see paragraphs 2.2.3 and 2.2.4 above.	Please see paragraph 2.2.3 above	Please see paragraph 2.2.2 above. This matter is considered to be resolved.

Reference	IP Submission	Applicants Response at Deadline 5	The Councils Response at Deadline 6	Applicants Response at Deadline 7	The Councils Response at Deadline 8
	Environmental Statement [APP-067], including people dwelling in caravans, and should include and site-specific noise trigger levels and/or alternative noise control measures.	The Applicant will arrange a meeting with the Local Planning Authority to make sure the concerns are addressed.			

Table 1.3 – The Council’s Comments on the Applicants Update on the DCO Drafting [REP7-294]

Paragraph	Protective Provisions Drafting	The Council’s Response
<b>13. LOCAL HIGHWAY AUTHORITIES</b>		
13.1	The terms of the Protective Provisions for the protection of local highways authorities are under discussion with CWCC and FCC.	The Council’s position is confirmed in its Deadline 7 submission [REP-306].  For the avoidance of doubt, the Council has submitted its preferred set of Protective Provisions and would urge the Examining Authority to include this version in the final version of the DCO.
13.2	The Applicant cannot agree to CWCC’s deletion of the ability for the undertaker to undertake the highway conditions survey – if the undertaker’s contractors are qualified there is no reason why they should not be able to undertake the surveys.	The Council needs a comparable highway condition survey and therefore has included a definition in its preferred Protective Provisions submitted at Deadline 7 [REP7-306], [REP7-300] and [REP7-301]. If a comparable highway condition survey is not undertaken, the Council will incur additional costs in comparing two sets of different data and data standards. The Council therefore requires the wording contained in its Protective Provisions submitted at Deadline 7 [REP7-300] submission to be retained.
13.3	The Applicant cannot agree to CWCC’s requirement for the highway conditions surveys to be undertaken by “Gaist”, which appears to be a specific company offering surveys. For procurement reasons, the undertaker cannot agree to reference a specific provider in the protective provisions. Additionally, these	The Council accepts this position and has instead included in its Protective Provisions submitted at Deadline 7 [REP7-300] the following definition:  <i>“highway condition surveys” means a specialist condition survey consisting of high quality image data including the footways on both sides of the road seamlessly knitted into a high definition video</i>

Paragraph	Protective Provisions Drafting	The Council's Response
	protective provisions will apply to FCC, whose preferred supplier may not be Gaist.	<p><i>providing a complete view of the roadscape divided into polygons, categorised into 5 grades, based on the different damage types and their severity and mapped on OS Mastermap. Supplied as a video survey and file for import into GIS systems to enable further analysis of the defects identified. A principle bridge inspection of the structures affected will also need to be undertaken</i></p> <p>In relation to the need for consistency of approach, the Council's suggestion is to make the Protective Provisions for the benefit of Cheshire West and Chester Council only with Flintshire County Council having its own set of Protective Provisions in relation to highways matters.</p>
13.4	The Applicant cannot agree to CWCC's requirement for the highway conditions surveys to be undertaken on any highways utilised for the delivery of the authorised works. This would be disproportionate given many of the relevant roads will be trunk roads. The Applicant has asked CWCC to narrow this to specific highways of concern.	The Council has repeatedly asked the Applicant for a list of highways affected by the DCO. This has not been provided to date and therefore in default and without this information, the Council can only assume that all highways in the Council's administrative area are being affected by the project. The Council is submitting a complete list of highways in its administrative area at Deadline 8.
13.5	The Applicant cannot agree to CWCC's proposed wording requiring the undertaker to fund an appropriately qualified officer or agent to participate in the design process for the specified works. This work relates to the carrying out of the Council's statutory functions and should already be funded, and should be carried out by the Council through an officer and not an external agent.	The Council's statutory function is to maintain highways within its administrative area. The Council has no existing resource to undertake a design function in relation to this DCO and therefore would require the relevant expertise to be procured. The Council expects this additional cost created due to this project to be paid in full by the Applicant rather than causing a significant dent in the public purse to a relatively small local authority.
13.6	The Applicant cannot agree to CWCC's requirement to give an appointed officer 'unhindered' access to the specified work for inspection. This simply may not be possible due to CDM compliance requirements. Access must be taken in accordance with health and safety and site security requirements.	The Council has already provided a caveat to such access in that it is more than prepared for its officers and/or agents to have a site induction and for its access to be 'subject to any reasonable adjustments necessary for the safety of such officer or agent'. The Council is at a loss as to why this is such a fundamental issue for the Applicant.
13.7	The Applicant considers that its drafting of the rectification provisions should be included in the Protective Provisions. This paragraph provides that, where street works require to be undertaken to the reasonable satisfaction of the local highway authority, the authority will inspect the street works once completed. Where any defects arise in the 24 month period following the authority's last inspection, the authority may recover from the undertaker the reasonable costs of repairing or rectifying any defects. This period was extended from 12 to 24 months at the request of both Councils following the first set of hearings. FCC want the paragraph to be included in the Protective Provisions. CWCC have asked for it to be deleted.	<p>The Council does not consider the rectification provision to be necessary. The representation made by the Council at Deadline 7 <b>[REP7-306]</b> on the application of the New Roads and Street Works Act 1991 means that this rectification provision is both unnecessary and is already provided for in the specification for the reinstatement of openings in the highway (4<sup>th</sup> ed).</p> <p>The Council did not request the period to be extended from 12 to 24 months – this was requested by Flintshire County Council to align with the provisions contained in the New Roads and Street Works Act 1991. However, due to the New Roads and Street Works Act 1991 applying alongside to the DCO, the Council's position supersedes this point.</p> <p>If Flintshire County Council takes a different approach to the Council, then the Council would request that separate Protective Provisions are provided for each authority rather than for the benefit of the highway authorities collectively.</p>
13.8	CWCC's position is that it will not do any works to rectify defects in street works carried out by the undertaker. However, the undertaker will not have a contractor in place or on site for the full 24 month defects period, and therefore it is considered reasonable to allow for a process for the local highways authority to repair or rectify any defects. The wording of the Protective Provisions does not oblige CWCC to rectify defects, and there is therefore no prejudice to CWCC if the wording is retained. This approach was originally agreed with CWCC in June however no comments on the draft were received until late August when the provision was struck through. The Applicant is disappointed that CWCC not only changed position without notice but did so at such a late stage that there has not been sufficient time to resolve this point.	<p>The Council is funded by the public purse and due to its limited resources is unable to commit to rectifying any defects to the highway in its area caused by a third party pursuant to its development aspirations. In any event, as per the response to 13.7 above, any defects are to be rectified by the Applicant pursuant to section 70 of the New Roads and Street Works Act 1991.</p> <p>In any event, the Council's position aligns with its Deadline 7 submission <b>[REP7-306]</b> on the application of the New Roads and Street Works Act 1991.</p>

Paragraph	Protective Provisions Drafting	The Council's Response
13.9	The Applicant accordingly submits that its preferred version should be taken forward.	The Council disagrees with the Applicant and considers its preferred version of the Protective Provisions [REP7-300] is more accurate and is acceptable to the Council in its capacity as highway authority and should be taken forward.

**Table 1.4 – The Councils Comments on Outline Construction Traffic Management Plan Rev E [REP7-241]**

Paragraph	Text	The Councils Response
5.5.3	These are presented in <b>Figure 17-7 - Road Diversions (Volume IV of the ES) [CR1-095]</b> .	The Council notes that the diversion routes included have not been indexed and is not clear which route is used for which closure.
7.2.10	Picton Lane to the south of the Ashwood Drive Junction will be closed to the public and accessible to / from the north by site traffic only. The residents of Picton will be directed to travel south on Picton Lane through to Mickle Trafford which has good connectivity to the A56 or M53 should vehicles want to return north.	The Council notes that the access for farm traffic been deleted and asks the Applicant to confirm why this is the case.
7.2.18	To support access / egress from the north on Rake Lane a one-way system around Chorlton Lane, Little Rake Lane and the section of Rake Lane between the junctions of these roads will be introduced. Traffic accessing the Site from the A5117 heading southbound will turn onto Little Rake Lane (one-way operation southbound) and then turn left onto Chorlton Lane. Traffic exiting the site will continue on north on Chorlton Lane (one-way northbound) until the junction with Rake Lane and then turn right onto Rake Lane with the section of Rake Lane through to the Little Rake Lane junction being one-way northbound. Residents / through traffic travelling north on Chorlton Lane will still have the option to turn left at the junction with Rake Lane to continue through to the A41.	The Council notes that the diversion routes included have not been indexed and is not clear which route is used for which closure.  The Council notes that the stated one-way system is not detailed on the plan, only intended route indicated. This is also contrary to D.6.4.17.4 construction traffic routes, due to the one way system vehicles cannot return via same route (Little Rake Ln).
7.3.4	The following mitigation is proposed:  <ul style="list-style-type: none"> <li>• During the Construction Stage, advanced warning signage will be implemented to slow vehicle speeds on approach to construction accesses and warn other road users of site traffic</li> <li>• Provision of Manual for Streets (MfS) compliant visibility splays with associated verge trimming and clearance; and</li> <li>• It is recommended that 'Slow' road markings on the eastbound approach to the permanent access location to reduce 85th percentile speeds are implemented for the operation and maintenance stage of the DCO Proposed Development.</li> </ul>	The Council notes that the CC CTR 2 and BVS CTR 1 routes are incorrect and they do not account for one-way systems, hence the Council requiring detailed diversion route indexed per closure/works location.