

**SCOPING OPINION**  
**Proposed**  
**Felixstowe to Nuneaton Freight**  
**Capacity Enhancement -**  
**Ipswich Chord**

September 2010



independent impartial inclusive



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## Executive Summary

This is the Infrastructure Planning Commission's (the Commission's) Scoping Opinion (the opinion) in respect of the content of the environmental statement, submitted by Jacobs Engineering UK Ltd on behalf of Network Rail, for a proposed new railway chord on land to the west of Ipswich town centre.

This report sets out the Commission's opinion on the basis of the information provided in Jacobs Engineering UK Ltd's report entitled 'Felixstowe to Nuneaton Freight Capacity Enhancement – Ipswich Chord, Environmental Scoping Report (May 2010). The opinion can only reflect the proposals as currently described by the applicant.

The Commission has consulted on the scoping report and the responses received have been taken into account in adopting this opinion. The Commission is satisfied that the topics identified in the scoping report encompass those matters identified in Schedule 4, Part 1, paragraph 19 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.

The Commission draws attention both to the general points and those made in respect of each of the specialist topics in this opinion. The main issues identified are:

- the historical contamination of the land and its potential to pollute the major aquifer which underlies the site, particularly as piling is a likely construction method. Clarification of method for further phased ground investigations, remediation techniques (in-situ or ex-situ) and removal of contaminated waste material from site during construction (including Giant Hogweed);
- other construction impacts including noise and vibration, dust and transportation impacts;
- potential impact on ecology given that a number of protected species are known to be present on the site or in the surrounding area and that the site is upstream of the Stour and Orwell Estuary Ramsar and Special Protection Area (SPA);
- risk of impact on river quality, particularly during construction, as the River Gipping which flows next to the site, is currently designated 'Good' in respect of chemical quality and 'Very Good' with regard to biological quality;
- landscaping and earth movements for railway sidings and embankment modifications;
- potential disruption to traffic and transport movements during construction, particularly along the River Gipping and the Sproughton Road, where new crossings are proposed; and
- visual impact on nearby sensitive receptors.

Matters are not scoped out unless specifically addressed and justified by the applicant and confirmed as being scoped out by the Commission.

## 1.0 INTRODUCTION

### Background

- 1.1 On 27 July 2010, the Commission received a scoping report submitted by Jacobs Engineering UK Ltd on behalf of Network Rail (the applicant) under Regulation 8 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (SI 2263) (the EIA Regs) in order to request a scoping opinion for a proposed new railway chord at Ipswich. This scoping opinion is made in response to this request and should be read in conjunction with the scoping report.
- 1.2 The EIA Regs enable an applicant, before making an application for an order granting development consent, to ask the Commission to state in writing its formal opinion (a 'scoping opinion') on the information to be provided in an environmental statement (ES).
- 1.3 In submitting the information included in their request for a scoping opinion, Network Rail is deemed to have notified the Commission under Regulation 6(1)(b) of the EIA Regulations that it proposes to provide an ES in respect of the proposed railway chord at Ipswich. The proposed development is determined to be EIA development in accordance with Regulation 4.
- 1.4 Before adopting a scoping opinion the Commission (or the relevant authority) must take into account:
- 'the specific characteristics of the particular development;
  - the specific characteristics of the development of the type concerned;
  - the environmental features likely to be affected by the development'.
- (EIA Regs 8 (9))*
- 1.5 This opinion sets out what information the Commission considers should be included in the ES for the proposed railway chord. The opinion has taken account of:
- i the EIA Regs;
  - ii the nature and scale of the proposed development;
  - iii the nature of the receiving environment; and
  - iv current best practice in the preparation of environmental statements.
- 1.6 The Commission has also taken account of the responses received from the statutory consultees. It has carefully considered the matters addressed by the applicant and has used professional judgement and

experience in order to come to this opinion. The Commission will take account of relevant legislation and guidelines when considering the ES. The Commission will not be precluded from requiring additional information in connection with the ES submitted with that application when considering any application for a development consent order.

- 1.7 This opinion should not be construed as implying that the Commission agrees with the information or comments provided by the applicant in their request for an opinion from the Commission. In particular comments from the Commission in this opinion are without prejudice to any decision taken by the Commission on submission of the application that any development identified by the applicant is necessarily to be treated as part of a nationally significant infrastructure project or associated development, or development that does not require development consent.
- 1.8 Regulation 8(3) of the EIA Regs states that a request for a scoping opinion must include:
- i. a plan sufficient to identify the land;
  - ii. a brief description of the nature and purpose of the development and of its possible effects on the environment;
  - iii. such other information or representations as the person making the request may wish to provide or make.
- 1.9 The Commission considers that this has been provided in Network Rail's scoping report.

## **Commission's Consultation**

- 1.10 The Commission has a duty under Regulation 8(6) of the EIA Regs to consult widely before adopting a scoping opinion. A full list of the consultation bodies is given at Appendix 1. The list of respondents, with copies of those comments is given at Appendix 2, to which reference should be made.
- 1.11 The ES submitted by Network Rail must also demonstrate consideration of points raised by the statutory consultees. It is recommended that a table is provided in the ES summarising the scoping responses from the statutory consultees and how they are considered in the ES.
- 1.12 Any subsequent consultation responses, received after the statutory deadline for receipt of comments, will be forwarded to the applicant and should be given due consideration by the applicant in carrying out the EIA.

## **Structure of the Document**

1.13 This document is structured as follows:

Section 2 The Proposed Development;

Section 3 EIA Approach and Topic Areas;

Section 4 Other Information;

Appendix 1 Consultation Bodies;

Appendix 2 Respondents to Consultation and Copies of Replies;

Appendix 3 Presentation of the Environmental Statement.



## 2.0 THE PROPOSED DEVELOPMENT

### Applicant's Information

- 2.1 The following is a summary of information on the site and surroundings prepared by the applicant. The Commission has not verified the accuracy of this information.

#### The Need for the Proposals

- 2.2 The proposed Ipswich chord is one part of an overall scheme called the Felixstowe to Nuneaton Freight Enhancement Project. The scheme is designed to provide capacity for the increasing demand for freight paths from the Port of Felixstowe. The proposed chord will connect the Great Eastern Norwich main line to the Lowestoft and Folkestone branch line thereby bypassing the Ipswich Yard and relieving a capacity restriction from the Felixstowe to Nuneaton route.

#### Description of the Development

- 2.3 The proposed new rail chord will be approximately 1.1km long and will link the Great Eastern Norwich main line to the Lowestoft and Felixstowe branch line. This line will effectively by-pass the Ipswich rail yard and thereby enhance freight capacity on this section of line.
- 2.4 The proposed line will be laid on an embankment so that it is at the same level as the existing lines. An embankment will, therefore, also need to be constructed.
- 2.5 To allow the new line to cross the River Gipping and the Sroughton Road, two new bridges will need to be constructed.
- 2.6 Other works which will be required are: the widening of the embankment carrying the Great Eastern Norwich line; modifications to the overhead electric lines and signalling alterations.
- 2.7 Site structures which have the potential to create a visual impact include the proposed railway embankment, the River Gipping bridge, the extension to the Sroughton Road bridge and the embankment or retaining walls to be constructed along the Great Eastern Norwich main line.

#### The Existing Site

- 2.8 The proposed new rail chord site lies approximately 2 kilometres west of Ipswich town centre, centred on Grid Reference 614264, 244951.

- 2.9 The land through which the proposed chord will pass is generally triangular in shape, bordered on the north-west side by the River Gipping; on the east side by the Lowestoft and Folkestone branch line and on the south-west side by the Great Eastern Norwich main line. The land consists of hard standing, scrub and grassland upon which stands a number of disused industrial buildings comprising a former manufacturing site known locally as the Bacon Factory.
- 2.10 Previous land quality assessments carried out at the site indicate some contamination of the soil with a range of potential pollutants including: hydrocarbons, ammonium, heavy metals, pathogens and asbestos fibres. The groundwater beneath the site was also found to be contaminated with ammonium.
- 2.11 The topography of the site dips slightly towards the north and the River Gipping.
- 2.12 There are no listed buildings or historic designations within the site boundary or in the area immediately surrounding the site.
- 2.13 There are no statutory designated wildlife sites within the proposed Ipswich chord site.
- 2.14 Previous ecological surveys have shown that a number of protected species, including reptiles (particularly slow worms, common lizards and grass snakes), bats, water voles and otters, are present on the site or in the surrounding area. Giant Hogweed, a non-native species controlled under the Wildlife and Countryside Act 1981, is present on the site.

#### The Surrounding Area

- 2.15 The area immediately surrounding the site is primarily commercial and industrial. To the north-west of the site, across the River Gipping, lies the Boss Hall Business Park within which are commercial buildings and a supermarket. Over the Lowestoft and Folkestone branch line, which runs along the eastern edge of the site, is the Hadleigh Road Industrial Estate whilst across the Great Eastern Norwich main line lies the Elton Park Industrial Estate and some housing.
- 2.16 To the south of the site is Hadleigh Road, with housing on its southern side. Further afield, particularly to the north, east and south-west there are residential areas.
- 2.17 The River Gipping, which borders the site to the north, is a County Wildlife Site (CWS) as is the Alderman Canal which lies 1.2 km to the south-east. The Stour and Orwell Estuary Ramsar and Special Protection Area (SPA) lies approximately 3km to the south of site. Water from the River Gipping (known as the River Orwell downstream

of its tidal limit), bordering the development site, eventually flows into the SPA.

- 2.18 Water quality in the River Gipping is measured by the Environment Agency at Bramford Mill, approximately 2km upstream of the site. The most recent data available, from 2008, show that the chemical quality of the water was Grade B (good), whilst the biological quality was Grade A (very good).
- 2.19 The site is situated within the outer area of a Groundwater Source Protection Zone (GSPZ) created to protect the major aquifer present in the Upper Chalk which underlies the site. Previous studies have indicated that it is likely that the groundwater is in hydraulic continuity with the overlying drift deposits which are, in turn, in hydraulic continuity with the River Gipping.
- 2.20 Data collected by Ipswich District Council indicate that the concentrations of air pollutants in the immediate vicinity of the proposed site are not sufficiently high to require the designation of an Air Quality Management Area (AQMA). However, AQMAs have been designated in other areas of Ipswich including an area 1km east of the site which is monitored for NO<sub>2</sub> (nitrogen dioxide) and PM<sub>10</sub> (particles less than 10 micrometres), the high concentrations of which are thought to be caused by road vehicle emissions.
- 2.21 There are no listed buildings or Scheduled Ancient Monuments in the vicinity of the proposed development site. A number of articles of archaeological interest have been found in the area of west Ipswich in which the site is located including a Bronze Age collared urn on the proposed site itself.

#### Access

- 2.22 Road access to the site is direct from Hadleigh Road, which lies at the southern tip of the triangular site.
- 2.23 Rail access to the site is also possible from either the Lowestoft and Folkestone branch line or the Great Eastern Norwich main line.

#### Construction

- 2.24 It is proposed that construction work commences in 2012 with completion in 2014.
- 2.25 Construction activities are likely to be as follows:
- Site clearance;
  - Contaminated land and possible on-site remediation;

- Piling;
- Earthworks;
- Transportation of construction materials and soils to and from site; and
- Rail construction.

2.26 There will be some night time working in order to minimise daytime disruption to the working rail lines.

### **Commission's Comment**

2.27 The Applicant should ensure that the description of the proposed development that is being applied for is sufficiently clear and accurate, as this will form the basis for the environmental assessment. The dimensions of the proposed development should be clearly described in the ES, with appropriate justification and sufficient explanation. It will also be important to consider choice of materials, colour and the form of any buildings and structures. Lighting proposals should also be described.

2.28 In line with best practice and case law, the proposed development will need to be defined in sufficient detail in the ES to enable a robust assessment of the adverse and positive impacts to be undertaken.

2.29 Whilst the Commission acknowledges that it may be necessary for design parameters to be sufficient to allow for minor variations in the scheme design, such parameters should not be so great that any variations would effectively constitute a material departure from the scheme design assessed in the EIA or result in a different assessment outcome. The ES should be able to confirm that any changes to the development within the proposed parameters would not result in significant effects not previously identified. The EIA should be carried out on the basis of the most likely design(s) and should identify the worst case in terms of environmental impacts.

2.30 The Commission notes that the proposed railway chord is likely to consist of two tracks rather than a single track. Should this change alter the proposed development land boundary, as shown on the submitted red line plan, it will be necessary to submit a further scoping request that inter alia complies with Regulation 8(3) of the EIA Regs. In any event, any changes in the environmental impacts caused by this amendment should be discussed with the statutory and other consultees and appropriate revisions made to the scope of the ES to reflect this modification. The Commission's comments in paragraphs 2.27, 2.28 and 2.29 above should also be noted in this regard.

2.31 The Commission recognises that the process of EIA is iterative and therefore the proposals may change and evolve. There may be

changes to the scheme design in response to consultation. Such changes should be addressed in the ES. Once submitted, the application should not change in any substantive manner as the Commission is not able to entertain material changes to the project after acceptance.

- 2.32 It should be noted that if the development changes substantially during the EIA process the Applicant may wish to consider the need to request a new scoping opinion.
- 2.33 The Commission recommends the ES should include a clear description of all the aspects of the proposed development, including timescales, at the construction, operation and decommissioning stages, including:
- Land use requirements;
  - Site preparation;
  - Operational requirements including the main characteristics of the production process and the nature and quantity of materials used, as well as waste arisings;
  - Emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc).
- 2.34 In terms of decommissioning, the Commission acknowledges that the further into the future any assessment is made, the less reliance may be placed on the outcome. However, the purpose of such a long term assessment is to enable the decommissioning of the works to be taken into account in the design and use of materials such that structures can be taken down with the minimum of disruption, materials can be re-used and the site can be restored or put to a suitable new use. The Commission encourages consideration of such matters in the ES.
- 2.35 The Commission considers that the ES should contain information on how the materials will be transported to site including; abnormal loads and the frequency of deliveries, and the proposed construction methods.
- 2.36 In the event that any works or infrastructure are required off-site, as associated development or as an ancillary matter, then such works/infrastructure should be considered as part of an integrated approach to environmental assessment.
- 2.37 The ES must contain and set out an outline of the main alternatives studied by the Applicant and provide an indication of the main reason for the Applicant's choice, taking account of the environmental effects (Schedule 4, Part 1, paragraph 18). The reasons for the preferred choice should be made clear and the comparative environmental effects of each option identified in the ES.



## **3.0 EIA APPROACH AND TOPIC AREAS**

### **General Comments on the Scoping Report**

- 3.1 The scoping report (Felixstowe to Nuneaton Freight Capacity Enhancement – Ipswich Chord, Environmental Scoping Report, Jacobs Engineering UK Ltd, May 2010) sets out the proposed four volume format of the ES: Volume 1: Non-technical Summary; Volume 2: Main Statement; Volume 3: Technical Appendices and Supporting Information; and Volume 4: Figures, Photographs and Plans. The Commission notes that the ES should be a stand alone document and should include all appendices as well as any photographs or photomontages.
- 3.2 Where specific assessments are intended to be produced, such as the flood risk assessment and sustainability statement, if the Applicant intends to refer to these reports in the ES, sufficient information should be included in the ES as the Applicant will not be able to cross-refer to any stand alone documents outside of the ES.
- 3.3 On the basis that such information will be made available and included in the ES, the Commission is satisfied with the approach proposed for the format.
- 3.4 The description of Volume 2 of the ES in the scoping report includes a preliminary format. The Commission recommends that the 'Detailed description of the scheme and its environmental context' should include a description of the proposed construction programme and methods.
- 3.5 The Commission recommends that the physical scope of the study areas should be identified under all the environmental topics and should be sufficiently robust in order to undertake the assessment. The extent of the study areas should be on the basis of recognised professional guidance, whenever such guidance is available. The study areas should also be agreed with the relevant consultees and, where this is not possible, this should be stated clearly in the ES and a reasoned justification given.
- 3.6 With regard to the geographical scope of the ES, the Applicant's attention is drawn, in particular, to the comments provided by Transport for London, Suffolk Coastal District Council and East Cambridgeshire District Council in Appendix 2.
- 3.7 The Commission recommends that the baseline data are comprehensive, relevant and up-to-date. Surveys needed to inform the EIA are not fully defined or provided within the scoping report and will

need to be addressed. The timing and scope of all surveys should be agreed with the relevant statutory bodies.

- 3.8 The Commission considers that the assessment should consider all phases of the use – construction, operation and decommissioning. Within the specialist topic sections there is no specific mention of the decommissioning phase and the Commission recommends that this should be addressed in the EIA. The methodology should use up to date regulations and guidance to undertake the assessment and the methodology should be agreed with the relevant consultees. Where this is not possible, a reasoned justification should be given in the ES.
- 3.9 The Commission recognises that the way in which each element of the environment may be affected by the development can be approached in a number of ways but considers that it would be helpful, in terms of ease of understanding and in terms of clarity of presentation, to consider the impact assessment in a similar manner for each of the specialist topics. The Commission welcomes the common format proposed (see section 5 of the scoping report) but considers that the scope – the breadth of topic and the physical and temporal coverage should be described and justified.
- 3.10 The inter-relationship between specialist topics should not be overlooked, indeed this is a requirement of the Regulations. The ES should not be a series of separate reports collated into one document, but rather a comprehensive assessment drawing together the environmental impacts of the proposed development as a whole.
- 3.11 The Commission recommends that other major developments in the area should be taken into account, through consultation with the local planning authorities, on the basis of major developments that are :
- built and operational;
  - under construction;
  - permitted application(s), but not yet implemented;
  - submitted application(s) not yet determined, and if permitted would affect the proposed development in the scoping report; and
  - identified in the Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that much information on any relevant proposals will be limited.
- 3.12 Matters are not scoped out unless specifically addressed and justified by the applicant and confirmed as being scoped out by the Commission.

- 3.13 Reference should be made to Appendix 3 regarding the presentation of the environmental statement.

## Topic Areas

### General Comments

- 3.14 The EIA Regulations Schedule 4, Parts 1 and 2, set out the information for inclusion in an ES.
- 3.15 Schedule 4 Part 1 of the EIA Regulations sets out the aspects of the environment likely to be significantly affected by the development which should include *'in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors'* (paragraph 19).
- 3.16 Traffic and transport is not specified as a topic for assessment under Schedule 4; although in line with good practice the Commission considers it is an important consideration *per se*, as well as being the source of further impacts in terms of air quality and noise and vibration.
- 3.17 Part 2 sets out the minimum requirements and is included below for reference:

#### Schedule 4 Part 2

- a description of the development comprising information on the site, design and size of the development;
  - a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects;
  - the data required to identify and assess the main effects which the development is likely to have on the environment;
  - an outline of the main alternatives studies by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects;
  - a non-technical summary of the information provided [*under the four paragraphs above*].
- 3.18 The scoping report has considered the environment under the following topics:
- Air Quality and Climate Change;
  - Noise and Vibration;
  - Townscape and Visual Amenity;
  - Ecology;
  - Geology, Soils and Contaminated Land;
  - Water Quality, Hydrology and Hydrogeology;

- Archaeology and Cultural Heritage;
  - Traffic and Transport;
  - Socio-economic;
  - Sustainability; and
  - Cumulative Effects.
- 3.19 The Commission is satisfied that the topics identified in the scoping report encompass those matters identified in Schedule 4, Part 1, paragraph 19 of the EIA Regs.
- 3.20 The Commission recommends that an assessment of the environmental effects associated with the generation and elimination of waste be added as a topic to the ES in accordance with Schedule 4, Part 1, paragraph 20 of the EIA Regs. This assessment should clarify the environmental effects of all wastes to be processed and removed from the site and identify impacts associated with relevant traffic movements and routes.
- 3.21 The Commission considers that the effects of the scheme on telecommunications systems in the area should also be assessed.
- 3.22 The attention of the Applicant is drawn to the comments of the Health Protection Agency (see Appendix 2) with regard to the content of the ES.
- 3.23 The scoping report makes reference to the East of England Plan. However, it should be noted that this plan was revoked by the Secretary of State on 6 July 2010.
- 3.24 Each of the specialist topics are considered in turn below. It should be noted that the general points made above and elsewhere in this opinion are not repeated under each of the specialist topics. However the applicant should ensure that such issues are addressed fully before the ES is submitted to the Commission. Consideration should also be given to the scoping responses, copies of which are provided in Appendix 2.

Air Quality and Climate Change (section 4.4 of the scoping report)

- 3.25 The air quality assessment should be carried out in accordance with the requirements of the relevant district, borough and county councils and utilising the most up-to-date information. Of particular note in this regard is Ipswich Borough Council's intention to declare a new Air Quality Management Area (AQMA) which will need to be taken into account when undertaking the assessment.
- 3.26 The air quality assessment should consider likely operational emissions from the proposed development and demonstrate that health-based air quality standards will not be exceeded.

- 3.27 The assessment should take account of the emissions from the proposed developments itself as well as the traffic assessment and also provide information to inform the ecological assessments.
- 3.28 Air quality and dust levels should be considered not only on site but also off site, including along access roads and local footpaths.
- 3.29 Consideration should be given to appropriate mitigation measures and to monitoring dust complaints.

Noise and Vibration (section 4.5 of the scoping report)

- 3.30 The Commission recommends that the methodology and choice of noise receptors should be agreed with the Environmental Health Department(s) of the relevant Council(s), English Heritage (where relevant) and with the Environment Agency. The requirements of Suffolk County Council, Ipswich Borough Council and Babergh District Council are particularly important in this regard.
- 3.31 Operational noise impacts, including the potential for noise squeal on the curved chord, should be assessed. Particular attention should be given to the quieter night-time period in this regard.
- 3.32 Noise impacts on people should be specifically addressed (both during construction and operation), and particularly any potential noise disturbance at night and other unsocial hours such as weekends and public holidays.
- 3.33 Information should be provided on the types of vehicles and also on the type of plant to be used during the construction phase. Once operational, noise sources should be identified and measures identified to mitigate noise nuisance.
- 3.34 The assessment should take account of the traffic assessment and consider noise and vibration impacts along access routes, especially during the construction phase. The noise and vibration assessment should also provide information to inform the ecological assessments.
- 3.35 Consideration should be given to monitoring noise complaints.

Townscape and Visual Amenity (section 4.6 of the scoping report)

- 3.36 The Commission draws the attention of the applicant of the need to take account of any changes to relevant legislation and guidance, in particular the need to reference PPS 5 (rather than PPGs 15 and 16).
- 3.37 The Commission advises that the ES should describe the model used for the townscape and visual assessment; provide information on the

area covered and the timing of any survey work and describe the methodology used. The Commission recommends that the location of viewpoints should be agreed with the local authorities and that these should include views of the proposed development from the public footpath alongside the River Gipping.

- 3.38 The assessment should identify landscape character types, any protected landscapes, such as Areas of Outstanding Natural Beauty (AONB), areas of special landscape value and important landscape features that may be affected by the proposed development.
- 3.39 The proposal includes provision for a bridge over the River Gipping. The Commission requests that careful consideration should be given to the form, siting and use of materials and colours in terms of minimising the adverse visual impact of this structure.
- 3.40 The applicant should identify and mitigate the landscape impact of the development, especially in relation to residential receptors. With regard to mitigation measures, the Applicant may wish to consider the comments made by Suffolk County Council regarding publicly accessible natural green space.

Ecology (section 4.7 of the scoping report)

- 3.41 The Commission recommends that surveys should be thorough, up to date and take account of other development proposed in the vicinity.
- 3.42 The Commission recommends that the proposals should address fully the needs of protecting and enhancing biodiversity. The assessment should cover habitats, species and processes within the site and surroundings. The Commission draws attention in particular, but not exclusively, to the effects on otter, water vole, reptiles and bats.
- 3.43 The ecological assessment should consider likely impacts on the Stour and Orwell Estuary, Special Protection Area and Ramsar site and the Orwell Estuary Site of Special Scientific Interest (SSSI) both of which are located downstream of the reach of the River Gipping which borders the site. Impacts on the River Gipping County Wildlife Site (CWS) and the Alderman Canal CWS should also be assessed.
- 3.44 In order to assess whether or not the proposed development will have a significant effect on the Stour and Orwell Estuary, Special Protection Area and Ramsar site, the ecological assessment needs to provide further information, amongst other matters, on the following issues:
- likely changes to water quality and water flow to the estuary;  
and

- likely impacts on bird species which are a notified feature of the SPA/Ramsar site.
- 3.45 The Commission also notes the possible need for an Appropriate Assessment in view of the proposed development site's location in relation to the Stour and Orwell Estuary, Special Protection Area and Ramsar site (see section 4 of this opinion in relation to Appropriate Assessment).
- 3.46 The ecological assessment should take account of noise and vibration and air quality (dust) impacts and cross reference should be made to these specialist reports.
- 3.47 The operational and decommissioning phases of the project should be addressed. The Commission recommends the need to consider cumulative and combined impacts and advises this is particularly relevant in terms of assessing the impacts on ecology.
- 3.48 Historic data should be obtained from Suffolk Biological Records Centre (SBRC) to inform any further species survey, including notable plants and invertebrates. In addition, any protected and Biodiversity Action Plan species on or adjacent to the site which may be affected by the proposed development should have up-to-date survey information.
- 3.49 The River Gipping is an important wildlife corridor and, wherever possible this feature should be enhanced. If there is likely to be an increase in lighting during the construction and/or operation of the chord and associated/ancillary structures, then surveys for bats and otter along the River Gipping corridor should be carried out.
- 3.50 The ES should identify likely impacts in relation to protected species and propose suitable mitigation measures which address these. Otter and water vole are likely to be prominent in the riparian habitats. Given the presence of reptiles on the site a mitigation strategy will be required and, through consultation with relevant statutory authorities, consideration should be given to a new compensation habitat being provided in advance of development commencing.

#### Geology, Soils and Contaminated Land (section 4.8 of the scoping report)

- 3.51 The Commission recommends that the potential impacts on the contamination of land and groundwater arising from the import of the material used to create the proposed railway embankments should be included in the geology and soils and contaminated land assessment. Similarly, impacts which may result from temporarily stockpiling bulk fill material should also be addressed. The Applicant may wish to consider the adoption and implementation of a suitable site waste management plan as one means of mitigation for these potential impacts.

Water Quality, Hydrology and Hydrogeology (section 4.9 of the scoping report)

- 3.52 The Commission welcomes the provision of a flood risk assessment for the proposed railway chord. As noted above, if the flood risk assessment is a separate document, sufficient information regarding this issue should be included in the environmental assessment so that the ES remains a stand-alone document. Alternatively, the flood risk assessment could form a suitably referenced appendix to the ES.
- 3.53 Any assessment of flood risk should take into account the comments received on the proposal from the Environment Agency as detailed in Appendix 2. Further, it should be noted that Ipswich Borough Council has undertaken a more up-to-date strategic flood risk assessment (SFRA) than that quoted in the scoping report (see Ipswich Borough Council's website at: <http://www.ipswich.gov.uk>).
- 3.54 The Commission recommends that the flood risk assessment should consider the proposal's ability to adapt to future climate change projections for the UK as detailed in UKCP09 at <http://ukclimateprojections-ui.defra.gov.uk>.
- 3.55 The Applicant's attention is drawn to the comments of Anglian Water (see Appendix 2) regarding the proximity of the proposed development to the company's sewers. Further consultation with the water company will be required to ensure that the proposed works do not adversely impact the public sewer network in this area.
- 3.56 The Commission recommends that the sections considering the water environment should be cross referenced.
- 3.57 3.56 The Commission advises that the EIA should consider any likely significant water pollution impacts of the proposed development and that suitable mitigation measures should be proposed to address these. Reference should be made to any relevant guidance such as PPS 23: 'Planning and Pollution Control'. On-going monitoring should also be addressed and agreed with the relevant authorities to ensure that any mitigation measures are effective.

Archaeology and Cultural Heritage (section 4.10 of the scoping report)

- 3.58 The setting of cultural heritage resources could be affected; this includes historic buildings, historic landscapes and archaeological sites and the Commission considers that these should be addressed in the ES. Cross reference should be made to the townscape and visual amenity section of the ES.
- 3.59 The Applicant's attention is drawn to the comments made by English Heritage (Appendix 2) with regard to the scope, method and data

required to ensure that this assessment is completed acceptably. The Conservation Team of Suffolk County Council's Archaeological Service should also be consulted on these issues.

Traffic and Transport (section 4.11 of the scoping report)

- 3.60 The traffic and transport study should take account of the operational and decommissioning phases of the proposed railway chord as well as the construction phase. The comments made by East Cambridgeshire District Council and Cambridge County Council (see Appendix 2) regarding the likely impacts of the operational phase of this development are important with respect to this issue.
- 3.61 Transport of the bulk fill material and waste stored temporarily on site should be addressed in terms of the form of transport and the possible routing. All licences relating to the extraction, movement and temporary storage of waste material should be arranged with the appropriate regulatory authority.
- 3.62 The Commission recommends that the ES should take account of the location of public rights of way (PROW), including footpaths, bridleways and byways and should clearly set out impacts on them, including within the wider area. It is important to minimise hindrance to them where possible. The assessment should take account of construction and operational phase disruption to walking and cycling routes in the development area, particularly those alongside the River Gipping.
- 3.63 Mitigation measures should be considered such as a travel plan and sourcing materials so as to minimise transport. Mitigation measures to avoid disruption to walking and cycling routes may also be required.

Socio-economic (section 4.12 of the scoping report)

- 3.64 The Commission recommends that the assessment criteria should be locationally specific and consider the potential significance of the impacts of the proposal within the local and regional context.
- 3.65 The socio-economic study should take account of the comments made by the East of England Development Agency (EEDA) as detailed in Appendix 2.

Sustainability (section 4.13 of the scoping report)

- 3.66 As noted above, if the sustainability statement is a separate document, sufficient information regarding this issue should be included in the environmental assessment so that the ES remains a stand-alone document. Alternatively, the statement could form a suitably referenced appendix to the ES.

Cumulative Effects (section 4.14 of the scoping report)

- 3.67 Particular note of the comments of East Cambridgeshire District Council (see Appendix 2) should be taken with regard to the potential cumulative impacts of the proposed railway chord.
- 3.68 The Commission recommends that combined impacts should be considered and not just cumulative impacts (see Appendix 3 of this opinion).

Waste

- 3.69 The Commission considers it essential to also take account of materials to be removed from the site and to identify where potential traffic movements would be routed.
- 3.70 The Commission advises that the ES should clarify the types of all wastes to be processed and that the effect of the proposal, in terms of waste, should be included in the ES.

## **4.0 OTHER INFORMATION**

### **Appropriate Assessment**

- 4.1 The Applicant's attention is drawn to the (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP) and the need to include information identifying European sites to which the Habitats Regulations applies or any Ramsar site which may be affected by a proposal. The information to be submitted should be sufficient for the Commission to make an appropriate assessment of the implications for the site if required by regulation 48(1).
- 4.2 The report to be submitted under Reg 5(2)(g) of the APFP with the application must deal with two issues. The first is to enable a formal assessment by the competent authority, of whether there is likely significant effect and the second, should it be required, is to enable the carrying out of an appropriate assessment by the competent authority.
- 4.3 Further information with regard to the Habitats Assessment process is located within the pre-application IPC Guidance Note 2 available via the Commission's website.

### **Health Impact Assessment**

- 4.4 The Commission agrees with the Health Protection Agency that the proposal could have potential health impacts and that the ES should therefore provide an analysis of these impacts.
- 4.5 The attention of the Applicant is particularly drawn to the need to assess the possible impacts of electromagnetic fields on human health as detailed by the Health Protection Agency in Appendix 2.
- 4.6 The Commission considers that it would be a matter for the applicant to decide whether or not to submit a stand-alone Health Impact Assessment (HIA) and that an applicant should have particular regard to the responses received from the relevant consultees regarding health. The methodology for the HIA, if prepared, should be agreed with the relevant statutory consultees and take into account mitigation measures for acute risks.

## **Applicant's Consultation**

- 4.7 It is recommended that the applicant provides preliminary environmental information<sup>1</sup> to the local authority when presenting it with the draft Statement of Community Consultation (SoCC) for comment under s47 of the Planning Act 2008.
- 4.8 Consultation with the local community should be carried out in accordance with the SoCC which will state how the applicant intends to consult on the preliminary environmental information. Where consultation responses have resulted in important changes affecting the EIA, such comments could usefully be reported and considered. This reporting could also assist the applicant in the preparation of its consultation report required to be submitted with the application for development consent.

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<sup>1</sup> For an explanation see under 'Interpretation' in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI2263

## **APPENDIX 1**

### **LIST OF CONSULTATION BODIES FORMALLY CONSULTED DURING THE SCOPING EXERCISE**



## APPENDIX 1

### LIST OF CONSULTATION BODIES FORMALLY CONSULTED DURING THE SCOPING EXERCISE

<b>Consultee</b>	<b>Organisation</b>
The Relevant Regional Planning Body	East of England Regional Strategy Board
The Health and Safety Executive	Health and Safety Executive
The Relevant Strategic Health Authority	East of England Strategic Health Authority
Natural England	Natural England HQ Natural England East of England
The Historic Buildings and Monuments Commission for England	English Heritage English Heritage East of England
The Relevant Fire and Rescue Authority	Suffolk Fire & Rescue Service Headquarters
The Relevant Police Authority	Suffolk Constabulary
The Relevant Parish Council(s) or Relevant Community Council	Copdock and Washbrook Parish Council Sproughton Parish Council Pinewood Parish Council Bramford Parish Council Claydon and Whitton Parish Council Burstall Parish Council Wherstead Parish Council
The Environment Agency	The Environment Agency The Environment Agency – Eastern Regional Office
The Equality and Human Rights Commission	Equality and Human Rights Commission
The Commission for Architecture and The Built Environment	CABE Design Review
The Relevant Regional Development Agency	East of England Regional Development Agency
The Equality and Human Rights Commission	Equality and Human Rights Commission

The Commission for Sustainable Development	Sustainable Development Commission
The Homes and Communities Agency	The Homes and Communities Agency
The Commission for Rural Communities	The Commission for Rural Communities
The Civil Aviation Authority	The Civil Aviation Authority
The Relevant Highways Authority	Suffolk County Council
The Rail Passengers Council	Rail Passenger Council
The Disabled Persons Transport Advisory Committee	The Disabled Persons Transport Advisory Committee
The Coal Authority	The Coal Authority
The Office Of Rail Regulation	The Office Of Rail Regulation
Approved Operator	Network Rail Infrastructure Ltd Network Rail (CTRL) Ltd
The Gas and Electricity Markets Authority	OFGEM
The Water Services Regulation Authority	OFWAT
The Relevant Waste Regulation Authority	Suffolk County Council
Relevant Internal Drainage Boards	Burnt Fen IDB Mildenhall IDB Lakenheath IDB East Harling IDB Southery and District IDB Waveney, Lower Yare and Lothingland East Suffolk IDB
The British Waterways Board	The British Waterways Board
The Health Protection Agency	HPA
The Relevant Local Resilience forum	Suffolk Resilience Forum
<b>Relevant Statutory Undertakers</b>	
Health Bodies under the Acquisition of Land Act 1981 s.16	Ipswich Hospital NHS Trust East of England Ambulance Service NHS Trust Suffolk Mental Health Partnership

	NHS Trust Suffolk PCT
Electricity Distributors With CPO Powers	ECG (Distribution) Limited EDF Energy (IDNO) Limited EDF Energy Networks (EPN) Plc Energetics Electricity Limited ESP Electricity Limited Independent Power Networks Limited The Electricity Network Company Limited
Electricity Transmitters With CPO Powers	National Grid
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En Route plc
Public Gas Transporter	British Gas Pipelines Limited Energetics Electricity Limited Energetics Gas Limited ES Pipelines Ltd ESP Connections Ltd ESP Networks Ltd ESP Pipelines Ltd Fulcrum Pipelines Limited Fulcrum GTC Pipelines Limited Energy House Independent Pipelines Limited Intoto Utilities Limited National Grid Gas Plc (NTS) National Grid Gas Plc (RDN) Northern Gas Networks Limited Quadrant Pipelines Limited Scotland Gas Networks Plc Southern Gas Networks Plc SP Gas Limited SSE Pipelines Ltd The Gas Transportation Company Limited Utility Grid Installations Limited Wales and West Utilities Ltd
Water and Sewage Undertakers	Anglian Water
Universal Service Provider	Royal Mail Group
Railways	BRB Residuary Limited Network Rail (CTRL) Ltd (Duplicate) Network Rail Infrastructure Ltd (Duplicate)

Water Transport	ABP Ipswich
<b>Local Authorities (s.43)</b>	
	<p>The Broads Authority          Ipswich Borough Council          Suffolk Coastal District Council          Babergh District Council          Mid Suffolk District Council          Suffolk County Council          Norfolk County Council          Cambridgeshire County Council          Essex County Council          Waveney District Council          South Norfolk District          Breckland District          Borough Council of Kings Lynn and          West Norfolk          East Cambridgeshire Council          South Cambridgeshire District          Council          Braintree District Council          Colchester Borough Council          Tendring District Council          Forest District Heath Council          St Edmundsbury District          Great Yarmouth Borough Council</p>

## **APPENDIX 2**

### **LIST OF BODIES WHO REPLIED BY [26 MAY 2010] AND COPIES OF REPLIES**



## APPENDIX 2

### LIST OF BODIES WHO REPLIED BY 24 August 2010

Anglian Water
Associated British Ports
Babergh District Council
CABE
Cambridgeshire County Council
Civil Aviation Authority
E S Pipelines Ltd
East Cambridgeshire District Council
East of England Development Agency
Fulcrum Pipelines Limited
Health and Safety Executive
Health Protection Agency
Homes and Communities Agency
Network Rail
Norfolk County Council
South Norfolk Council
St Edmundsbury Borough Council
Suffolk Coastal District Council
The Broads Authority
The Coal Authority
The Crown Estate
The Environment Agency
Transport for London
Waveney District Council



**From:** [Huke Lisa](#)  
**To:** [IPC Scoping Opinion](#);  
**Subject:** Proposed Ipswich Chord Development - Network Rail - Your Ref 100727\_TR040002\_170183  
**Date:** 06 August 2010 09:16:10

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To whom it may concern, I would advise that Anglian Water have public sewers in very close proximity to the proposals and we would wish to be further consulted in respect of the exact nature of the works and more detailed proposals.

Should you have any further queries, please do not hesitate to contact me.

Kind Regards,

**Lisa Huke**  
**Anglian Water Services Ltd**  
**Developer Services**  
**01206 289328**

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\*\*\*\*\*





ASSOCIATED  
BRITISH PORTS  
EAST ANGLIA

06 August 2010

AMF/hd/268  
Your Ref: 100727\_TR040002\_170183

IPSWICH  
KING'S LYNN  
LOWESTOFT

www.abports.co.uk

IPG

09 AUG 2010

REF:

Mr Simon Butler  
EIA & Land Rights Manager  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Briston  
BS1 6PN

Dear Sir

**Proposed Ipswich Chord Development ("the Project")  
Proposal By Network Rail (the Applicant")  
Infrastructure Planning (Environmental Impact Assessment)  
Regulations 2009 SI 2263 ("the EIA Regulations")**

I refer to your correspondence regarding the above dated 27<sup>th</sup> July 2010. I have been in correspondence with Network Rail in relation to the above project and my concerns regarding the construction works of the proposed scheme and the proposed Chord, having an impact on rail operations at the Port of Ipswich.

Network Rail confirmed on the 30<sup>th</sup> July 2010 that the construction works of the proposed scheme and the proposed Chord will have no impact on the rail operations at Associated British Ports, Ipswich.

This was our primary concern with regard to the development.

I attach for ease of reference, correspondence on the matter.

Notwithstanding this issue, I do not believe that ABP Ipswich have any further comments regarding information that should be provided in forthcoming environmental statement.

Kind regards

Yours sincerely

**Alastair MacFarlane**  
Port Manager  
East Anglia

Email cc Andrew Garner  
Nick Ridehalgh  
Martin O' Hara  
Peter Beckett

IPSWICH  
OLD CUSTOM HOUSE  
KEY STREET  
IPSWICH  
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LOWESTOFT  
NORTH QUAY CARGO TERMINAL  
COMMERCIAL ROAD  
LOWESTOFT  
SUFFOLK NR32 2TE  
TEL: +44 (0)1502 516804  
FAX: +44 (0)1502 500032







2004-2005  
Supporting People  
2006-2007  
Waste and Recycling  
2006-2007  
Culture and Sport for  
Hard to Reach Groups

**Nicholas Ward BA (Hons) MSc MRTPI**  
**Chief Planning Control Officer**  
**Babergh District Council**  
Corks Lane, Hadleigh, Ipswich IP7 6SJ

**DX NO: 85055 Exchange: Babergh**  
**Main Switchboard: 01473 822801**  
**Website: www.babergh.gov.uk**

**Infrastructure Planning Commission**  
**Temple Quay House**  
**Temple Quay**  
**Bristol**  
**BS1 6PN**

Your Ref: 100727-TR040002-170183  
My Ref:  
Please ask for: Mr Ward  
Direct Line: 01473 825858  
Fax: 01473 825708  
Email: [nick.ward@babergh.gov.uk](mailto:nick.ward@babergh.gov.uk)

**IPC**

**19 AUG 2010**

**REF:**

18 August 2010

Dear Mr Butler

- 1. INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS, 2009**
- 2. PROPOSED IPSWICH CHORD DEVELOPMENT BY NETWORK RAIL**

Thank you for your letter dated 27 July informing the District Council of the proposed development as an adjoining local authority within the meaning of Section 43 of the Planning Act, 2008.

Having reviewed the scoping report provided by the applicants the District Council does not consider there are any additional subjects that should be addressed within the Environmental Statement.

I would, however, point out that the scoping report makes reference to the East of England Plan which was revoked by the Secretary of State on 6 July.

Yours sincerely

**N J Ward**  
Chief Planning Control Officer





03 August 2010

Simon Butler  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

IPC

04 AUG 2010

REF:



Our ref: CSE-20521

Dear Simon Butler

**INFRASTRUCTURE PLANNING COMMISSION: PROPOSED IPSWICH CHORD  
DEVELOPMENT  
PLANNING APPLICATION REFERENCE: 100727\_TR040002\_170183**

Thank you for consulting the Commission for Architecture and the Built Environment (CABE) about this proposal.

We do not wish to comment on the proposed Ipswich Chord development.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Rutherwood'. The signature is fluid and cursive, with the first name 'Clare' being more prominent.

Clare Rutherwood  
Design Review assistant



My ref:  
Your ref: 100727\_TR040002\_170183  
Date: 24 August 2010  
Contact: Sinéad O Donoghue  
Direct dial: 01223 703552  
E Mail: Sinead.O'Donoghue@cambridgeshire.gov.uk



Simon Butler  
EIA and Land Rights Manager  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

**Environment Services**  
Acting Executive Director John Onslow

**Development Strategy Team**  
Box No. CC1216  
Castle Court  
Castle Hill  
Cambridge  
CB3 0AP

Dear Simon,

### **Proposed Ipswich Chord Development – Scoping Opinion**

Thank you for the opportunity to provide informal comments on the information to be provided in the Environmental Statement relating to the proposed Ipswich Chord Development by Network Rail.

The following response has been prepared by Cambridgeshire County Council officers. The Council recognises that the scheme was deemed to satisfy the strategic requirements of the Freight Capacity Enhancement Project.

#### **Planning and Policy Context**

It should be noted that the East of England Plan has been revoked as of 6 July 2010 and no longer forms part of the planning and policy context. Regard should be had to Saved Policies from relevant Structure Plans.

#### **Waste Management Plan**

Under 3.1 Key Construction Activities and Likely Environmental Impacts, we would suggest that waste management be included as a key activity; therefore an appropriate waste management plan should be offered.

#### **Traffic and Transport**

We have noted as per 4.11.1 that an initial meeting with the Local Highways Authority will take place to discuss the capacity of the local network. We reserve the right to make further comments, particularly as haulage via the A14, or equally the use of the adjacent rail depot, may prove difficult and there may be consequential impacts on the road or rail infrastructure within adjoining authorities.



I hope that these comments are helpful in developing the Ipswich Chord Environmental Statement. If you have any questions relating to this officer response, please do not hesitate to contact me.

Yours sincerely,



Adrian Tofts  
Development Strategy Manager

## Directorate of Airspace Policy

Mr Simon Butler (via e-mail)  
Infrastructure Planning Commission

2 August 2010

Ref ERM/DAP/Planning/IpswichChord  
Your Ref 100727\_TR040002\_170511 dated 27 June 2010

Dear Mr Butler

### **Proposed Ipswich Rail Chord – Scoping Opinion Comment**

Thank you for your recent correspondence relating to the subject development. You sought related Civil Aviation Authority (CAA) scoping comment.

Whilst I can find no indication of the height of any element of the proposed development, it is assumed that it would not exceed 50 feet above ground level. On that basis, whilst I must concede that, given the development appears to be an 1100m stretch of railway line I am surprised that the IPC felt that civil aviation regulatory input was necessary, I trust the following brief comment is useful.

Notwithstanding the future need for the relevant planning authority to consult in line with ODPM / Department for Transport Circular 1/2003 to identify any aerodrome safeguarding issues, I would suggest that any associated environmental assessment might consider whether the height of any part of the proposed development would impact upon operations associated with any local aerodrome or emergency services air support units.

Yours sincerely

*{original signed}*

Mark Smailes  
Off Route Airspace 5

#### **Civil Aviation Authority**

CAA House 45-59 Kingsway London WC2B 6TE [www.caa.co.uk](http://www.caa.co.uk)  
Telephone 020 7453 6545 Fax 020 453 6565 [marks.smailes@caa.co.uk](mailto:marks.smailes@caa.co.uk)



**From:** [IPC Enquiries](#)  
**To:** [IPC Scoping Opinion;](#)  
**Subject:** FW: Environmental Impact Assessment, Proposed Ipswich Chord Development  
**Date:** 29 July 2010 11:23:58

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**From:** Alan Slee [mailto:[alans@espipelines.com](mailto:alans@espipelines.com)]  
**Sent:** Thursday, July 29, 2010 10:28 AM  
**To:** IPC Enquiries  
**Subject:** Environmental Impact Assessment, Proposed Ipswich Chord Development

Dear Simon,

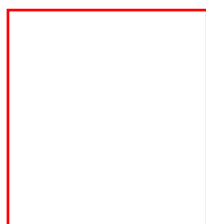
**100727\_TR040002\_170183**  
**Environmental Impact Assessment, Proposed Ipswich Chord Development (614264, 244951: IP2 OUB).**

Further to your communication to E S Pipelines Ltd, ESP Networks Ltd, ESP Electricity Ltd, ESP Pipelines Ltd and ESP Connections Ltd dated 27 July 2010 I can confirm that our businesses have no comments at this stage.

Regards,

**Alan Slee**  
Operations Manager

DD 01372 227567  
Mobile 07766 802070  
Fax 01372 386203



Hazeldean,  
Station Road,  
Leatherhead  
KT22 7AA  
( 01372 227560 2 01372 377996

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## **East Cambridgeshire District Council.**

Your Ref 100727\_TR040002\_170183.

### **Response to Infrastructure Planning Commission consultation on the scoping opinion requested by Network Rail for the project; IPSWICH CHORD DEVELOPMENT.**

East Cambridgeshire District Council is fully in support of the transfer of freight from road to rail and is therefore very supportive of measures to enable this. However, we have serious concerns about the impact on the level crossing on the A142 adjacent to Ely station, and on diversionary routes that may come into use for vehicles if delays in Ely become significant.

This application cannot be assessed without considering the cumulative effect of the development. The construction of the Bacon Factory Curve is part of the work to upgrade the Felixstowe to Nuneaton Strategic Rail Freight cross-country route from Felixstowe to Nuneaton. The next stage is to construct two "loops" at Ely to hold freight trains and to improve the flow of rail traffic through the junctions at Ely. The purpose of this work is to reduce the number of freight trains travelling on the busy main line to London, and to encompass the expansion of the Haven Ports. The cumulative effect will be to increase the number and length of freight trains using the cross-country route up to a projected 56 trains a day by 2030. The building of the Bacon Factory Curve and the Ely loops needs to be considered in this context and should not be viewed in isolation.

The scoping report is lacking in a number of areas.

#### **Geographical extent of the effects**

The scoping report sets out in Figure 1 of Appendix A, the location of the indicative study area that will be the basis of the report. This is very focussed on the development site and fails to take into account the fact that the project will have further reaching impacts. In particular this authority is concerned about the impact the increase in freight traffic will have as a result of the increased time the level crossing barriers will be down. These effects include the impact on the transport network around Ely; the increase in emissions from stationary vehicles; the increase in vibration and effect on nearby historic buildings; the effect on adjacent SSSI.

#### **Relevant Plans and Policies**

The report should include reference to the ECDC Core Strategy 2009 and The Ely Master Plan as these outline the anticipated growth in Ely, which could be affected by the development.

#### **Cumulative impacts**

This project is part of a wider initiative for increasing capacity for freight paths from the port of Felixstowe, and is part of a Strategic Freight Network

Programme. The report states that a key part of this is the up-grading of the cross country route from Felixstowe to Nuneaton via Ely, Peterborough and Leicester. However, in discussing the cumulative effects there is little mention of the other projects involved in increasing freight capacity along this line.

It is vital that the cumulative effects of these projects are considered in the Environmental Statement in order to fully consider the environmental effects arising from the increased time which the level crossing barrier would be down on the A142 in Ely.

One specific project that must be considered is the construction of two freight loops here at Ely, which will help get the freight trains through the various junctions more easily. It is possible that this project will be carried out as permitted development. However, its cumulative effects must be considered in this Environmental Statement. The IPC should also point out at this stage that, if the freight loops were also to give rise to significant environmental effects so that the project were EIA development, it could not be constructed under permitted development rights.

The aim is to have this work finished in 2014, and this is the point at which the number of freight trains on the cross country route between Felixstowe and the rest of the country will start to increase. Network Rail are predicting 56 trains a day on the cross country route by 2030 (up from 28). This does not include other freight train movements or passenger trains through Ely. At the moment there is an average of 265 trains a day over the level crossing on weekdays, 66 of which are freight trains. Increasing this by a further 28 freight trains would certainly have a significant impact.

### **Traffic and Transport**

Table 3B indicates that there would be no adverse effects on traffic and transport. This fails to consider the impacts on the A142 in Ely and the surrounding area. Depending on the increase in freight movement this project would result in this could have a significant impact.

Part II of Schedule 4 of the EIA Regs states that '*the data required to identify and assess the measures the main effects which the development is likely to have on the environment*', is required to form part of the Environmental Statement. In order to fully assess the impact on traffic and transport around Ely, base-line information in relation to current train movements and the length of time the barrier is currently down would be required.

Technically, increasing the number of freight trains should take some of the lorries off the road, thus reducing the problem at the crossing, but some survey work that Atkins did for the county in 2002, shows that a significant number of the lorries using the crossing are local, rather than coming from Felixstowe. Therefore, this would not necessarily be the case for Ely.

The main transport issue is the inevitable increase in congestion due to the crossing being shut for longer periods. In addition to this is the impact of bridge strikes, when everything has to go over the crossing while the underpass is closed. These currently average 15 a year, costing Network Rail around £100,000 per annum. It is not just lorries that have to queue. Vehicles that are too high to use the underpass include buses, coaches, minibuses, fire engines and ambulances as well as a high proportion of light goods' vehicles (LGVs). The impact on buses means that the Ely/Soham/Newmarket/Cambridge bus service is frequently unreliable, making it unattractive to users, impacting on the sustainable transport network.

Mike Hatfield of MDS Transmodel has produced a report looking at freight growth (both road and rail) and is estimating that by 2030, the level crossing could be closed to road traffic for up to 52 minutes in the hour. This is based on the additional freight trains, plus additional passenger trains to Norwich and Ipswich. Mike has based this on rail industry regulations and a 3 hour survey of the barriers that he did himself. As a result of his survey, we know now that the crossing is currently closed for up to 36 minutes in the hour. We are however, hoping to carry out more comprehensive monitoring of our own in September and October. This monitoring will include queue lengths and a break down of vehicle types.

The effect of existing and additional barrier closures may well impact on other roads (e.g. A1123 between Stretham and Soham) where goods vehicles may take diversionary routes. The effect on villages along these roads should be assessed.

### **Emissions and air quality**

Increased queuing of vehicles will lead to an increase in emissions from exhaust fumes with localised air quality issues. This issue would need to be assessed taking into account the baseline situation and the likely impact of the project (in accumulation with other projects to increase freight capacity on this line).

### **Socio-economic impacts**

For Ely to grow sustainably, there is an imperative to encourage sustainable transport links between the estates, the city centre and the rail station. Exacerbating an existing problem would make this very difficult.

In summary, ECDC would consider the scoping report is deficient in the areas listed above. In order to produce a compliant Environmental Statement, the scope would have to be widened.

Should you require any further information, do please contact either Penny Mills or Alan Dover on Tel. 01353 665555 or e-mail [penny.mills@eastcambs.gov.uk](mailto:penny.mills@eastcambs.gov.uk) or [alan.dover@eastcambs.gov.uk](mailto:alan.dover@eastcambs.gov.uk)



Reply to: Juliet Richardson  
Direct dial: 01223 484632  
Email: julietrichardson@eeda.org.uk  
Your ref: 100727\_TR040002\_170183

Mr S Butler  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

23 August 2010

Dear Mr Butler

### **Ipswich Chord Development - Environmental Statement (Regulations 2009 SI 2263)**

I write in response to your consultation on the scope of the Environmental Statement dated 27<sup>th</sup> July 2010. Thank you for consulting the East of England Development Agency (EEDA).

EEDA's principal role is to improve the region's economic performance. Our main focus when preparing a response to a scoping opinion is to ensure that information submitted with the application provides the evidence and analysis required to demonstrate the broader impact upon sustainable economic development and regeneration in the East of England.

Others will no doubt wish to comment on the other dimensions of the proposal. It is within this context that our response should be considered.

### **Introduction**

EEDA is responsible for taking forward measures to enhance sustainable economic growth in the East of England. With regard to transport, EEDA's task is to ensure that the development of transport networks and systems in the East of England maximises sustainable economic growth. This is addressed by EEDA in three ways:

- By the development of sound economic evidence to identify transport priorities;
- By influencing key decisions on regional transport; and

- By directing its own resources into transport where market failure has prevented investment taking place.

In preparing the Environmental Statement (ES), Network Rail should ensure that the evidence, intelligence and research that EEDA has completed with partners in the region both informs the scope and content of the ES and forms a key part of the evidence base for the submission.

## **Background**

The Port of Felixstowe is the largest container port in the UK, handling over 3 million TEUs and having about 40% of the UK container market – the port's success is a national concern as well as local. Going forward, competition in the port sector is expected to intensify with more capacity coming on stream and shipping lines aggressively pursuing cost reduction strategies and exercising greater commercial bargaining power. Supporting the port's competitiveness is important in the national and regional interest.

In order to cope with the extra demand for rail freight to and from the port, the cross country rail route between Felixstowe and Nuneaton must be upgraded, both by gauge enhancement and capacity increase. This would unlock more paths on the rail network and reduce congestion on the road network. The Felixstowe to Nuneaton rail link is comprised of 3 key sections:

- Felixstowe Branch Line (Felixstowe to Ipswich) Section
- Peterborough to Nuneaton Gauge Enhancement
- Ipswich to Nuneaton Capacity Enhancement - This scheme includes the Ipswich to Peterborough Line and the current application for work at Bacon Factory Chord / Ipswich yard.

EEDA has identified the upgrading of the Felixstowe to Nuneaton rail route as a key transport priority for the East of England to support sustainable freight movements, and has undertaken the following actions in support of the route's development:

- EEDA supported the Peterborough to Nuneaton gauge enhancement scheme in the East of England's 2006 initial advice to Government on the region's priorities for funding from the Department for Transport's 'Transport Innovation Fund'
- EEDA led a 3-way RDA contribution of £1m to Network Rail for the completion of the work required to advance the Peterborough to Nuneaton gauge scheme to GRIP 4.
- EEDA Chair (at the time), Richard Ellis, visited Brussels in summer 2009 to meet the EC commissioner and lobby for the scheme to receive TEN-T funding.

In response to a recent informal consultation conducted by Network Rail (regarding options for the use of some additional TEN-T funding that was allocated to the Felixstowe to Nuneaton route in 2009), EEDA supported the development and twin-tracking of the Ipswich Bacon Factory Curve as

our preferred option, as this scheme was able to demonstrate it would secure most economic return amongst the five options considered.

EEDA therefore strongly supports Network Rail's objective to proceed quickly with development work on the Ipswich Bacon Factory Curve twin-tracking rail scheme, as part of the overall Felixstowe to Nuneaton rail corridor enhancements. We have outlined below our suggestions for the evidence required in the Environmental Statement.

## Evidence

In 2008, EEDA published the East of England Transport Economic Evidence Study (TEES), which used DfT compliant modelling techniques to identify how transport constraints are impacting on the regional economy. Furthermore, the study identified key locations and corridors for future prioritisation and quantified the economic benefits of taking action to address constraints in these locations. TEES identified the Felixstowe to Peterborough cross-country rail line / A14 corridor as a key priority for future investment to alleviate productivity constraints.

The TEES identified a range of economic impacts resulting from the development of transport interventions, which Network Rail should consider quantifying in the ES for this scheme. Although the economic appraisal of transport schemes is a complex area, in very broad terms it is possible to identify two categories of economic benefit; these can be thought of as '**conventional benefits**' (or direct benefits) and '**wider benefits**':

- Conventional benefits can be thought of as those which benefit direct users of the scheme. This typically includes travel time and operational cost savings; in addition accident savings can also be monetised and are given an economic value.
- Wider economic benefits are those economic benefits that are not captured in the conventional appraisal of transport schemes, but have been proven to exist. This was recognised in work led by Sir Rod Eddington on behalf of DfT and Treasury on transport's role in sustaining UK productivity and competitiveness. The key wider impacts to consider are:
  - Agglomeration impacts: The increase in productivity that arises from increased clustering of, and interactions between, firms that result from a transport improvement.
  - Impacts of imperfect competition: The additional benefits of increasing economic activity in real (imperfect) markets which exceed the benefits estimated for increasing activity in theoretically perfect markets (which exactly match the additional costs of increasing activity). Research suggests that the additional benefit associated with this effect can be estimated as 10% of business traveller's user benefits.
  - Labour market effects: The additional government tax receipts due to changes in labour market choices that occur as a result of the changes in transport costs and options caused

by the scheme. The key effect considered is a potential increase in the labour market participation.

The identification of the impacts above should be undertaken on a basis that allows geographical allocation of any potential economic benefits arising from the Ipswich scheme. As the TEES identified, the alleviation of transport constraints in one area can have an economic benefit in locations hundreds of miles away. In this instance, due to the long-distance nature of freight journeys with origins or destinations at Haven Gateway ports and passing through Ipswich, it is very likely that economic benefits from this particular rail scheme will be realised as far afield as the Midlands, London and North-West.

In addition to TEES, other EEDA and regional transport evidence development has identified impacts that should be quantified in the Environmental Statement for this scheme:

- **Further rail-specific economic impacts** – The work undertaken by Network Rail for the ‘Peterborough to Nuneaton Gauge Enhancement’ Transport Innovation Fund bid in 2006 identified further rail-specific economic impacts to those outlined above. Specifically these included:
  - Consumer surplus arising from haulage cost savings by choosing rail over road;
  - The business impacts arising from the reduction in road congestion measured by Sensitive Lorry Miles (SLMs) and rail business passengers who were previously road users;
  - The business impacts arising from any additional passenger services;
  - Increasing network resilience which result in operational and maintenance cost savings to Network Rail;
  - Economies of scale for the FOCs arising from greater traffic using rail from Felixstowe.
- **Carbon reduction impacts** – The EEDA Transport Carbon Study (TRACS) quantified the increase in carbon emissions projected for the East of England. The results demonstrated an increase in overall emissions of approximately 33% between now and 2031. In view of the national legally binding Climate Change Act target of an 80% reduction in greenhouse gas emissions by 2050 (compared to 1990 levels), we would encourage Network Rail to consider the carbon emission impacts of this scheme, and the economic value of these using the shadow price of carbon. This analysis should consider the potential carbon impact of reduced road freight movements due to increased rail capacity.
- **Employment** – Whilst the development of the Ipswich scheme by itself may not have significant employment impacts, the full development of the Felixstowe to Nuneaton rail route will be of a sufficient scale to support additional employment. The Haven Gateway Partnership Economic Impacts of Ports and Logistics Report confirms that the transport, logistics and wholesale trades businesses play a pivotal role in the economy of the sub region and their presence sustains around 45,000 jobs in the sectors and supporting services. In addition the partnerships

Employment Land Review highlights the need to support 30,000 net new jobs between 2001 and 2021. Economic forecasts suggest that this is a challenging target but that key drivers such as the ports and other key interventions could offer the prospect of additional growth to meet the target. The analysis should consider the impact upon wider employment rates.

- **Sensitivity testing with and without A14 improvements** – The A14 Ellington to Fen Ditton Highways Agency scheme would significantly increase highway capacity on the A14 between Cambridge and the A1. Funding for this scheme is currently being reviewed by the Department for Transport as part of the Comprehensive Spending Review. It would be useful for a sensitivity test to take place to determine the impact of the A14 scheme on the economic benefits of the Ipswich rail scheme. Without the A14, more emphasis will be placed on rail for freight movements, potentially enhancing the economic benefits that the Ipswich scheme could provide.

The full TEES and TRACS reports are available at <http://www.eeda.org.uk/transport>

### **Summary of suggested scoping report requirements**

To summarise the comments above, EEDA fully supports the development of this scheme. In our experience, evidence usually provides only limited reference to the ‘socio-economic’ impacts of the proposed development. EEDA considers that, given the scale of the proposed development the report should identify:

- the need for the development scheme
- the wider socio-economic benefits and costs (including an analysis of additionality – the added value generated by the scheme, taking account value that would have happened without the scheme), and
- an analysis of alternative options.

It will help in this respect if appropriate links are made to the Regional Economic Strategy (RES), EEDA research and analysis and evidence prepared by sub regional partners in the Haven Gateway. In this context the impacts of the development on the following headline regional ambitions are likely to be particularly significant and we request that, where appropriate, they are considered in the ES:

- **Productivity and prosperity**
  - Annual growth in real workplace-based GVA over 2008 – 2031
  - Per capita at 2.3 per cent
  - Per worker at 2.1 per cent
- **Conventional economic impacts (GDP £)**

- **Wider economic impacts** (all GDP £)
  - Agglomeration
  - Imperfect competition
  - Labour market impacts
- **Further rail-specific economic impacts** (all GDP £)
- **Sensitivity testing with and without A14 Ellington to Fen Ditton Improvements.**
- **Consumer surplus arising from haulage cost savings by choosing rail over road.**
  - Sensitive Lorry Miles (SLMs)
  - Any impacts on passenger services;
  - Increasing network resilience which result in operational and maintenance cost savings to Network Rail.
  - Economies of scale for the FOCs arising from greater traffic using rail from Felixstowe.
- **Employment**

Employment rate by 2031

  - Working-age population at 80 per cent
  - 16–74 population at 70 per cent
- **Skills**

Share of working-age population with qualifications by 2020 (aged 19 to state pension age)

  - NVQ level 2 or equivalent qualification and above 90 per cent
  - NVQ level 3 or equivalent qualification and above 68 per cent
  - NVQ level 4 or equivalent qualification and above 40 per cent
- **Inequality**

Earnings

  - Level of lower-quartile to average incomes by 2031 at 60 per cent
- **Greenhouse gases**
  - Carbon reduction benefits (CO2 reduction and £ value of reduction)
  - End-user-attributed CO2 emissions by 2031
  - Reduction on 1990 baseline level by 60 per cent
- **Water resources**

Household per capita consumption of water

  - Reduction on 2008 baseline level by 2030 by 20 per cent
  - Per capita consumption in 2030 by 120 litres per head per day
- **Strategic ambitions identified in the Regional Economic Strategy**

- expand the international port functions of Haven Gateway, including expansions at Felixstowe South and Bathside Bay
- carry out major reinvention of city and town centres including Ipswich
- develop cultural infrastructure of national and regional significance at DanceEast as part of the Cranfield Mill development in Ipswich
- improve capacity and address constraints on strategic road and rail routes connecting the Haven Gateway to national markets, including the Felixstowe-Nuneaton rail route, Great Eastern main line, A12, A120 and A14
- preserve and enhance the sub-region's landscape and biodiversity
- continue to develop University Campus Suffolk as a driver of a highly skilled workforce and applied research in the sub-region.

As outlined earlier, it is important that these impacts are identified at local, regional and national levels, to ensure that potential impacts of this scheme throughout the country are all accounted for.

### **Land Interest Issues**

In addition to the issues discussed above, Network Rail should also be aware that EEDA has a land interest in the form of a charge on the part of the site known as the Harris Business Park, off Hadleigh Road, Ipswich. In disposing of this site in 2008, EEDA protected the route and allowed the sympathetic development of the remainder of the site. The business park, formerly the home of the Harris bacon factory, is Ipswich's largest remaining undeveloped industrial site. In time it is set to provide 300,000sq ft of work related buildings for industrial, warehousing, commercial and manufacturing use. The site is being developed by Peter Colby Commercials Ltd, who acquired the site from EEDA. Planning permission for this development was granted on 5<sup>th</sup> March 2009 (reference IP/08/00970/FUL). EEDA is due to be abolished by March 2012. therefore this interest in the site will have to transfer to another public body when a successor in title is identified (expected October 2011).

If you would like any further information regarding the content of this letter, please don't hesitate to contact me

Yours sincerely



**Natalie Blaken**  
**Head of Planning**



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IPG

30 JUL 2010

REF:



Your Reference: 100727\_TR040002\_170183  
Our Ref: n/a

29<sup>th</sup> July 2010

Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Dear Sir/Madam

**RE: Proposed Ipswich Chord Development**  
**Grid Ref: 614200/245200**

Thank you for your request for information about Fulcrum Pipelines Limited's pipes and equipment.

We can confirm that Fulcrum Pipelines Limited do not currently have any existing pipes or equipment on or around the above site address.

Please note that other Gas Transporters may have plant in this locality which could be affected by your proposed works.

If you have any future requests for information about our plant, please email these to us at [FPLplantprotection@fulcrum.co.uk](mailto:FPLplantprotection@fulcrum.co.uk).

If you have any queries regarding this letter, please contact your Fulcrum Advisor, Rebecca Smith on 01709 845535, who will be happy to help.

Yours faithfully

A handwritten signature in black ink, appearing to read "Ian Foster".

**Ian Foster**  
Head of Asset



Chief Scientific Adviser's Group  
Building 3.3  
Redgrave Court  
Merton Road  
Bootle  
Merseyside  
L20 7HS

Your ref:  
100727-TRO40002-170183

HSE: email:  
[NSIP.applications@hse.gsi.gov.uk](mailto:NSIP.applications@hse.gsi.gov.uk)

Mrs! Sheila Twidle  
EIA & Land Rights Advisor  
Infrastructure Planning Commission (IPC)  
Temple Quay House``  
Temple Quay  
Bristol  
BS1 6PN

**17<sup>th</sup> August 2010**

Dear Mrs Twidle

**PROPOSED IPSWICH CHORD DEVELOPMENT (“the project”)  
PROPOSAL BY NETWORK RAIL (“the applicant”)  
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2010 SI 2263 (“the EIA Regulations”)**

Thank you for your letter of 27th July 2010 regarding the information to be provided in an environmental statement relating to the above project.

There is little for HSE to comment on at this stage however, there are some observations that it would seem sensible to pass on to Network Rail.

**Major hazards sites and explosives sites within the vicinity of the proposed development**

**Explosives sites**

A check has been made on the locations of licensed explosives sites in relation to the proposed Rail Chord at Ipswich. On the basis of the information provided, there are no HSE-licensed explosives sites which might impact on this development.

## **Major Hazard Sites**

HSE has taken the opportunity to check its records to establish whether the proposed development would fall within HSE's consultation distance (CD) for a major hazard installation or pipeline. Our records show that the proposed Ipswich Chord enhancement falls within the following HSE land use planning (LUP) consultation distances:

- National Grid PLC, Hadleigh Road, Ipswich  
Potential rail track and storage development within Inner, Middle and Outer zones.
- British Oxygen Co. Ltd, Hadleigh Road, Ipswich  
Potential rail track development within Outer zone.

This means that HSE must be consulted on the applications in order that it can provide its LUP advice.

The planning application falls within the consultation distances of the above sites. As there is minimal risk due to the nature of the proposed development. Hse's codified advice (PADHI+) would produce a "Do Not Advise Against" response to this pre-planning enquiry.

As this advice is based on a number of assumptions which if incorrect could affect HSE's advice, the promoter should contact HSE to clarify the position as part of the S42 consultation.

## **Hazardous Substances Consent**

Any site needing to store or use hazardous substances at or above specific quantities must Hazardous Substances Consent (HSC) from the Hazardous Substances Authority (HSA), in accordance with the Planning (Hazardous Substances) (Amendment) (England) Regulations 2009. In this particular case, the HSA would be Ipswich Borough Council.

There is insufficient information on the report provided to advise whether HSC would be required for this site, therefore the promoter will need to check if any of the named substances in Part A of the Schedule to the Regulations will be present at or above the specified controlled quantities. If so, the promoter will need to apply for HSC. In many cases, the substances present may not be included in Part A; but they may fall within one or more of the categories of substances & preparations specified in Part B of the Regulations. If that is the case and they are present at or above the controlled quantity, then again the promoter would need to obtain HSC.

HSC might also be required for the presence of hazardous substances even though the amount present is below the controlled quantity. This may happen because substances within the same generic category that have similar hazard characteristics would be added together to determine whether consent is required for some or all of them.

## **Electrical Safety**

The projects may involve connections to the electrical power distribution systems or have an impact on existing generation, transmission and distribution assets. In the light of that HSE offers the following comments. As well as satisfying general UK health and safety legislation (i.e. Health and Safety at Work etc Act 1974 and supporting regulations), the proposed design and future operations must comply with the Electrical Safety, Quality and Continuity Regulations 2002, as amended. Generators, distributors, their contractors and others have defined duties in order to protect members of the public from the dangers posed by the electrical equipment used. HSE enforces the safety aspects of these regulations. If you have any doubts about the particular application of these regulations in terms of either the operation or construction of substations, overhead lines or underground cables, please contact Mr J C Steed, Principal Specialist Inspector (Electrical Networks), either at [john.steed@hse.gsi.gov.uk](mailto:john.steed@hse.gsi.gov.uk) or Rose Court GSW, 2 Southwark Bridge Road, London SE1 9HS.

I hope this is useful. HSE looks forward to receiving the formal s42 consultation from the promoter in due course when the plans are sufficiently developed.

Please note any further electronic communication on this project can be sent direct to the HSE designated e-mail account for NSIP applications the details of which can be found at the top of this letter. Alternatively hard copy correspondence should be sent to Miss Vilja Gatrell at:

4S3 Redgrave Court,  
Merton Road,  
Bootle  
Merseyside  
L20 7HS  
Tel; 0151 951 4607

Yours sincerely

Penny Taylor  
Risk Communications Policy Unit





FAO Simon Butler  
Infrastructure Planning Commission  
[ipcscopingopinion@infrastructure.gsi.gov.uk](mailto:ipcscopingopinion@infrastructure.gsi.gov.uk)

Health Protection Agency  
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[www.hpa.org.uk/IPC](http://www.hpa.org.uk/IPC)

13<sup>th</sup> August 2010

Your Ref: 100727\_TR040002\_170183  
Our Ref: TR\_RA\_100728\_0052

Dear Simon,

#### **Proposed Ipswich Chord Development**

##### **Background**

Network Rail has asked the Infrastructure Planning Commission (IPC) for its opinion ("scoping opinion") on the information to be provided in an environmental statement relating to a proposal for a proposed 1,100m chord line linking the Great Eastern Norwich Main lines with the Lowestoft and Felixstowe branch lines to the North of Ipswich. The request for a scoping opinion is a precursor to an intensive and detailed independent assessment of the environmental impact of the proposed development.

The HPA is a statutory consultee at the pre-application and application stages for nationally significant infrastructure projects (NSIP) "which are likely to involve chemicals, poisons or radiation which could potentially cause harm to people."<sup>1</sup> For those NSIP applications subject to Environmental Impact Assessment (EIA) the HPA is a consultation body under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.

The IPC must therefore consult the HPA on the information that the HPA considers should be provided in the environmental statement (or confirm that the HPA has no comments) before the IPC adopts its scoping opinion.

The HPA's enclosed response focuses on health protection issues relating to chemicals and radiation. The scope of the HPA's response does not extend to wider health; these fall under the remit of other stakeholders. The following document outlines the information that the HPA considers should be provided in the environmental statement. The advice offered by the HPA is impartial and independent.

<sup>1</sup> Cited in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

## HPA recommendations regarding the scoping document

### General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA<sup>2</sup>. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the new development. Assessment should consider the development, operational, and decommissioning phases.

The applicant should ensure that the EIA contains sufficient information for relevant authorities to be able to fully assess the potential impact of the development on public health. The HPA strongly recommends that a separate section be included in the environmental statement summarising the impact of the proposed development on public health: summarising risk assessments, proposed mitigation measures, and residual impacts. This section should include any information relating to health contained in other sections of the application (e.g. air quality, emissions to water, etc). Compliance with National Policy Statements' requirements and with relevant guidance and standards should be highlighted. The document should be reviewed by the IPC to ensure that the application is of sufficient quality to be submitted for consultation. The HPA considers that the onus should be on the applicant to gather and clearly present the information required and requested by statutory consultees and that it should not be the role of statutory consultees to undertake these assessments on the applicant's behalf. An expectation that statutory consultees will undertake these assessments is unrealistic; this would pose significant resource implications and would conflict with the consultee's position as an impartial and independent body.

Within the EIA the HPA would expect to see information about how the applicant would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The following comments cover a range of issues that the HPA would expect to be addressed by the applicant. However this list is not exhaustive and the onus is on the applicant to ensure that the relevant public health issues have been identified and addressed.

### Impacts arising from construction

It is recommended that any assessment of impacts arising from emissions due to construction considers potential impacts on all receptors and describes monitoring and mitigation during the construction phase. Construction will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the applicant to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The applicant should ensure that there are robust mechanisms in place to respond to any complaints of traffic related pollution, during both construction and operation of the facility.

<sup>2</sup> Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper, 2006; Department for Communities and Local Government. Available from:

<http://www.communities.gov.uk/archived/publications/planningandbuilding/environmentalimpactassessment>

**Emissions to air**

There are unlikely to be significant air quality impacts arising from development which employs Best Available Techniques (BAT) and which meets regulatory requirements concerning emission limits and design parameters. However, the EIA should provide a comprehensive assessment of potential impacts.

The EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that health-based air quality standards will not be exceeded due to emissions arising as a result of construction activities or rail traffic, once the development is complete.

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

**Emissions to water**

The EIA should include assessment of potential impacts on human health arising from any emissions to surface or ground-water i.e. any emissions that may occur as a result of construction activities or rail traffic, once the development is complete.

**Emissions to ground****Existing and future contaminated land issues**

We would expect the applicant to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with contaminated land and/or the migration of material off-site should be assessed and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with land contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

**Waste**

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the development, likely to be primarily during the construction phase, the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated.

### **Electromagnetic fields**

There is a potential health impact associated with the electric and magnetic fields around substations and the connecting cables or lines. The following information provides a framework for considering the potential health impact.

The HPA recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP) on limiting public exposure to electromagnetic fields:

<http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

The ICNIRP guidelines are based on the avoidance of known adverse effects of exposure to electromagnetic fields (EMF) at frequencies up to 300 GHz (gigahertz), which includes 50 Hz electric and magnetic fields associated with electricity transmission. Further clarification on advice on exposure guidelines for 50 Hz electric and magnetic fields is provided in the following note on the HPA website:

[http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb\\_C/1195733805036](http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb_C/1195733805036)

HPA notes the current Government policy is that the ICNIRP guidelines are implemented in line with the terms of the European Recommendation:

[http://www.dh.gov.uk/en/PublicHealth/Healthprotection/DH\\_4089500](http://www.dh.gov.uk/en/PublicHealth/Healthprotection/DH_4089500)

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. It was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE) was then set up to take this recommendation forward, explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government. In the First Interim Assessment of the Group, consideration was given to mitigation options such as the 'corridor option' near power lines, and optimal phasing to reduce electric and magnetic fields:

<http://sagedialogue.org.uk/> (go to "Document Index" and Scroll to SAGE/Formal reports with recommendations)

SAGE has published a Second Interim Assessment which addresses electricity distribution systems up to 66 kV, and the report can also be found at the above link.

The Agency has given advice to Health Ministers on the First Interim Assessment of SAGE regarding precautionary approaches to ELF EMFs and specifically regarding power lines and property, wiring and electrical equipment in homes:

[http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb\\_C/1204276682532?p=1207897920036](http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb_C/1204276682532?p=1207897920036)

The evidence to date suggests that in general there are no adverse effects on the health of the population of the UK caused by exposure to ELF EMFs below the guideline levels. The scientific evidence, as reviewed by HPA, supports the view that precautionary measures should address solely the possible association with childhood leukaemia and not other more speculative health effects. The measures should be proportionate in that overall benefits outweigh the fiscal and social costs, have a convincing evidence base to show that they will be successful in reducing exposure, and be effective in providing reassurance to the public.

The Government response to the SAGE report is given in the written Ministerial Statement by Gillian Merron, the Minister of State, Department of Health, published on 16<sup>th</sup> October 2009:

<http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm091016/wmstext/91016m0001.htm>

The HPA considers that the onus is on the applicant to conduct the assessment of compliance with the above advice and policy, and to gather and present the information clearly, leaving no additional analysis necessary on the part of the HPA. The assessment should be clearly laid out, either as an identified section of a report which can be read in isolation or as a separate report. Compliance with the ICNIRP guidelines should be highlighted. If it is considered not practicable for compliance to be achieved at all locations accessible to the public, the report should provide a clear justification for this. The report should include an appropriate risk assessment showing that consideration has been given to mitigation measures for acute risks. In relation to possible long-term health effects and precaution, the report should include a summary of compliance with HPA advice and Government policy.

**Liaison with other stakeholders, comments should be sought from:**

- the local authority for matters relating to noise, odour, vermin and dust nuisance
- the local authority regarding any site investigation and subsequent construction (and remediation) proposals to ensure that the site could not be determined as 'contaminated land' under Part 2A of the Environmental Protection Act
- the Food Standards Agency for matters relating to the impact on human health of pollutants deposited on land used for growing food/ crops
- the Environment Agency for matters relating to flood risk and releases with the potential to impact on controlled waters

Yours sincerely



Mary Morrey  
Deputy Director, CRCE

[CRCE.IPCConsultations@HPA.org.uk](mailto:CRCE.IPCConsultations@HPA.org.uk)



**From:** [Nick Enge](#)  
**To:** [IPC Scoping Opinion](#)  
**Subject:** Response to consultation request  
**Date:** 09 August 2010 14:22:12  
**Attachments:** [DOC001.PDF](#)

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Dear Sirs

Following your request to respond to the attached letter, I write to confirm that the Homes and Communities Agency do not wish to make a comment in this instance.

Yours sincerely

**Nick Enge MRICS**  
**Investment and Regeneration Manager**  
**Tel: 01223 374045**  
**Mob: 07818 421 550**

Homes and Communities Agency  
Block 2, Suite 3. Westbrook Centre  
Milton Road  
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Homes and Communities Agency

110 Buckingham Palace Road, London SW1W 9SA

Arpley House, 110 Birchwood Boulevard, Warrington WA3 7QH

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0300 1234 500

[mail@homesandcommunities.co.uk](mailto:mail@homesandcommunities.co.uk)

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# Network Rail



FAO Simon Butler  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

IPC

16 AUG 2010

1 Eversholt Street  
Euston Square  
London NW1 2EE  
From: David Moss  
Tel: 0207 904 7301  
Tel m: 07733 127 037  
Email: [david.j.moss@networkrail.co.uk](mailto:david.j.moss@networkrail.co.uk)

Your ref: 100727\_TR040002\_170183  
My ref. ES/ESO/lpswich

REF: \_\_\_\_\_

Date: 12 August 2010

Dear Mr Butler

**Re: Proposed Ipswich Chord Development for Network Rail – application for Environmental Scoping Opinion.**

I refer to your letter of the 27 July 2010 concerning the above matter. I can confirm that as the promoter of this proposal Network Rail has worked closely with its consultants, Jacobs, in preparing the environmental scoping report. Network Rail is satisfied that all the aspects of the environment likely to be significantly affected by the development have been identified in the scoping report along with suitable methodologies for assessing the significance of that impact.

Yours sincerely

David Moss  
Senior Town Planner - Major Projects



**From:** [Cumming, David](#)  
**To:** [IPC Scoping Opinion](#)  
**Subject:** Ipswich Chord Environmental Scoping Report  
**Date:** 20 August 2010 10:17:10

---

Dear Sir

**Proposed Ipswich Chord Development  
Proposal by Network Rail  
Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 SI 2263**

Thank you for your letter of 27 July 2010 (your ref 100727\_TR040002\_170183).

Norfolk County Council supports the strategic aims of the project. However, it does not have any comments on the Environmental Scoping Report.

David

**David Cumming**  
**Principal Transport Planner**  
Environment, Transport and Development  
Direct dial telephone number: 01603 224225  
E-mail: [david.cumming@norfolk.gov.uk](mailto:david.cumming@norfolk.gov.uk)  
**Norfolk County Council**  
General enquiries: 0344 800 8020 or [information@norfolk.gov.uk](mailto:information@norfolk.gov.uk)  
[www.norfolk.gov.uk](http://www.norfolk.gov.uk)

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IPC

17 AUG 2010

REF:



Simon Butler  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

South Norfolk House  
Swan Lane  
Long Stratton  
NORWICH  
NR15 2XE

Tel 01508 533814  
Fax 01508 533625  
pwhitham@s-norfolk.gov.uk

Our Ref: ENQ2010/1984  
Your Ref: 100727\_TR040002\_170183

12 August 2010

Dear Mr Butler

**Proposed Ipswich Chord Development  
By Network Rail**

Thank you for your letter dated 27 July 2010 regarding the above project and your consultation under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.

Having considered the information submitted with the request, I can confirm that I have no comments to raise.

Yours sincerely

A handwritten signature in black ink, appearing to read "P. Whitham", with a long horizontal flourish extending to the right.

**Paul Whitham  
Development Control Manager  
Planning, Housing & the Built Environment**

---

[www.south-norfolk.gov.uk](http://www.south-norfolk.gov.uk)

DX 130080 Long Stratton 2  
Textphone 01508 533622  
Emergency out of hours service 01508 533633  
Freephone 0808 168 2000 (Main Number)





**From:** [Pannell, Gemma](#)  
**To:** [IPC Scoping Opinion](#)  
**Subject:** 100727\_TR040002\_170183 - Proposed Ipswich Chord Development by Network Rail  
**Date:** 29 July 2010 11:49:50

---

Dear Mr. Butler,

Thank you for your letter dated 27th July 2010 consulting us on the scoping report for the above mentioned project. However we consider that we have been identified as a consultation body in error as the development is neither within our administrative boundary nor do we border the site.

We would consider that the relevant Local Authorities are Ipswich Borough Council, Babergh District Council and possibly Mid Suffolk District Council whom would be a neighbouring authority.

I trust this information is of assistance.

**Gemma Pannell**  
**Senior Planning Officer**  
**01284 757494**  
**St Edmundsbury Borough Council, West Suffolk House**  
**Western Way, Bury St Edmunds IP33 3YU.**

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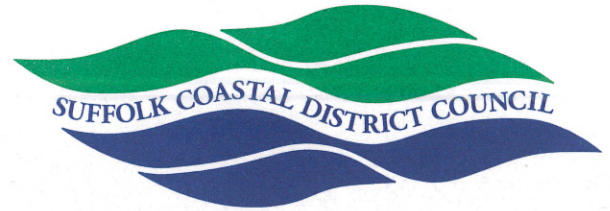
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# Suffolk Coastal District Council

Melton Hill, Woodbridge, Suffolk IP12 1AU  
Tel: (01394) 383789  
Fax: (01394) 385100  
Minicom: (01394) 444211  
DX: Woodbridge 41400  
Website: [www.suffolkcoastal.gov.uk](http://www.suffolkcoastal.gov.uk)



Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

IP C

09 AUG 2010

REF: \_\_\_\_\_

Please ask for: Paul Coffey  
Direct Dial: (01394) 444417  
E-mail address: [paul.coffey@suffolkcoastal.gov.uk](mailto:paul.coffey@suffolkcoastal.gov.uk)  
Our Ref: PNC/18.2 and C10/0544  
Your Ref: 100727\_TR040002\_170183

For the attention of Simon Butler

2 August 2010

Dear Sir

## **PROPOSED IPSWICH CHORD DEVELOPMENT BY NETWORK RAIL INFRASTRUCTURE PLANNING (EIA) REGULATIONS 2009**

Thank you for your letter dated 27 July 2010.

The application site lies outside the jurisdiction of Suffolk Coastal District Council. However, the proposed development may have implications for the transportation of freight to and from the Port of Felixstowe both during the construction phase and during the operational phase. The scoping report produced by Jacobs does not appear to cover these potential impacts.

The District Council would anticipate that in the operational phase the project would have positive environmental impacts through the increased capacity for transportation of freight by rail and the consequent reduction in transportation of freight by road.

Yours faithfully

For Head of Planning Services



INVESTOR IN PEOPLE

Suffolk Coastal... *where quality of life counts*



IPSWICH



**Broads Authority**

The Broads - a member of the National Park family

Dragonfly House 2 Gilders Way  
Norwich Norfolk NR31UB

**Telephone** (01603) 610734

**Fax** (01603) 756069

**Email** [broads@broads-authority.gov.uk](mailto:broads@broads-authority.gov.uk)  
[www.broads-authority.gov.uk](http://www.broads-authority.gov.uk)

**IPC**

**12 AUG 2010**

**REF:**

Mr Simon Butler  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Ms Cally Smith  
Head of Development and  
Regeneration  
01603 756029  
[cally.smith@broads-authority.gov.uk](mailto:cally.smith@broads-authority.gov.uk)

Date 10 August 2010

Our ref

Your ref

Dear Mr Butler

**Your reference:** 100727\_TR040002\_170183  
**My reference:** BA/2010/0263/SCOPE

Further to the consultation dated 27 July in respect of the above Scoping Opinion, I can confirm that the Broads Authority area is not affected by the proposals and accordingly the Broads Authority has no comments to make.

Yours sincerely

Cally Smith  
Head of Development and Regeneration



Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.coal.gov.uk/services/planning](http://www.coal.gov.uk/services/planning)

Simon Butler – EIA and Land Rights Manager  
Infrastructure Planning Commission

[By Email: [ipcscopingopinion@infrastructure.gsi.gov.uk](mailto:ipcscopingopinion@infrastructure.gsi.gov.uk)]

03 August 2010

For the Attention of: Simon Butler

Dear Simon

**Scoping Opinion: 100727 TR040002 170183**

### **Proposed Ipswich Chord Development**

Thank you for your consultation letter of the 27 July 2010 seeking the views of The Coal Authority on the above planning application.

I have reviewed the proposals and confirm that The Coal Authority has no observations or specific comments.

Yours sincerely



**Miss Rachael A. Bust** *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MIPSM, MRTPI*  
**Deputy Head of Planning and Local Authority Liaison**



Infrastructure Planning Commission  
**Attention: Simon Butler**  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Dr Tim Norman  
Senior Planning Manager  
Tel: 020 7851 5045  
Fax: 020 7851 5125  
E-mail: tim.norman@thecrownestate.co.uk

02 August 2010

Dear Mr Butler

**PROPOSED IPSWICH CHORD DEVELOPMENT**  
**NETWORK RAIL**

Reference is made to your letter dated 27 July 2010 inviting The Crown Estate to comment on the scoping report.

I can advise that, in this instance, The Crown Estate has no comments on the scoping report for this proposal.

Should you have any queries or require any additional information with regard to this matter, please do not hesitate to contact me on 0207 851 5045.

Yours sincerely,



**Dr Tim Norman**  
Senior Planning Manager



Mr S Butler  
Infrastructure Planning Commission  
Temple Quay House  
2 The Square Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** AE/2010/111109/01-L01  
**Your ref:** 100727\_TRQ40002\_170183  
**Date:** 13 August 2010

Dear Mr Butler

**PROPOSED IPSWICH CHORD DEVELOPMENT IPSWICH MARSHALLING  
YARD HARRIS SITE**

We refer to your EIA Scoping Opinion consultation letter of 27 July 2010 about the above proposed development.

**Environment Agency position**

We have reviewed the scoping report submitted which is relatively extensive in its coverage. However, we have further comments on specific significant issues to make in respect of flood risk management, including our flood defence structures, and land contamination, to ensure that the Environmental Statement will appropriately address the environmental issues we consider are of most importance for this proposal. We have also taken the opportunity to provide guidance on bridge design and an informative on the proposal for the benefit of the applicant.

**Flood Risk**

The following comments are made in relation to Jacobs' Environmental Scoping Report dated May 2010.

Part of the proposed development lies within Flood Zones 2 and 3. Flood Zone 3a is defined from Table D.1 in Annex D to Planning Policy Statement 25 (PPS25) 'Development and Flood Risk' as High Probability. This zone comprises land assessed as having a 1 in 100 year or greater annual probability of flooding from fluvial rivers (1%) in any year. Developments in this zone are required to contain a Flood Risk Assessment (FRA) in accordance with the requirements of PPS25.

Environment Agency  
Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD.  
Customer services line: 08708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

Cont/d..

A FRA will be required to support the Environmental Statement that is to be submitted with the planning application.

### *Embankment*

Part of the proposed scheme is to place an embankment on the triangular section of land, where the former bacon factory lies. Within the Flood Risk Assessment we will want to see how this embankment will affect the floodplain. There is a small section of Flood Zone 2 and 3 in this area. An assessment into the potential loss of floodplain storage, affect on flows and whether the embankment will increase the flood risk elsewhere will have to be conducted.

The proposed development must not reduce the net volume of compensatory flood plain storage. Any increase in the amount of hardstanding area produced by the proposed development must be mitigated for.

Any hardstanding that is situated within the 1 in 100 year plus climate change flood envelope will be susceptible to compensatory storage.

The proposed embankment may also impact upon existing surface water flow routes. An assessment into the current surface water arrangements and characteristics will have to be undertaken. If the proposed embankment was to affect potential surface water depths, flow routes – appropriate mitigation measures will have to be proposed.

**N.B.** Ipswich Borough Council has undertaken a more up-to- date SFRA that was quoted within the submitted information. This document can be found on Ipswich Borough Council's website at: <http://www.ipswich.gov.uk>

### *Impact on Environment Agency Structures*

The proposed crossing over the River Gipping is in very close proximity to Environment Agency flood defence structures at the Norwich Line Sluice. The proposed works could have a significant impact on our structures. We have already held preliminary discussions on this issue, in particular whether there is some scope to reduce the bridge aperture to a certain extent but it will need a meeting between us and Network Rail to sort out in more detail exactly what can be achieved. An internal meeting to discuss the situation is to be held on 17 August 2010, which is the deadline for responding to this scoping opinion request. Rather than hold up this response, we will advise you further on the outcome of this meeting if anything of significance emerges from this internal discussion.

### **Land Contamination**

We refer to the "Environmental Scoping Report", Ref. No: B1469500/ENV/REP/001 Rev. 3, dated May 2010, prepared by Jacobs for the proposed development. The site is located on a Secondary "A" Aquifer overlying a Principal Chalk Aquifer, is within a Groundwater Source Protection Zone (II), and is adjacent to the River Gipping. We therefore consider the environmental sensitivity of controlled waters at this site to be High.

However, it appears the issues of land contamination and any potential risks to controlled waters (Groundwater & Surface Water) associated with the proposed development at this location, and any required mitigation measures, are to be

suitably addressed within the EIA as per section 4.8 “Geology, Soil and Contaminated Land” and 4.9 “Water Quality, Hydrology and Hydrogeology” of the scoping report.

In that regard the information to be provided with the planning application must be sufficient to satisfy the requirements of Planning Policy Statement 23: ‘Planning and Pollution Control’, and with respect to the possible contamination issues associated with the development should provide a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk) and assurance that the risk to controlled waters is fully understood and can be addressed through appropriate measures.

## **Bridge Design**

Within the development proposals it is proposed that a new bridge will cross the river Gipping. The following guidance is given for a new bridge that crosses a main river:

### Soffits

- The soffit should be 600mm above the design flood level in order to allow floating debris to pass freely through.
- The soffit must not be lower than 300mm of the upstream banktops, if a lower soffit is required due to technical grounds a wider span of the bridge maybe required to compensate flow.
- Soffits on navigable rivers will need to allow clearance for boats legally using the river. This will mean consultation with the relevant navigation authority.

### Design Flow

- Designs flows must be based on a 1% annual event with an additional allowance for climate change. New bridges should include a design life that incorporates climate change while other bridges may be assigned a design life of 60 years.
- Long embankments and routes across floodplains can cause greater problems than the bridge itself. If additional flood openings are proposed a physical or detailed computer flow model should be used to identify the optimum number, size and location.
- Bridge failures often occur due to scour so a study will need to be taken by the developer to establish the hydraulic pressures on the bridge.
- Flood velocities should ideally be limited to between 1.5 and 2.0 m s<sup>-1</sup>. If this can not be achieved developers will need to use training walls to design for velocities of up to 3.5 m s<sup>-1</sup>. The developer must include the design for any training walls in their consent application
- Developers need to take account of foreseeable increases in flow within a catchment due to further development and climate change.

### Bridge Span

- Developers must provide clear span bridges as a general rule, though in larger rivers this may not be possible. In such cases, design calculations must confirm the capacity of the bridge is maintained. On rivers where a navigation right exists, there may be issues with proposals for piers in the channel. The developer must consult us and the navigation authority, in such cases.
- If a multiple span design is needed, a single span covering the normal wetted channel with an approach span on each side (a three span bridge) can sometimes be more appropriate than a two span design which requires a central pier located in the channel.

### Afflux

- A new bridge must produce no difference in water levels between the upstream and downstream sides (afflux) since this would increase flood risk upstream of the bridge.

### Inverts

- Soft inverts should be used to help retain the natural river bed. The top of abutment footings of bridges with no solid invert must be set at least 600 mm below the existing bed level.
- Solid inverts must be set at least 600 mm below the existing hard bed level to allow for future re-grading. The void up to the existing bed level must be filled a suitable inert material, commonly a clean local gravel.

### Deck Design

- Service pipes carrying utilities crossing the watercourse must not impinge into the cross section of the bridge opening. It's better to include any necessary pipes in the deck structure, as this allows access to them without disturbing the river. Extra ducts maybe laid into the deck in anticipation of future services being laid.

In any instance it may be prudent for the applicant to contact us early in the design process to ensure that the bridge meets our requirements.

### **Informative - Flood Defence Consent**

Under the terms of the Water Resources Act 1991 and Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of the main river (river Gipping).

Yours sincerely

**Andrew Hunter**  
**Planning Liaison Officer**

Direct dial 01473 706749

**From:** [Wallace Andrew](#)  
**To:** [ipcscopingopinion@infrastructure.gov.uk](mailto:ipcscopingopinion@infrastructure.gov.uk);  
**cc:** [Meeks Richard](#); [Rheinberg Matthew](#);  
**Subject:** Proposed Ipswich Chord Development  
**Date:** 23 August 2010 10:24:10

---

**For the attention of Simon Butler**

**Your ref: 100727\_TRD40002\_170183**

**With Reference to: Proposed Ipswich Chord Development**

Dear Simon,

I am writing in response to the Environmental Scoping Report on the proposed Ipswich Chord development to which you requested comments from my colleague Richard Meeks at London Rail, Transport for London. I am pleased to offer the following comments on the report.

We are pleased that you have recognised the importance of the instatement of the Ipswich Chord to allow freight services which currently travel between East Coast ports and the West Midlands via the North London Line, to travel along a more direct route via Ely, Peterborough and Leicester.

TfL appreciates that as a result of the scheme, there will be environmental impacts on the local area. However we also recommend that you consider the environmental benefits of the scheme to London. Viewing the benefits over a wider geographical area, redirecting freight services via a more direct route to the West Midlands and away from the North London Line will bring localised improvements to air quality and carbon emissions along the north London corridor. Furthermore, the area would also benefit from a reduction in noise and vibration levels as a result of the reduced freight movements.

We hope you find these comments useful. TfL appreciates the opportunity to comment and provide recommendations on the Environmental Scoping Report. Should you have any further questions, please don't hesitate to contact me.

Yours Sincerely,

**Andrew Wallace**

Planner, Network Development Team, TfL London Rail  
1 Butler Place, London, SW1H 0PT

Tel: 020 7126 3055 | Int: 63055

Fax: 020 7126 1751

Email: [andrewwallace@tfl.gov.uk](mailto:andrewwallace@tfl.gov.uk)

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IPC

09 AUG 2010

REF:

Your Ref: 100727\_TR040002\_170183  
Our Ref:  
Contact: Phil Perkin  
Direct Dial: 01502 523073  
e-mail: [philip.perkin@waveney.gov.uk](mailto:philip.perkin@waveney.gov.uk)  
Date: 4<sup>th</sup> August 2010

Simon Butler  
Infrastructure Planning Commission  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Dear Sir / Madam

**PROPOSED IPSWICH CHORD DEVELOPMENT ("the Project")  
PROPOSAL BY NETWORK RAIL ("the Applicant")  
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2009 SI 2263 ("the EIA Regulations")**

Thank you for your letter dated 27<sup>th</sup> July 2010 regarding the above.

I can confirm that Waveney District Council does not have any comments to make.

Yours faithfully

Phil Perkin  
Principal Planning Officer

**Regeneration**

Town Hall, High Street, Lowestoft, Suffolk NR32 1HS  
**Telephone:** 01502 562111 **Fax:** 01502 514617  
DX 41220 Lowestoft **Website:** [www.waveney.gov.uk](http://www.waveney.gov.uk)



## **APPENDIX 3**

### **PRESENTATION OF ENVIRONMENTAL STATEMENT**



## APPENDIX 3

### PRESENTATION OF THE ENVIRONMENTAL STATEMENT

An environmental statement is described under the EIA Regs as a statement:

- ‘(a) that includes such of the information referred to in Part 1 of Schedule 4 as is reasonably required to assess the environmental effects of the development and of any associated development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile; but
- (b) that includes at least the information required in Part 2 of Schedule 4’.

*(EIA Regs regulation 2)*

The EIA Regs Schedule 4, Parts 1 and 2, set out the information for inclusion in an ES. Part 2 sets out the minimum requirements and is included below for reference:

#### Schedule 4 Part 2

- a description of the development comprising information on the site, design and size of the development;
- a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects;
- the data required to identify and assess the main effects which the development is likely to have on the environment;
- an outline of the main alternatives studies by the applicant and an indication of the main reasons for the applicant’s choice, taking into account the environmental effects;
- a non-technical summary of the information provided [*under the four paragraphs above*].

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 SI 2264 set out the requirements for information which must be provided as part of the DCO application. Applicants may also provide any other documents considered necessary to support the application. Information which is not environmental information (this is defined in Regulation 2 of the EIA Regs) need not be replicated or included in the ES.

The Commission advises that the ES should be laid out clearly with a minimum amount of technical terms and should provide a clear objective and realistic description of the likely significant impacts of the proposed development. The information should be presented so as to be comprehensible to the specialist and non-specialist alike.

The Commission recommends that the ES be concise with technical information placed in appendices.

### **ES Indicative Contents**

The Commission emphasises that the ES should be a 'stand alone' document in line with best practice and case law.

Schedule 4 Part 1 of the EIA Regs sets out the aspects of the environment likely to be significantly affected by the development which should include '*in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors*' (paragraph 19).

The content of the ES should include as a minimum those matters set out in Schedule 4 Part 2 of the EIA Regs. This includes the consideration of any 'Alternatives' considered which the Commission recommends could be addressed as a separate chapter in the ES.

Traffic and transport is not specified as a topic for assessment under Schedule 4; although in line with good practice the Commission considers it is an important consideration *per se*, as well as being the source of further impacts in terms of air quality and noise and vibration.

### **Balance**

The Commission recommends that the ES should be balanced, with matters which give rise to a greater number or more significant impacts being given greater prominence. Where few or no impacts are identified, the technical section may be much shorter, with greater use of information in appendices as appropriate.

The Commission considers that the ES should not be a series of disparate reports and stresses the importance of considering combined and cumulative impacts.

### **Physical Scope**

In general the Commission recommends that the physical scope for the EIA should be determined in the light of:

- the nature of the proposal being considered;
- the relevance in terms of the specialist topic;
- the breadth of the topic;
- the physical extent of any surveys or the study area; and
- the potential significant impacts.

Therefore, the Commission recommends that the study area for the EIA should include at least the whole of the application site embracing all offsite development and for certain topics, such as landscape and transport, the study area will need to be wider. The study area for each specialist topic should be clearly defined and determined by establishing the physical extent of the likely impacts in accordance with good practice.

The Commission considers that the study areas should be agreed, wherever possible, with the relevant statutory consultees and local authorities.

### **Temporal Scope**

The assessment should consider:

- environmental impact during construction works;
- environmental impacts on completion/operation of the development;
- environmental impacts a suitable number of years after completion of the development in order to allow for traffic growth or maturing of any landscape proposals; and
- decommissioning.

In terms of decommissioning, the Commission acknowledges that the further into the future any assessment is made, the less reliance may be placed on the outcome. However, the purpose of such a long term assessment is to enable the decommissioning of the works to be taken into account in the design and use of materials such that structures can be taken down with the minimum of disruption, materials can be re-used and the site can be restored or put to a suitable new use. The Commission encourages consideration of such matters in the ES.

The Commission recommends that these matters should be set out clearly in the ES and that the suitable time period for the assessment should be agreed with the relevant statutory consultees.

The Commission considers that the duration of effects should use a standard terminology, which should be defined.

### **Baseline**

The Commission recommends that the baseline should describe the position from which the impacts of the proposed development are measured. The baseline should be chosen carefully and, where possible, be consistent between topics.

The identification of a single baseline is to be welcomed in terms of the approach to the assessment, although the Commission considers that care should be taken to ensure that all the baseline data remains relevant and up to date. The Commission recommends that the baseline environment should

be clearly explained in the ES, including any dates of surveys. Wherever possible the baseline should be agreed with the appropriate consultees.

For each of the environmental topics, the data source(s) for the baseline should be set out together with any survey work undertaken with the dates.

## **Identification of Impacts and Method Statement**

### Legislation and Guidelines

In terms of the EIA methodology, the Commission recommends that reference should be made to best practice and any standards, guidelines and legislation that have been used to inform the assessment. This should include guidelines prepared by relevant professional bodies.

In terms of other regulatory regimes, the Commission recommends that relevant legislation and all permit and licences required should be listed in the ES where relevant to each topic. This information should also be submitted with the application in accordance with the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 SI No. 2264.

In terms of assessing the impacts, the ES should approach all relevant planning and environmental policy – local, regional and national (and where appropriate international) – in a consistent manner.

### Assessment of Effects and Impact Significance

The EIA Regs require the identification of the '*likely significant effects of the development on the environment*' (Schedule 4 Part 1 paragraph 20). Therefore, the Commission considers it is imperative for the ES to define the meaning of 'significant' in the context of each of the specialist topics` and for significant impacts to be clearly identified.

The Commission recommends that the criteria should be set out fully and that the ES should set out clearly the interpretation of 'significant' in terms of each of the EIA topics. Quantitative criteria should be used where available. The Commission considers that this should also apply to the consideration of cumulative impacts and impact interactions.

### Potential Environmental Impacts

The Commission considers these under Section 3: the EIA Topic Areas of this opinion.

### Impact Inter-actions/Combined Impacts

Multiple impacts on the same receptor should be taken into account. These occur where a number of separate impacts, eg. noise and air quality, affect a single receptor such as fauna.

The Commission considers that the combined effects of the development should be assessed and that details should be provided as to how interactions will be assessed in order to address the environmental impacts of the proposal as a whole.

### Cumulative Impacts

The ES should describe the baseline situation and the proposed development within the context of the site and any other proposals in the vicinity.

Other major development in the area should be identified beyond the proposal itself including any associated development. The Commission recommends that this should be identified through consultation with the local planning authorities on the basis of major developments that are:

- built and operational;
- under construction;
- permitted application(s), but not yet implemented;
- submitted application(s) not yet determined, and if permitted would affect the proposed development in the scoping report; and
- identified in the Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that much information on any relevant proposals will be limited.

Details should be provided in the ES, including the types of development, location and key aspects that may affect the EIA and have been taken into account as part of the assessment.

### Associated development

The ES should give equal prominence to any development which is associated with the proposed development site to ensure that all the impacts of the proposals are assessed.

The Commission recommends that the applicant should distinguish between development for which development consent will be sought (whether integral

to this proposed NSIP or as associated development), any works which are ancillary to the proposed development and any other development. This distinction should be made clear in the ES.

### Alternatives

The ES must set out an outline of the main alternatives studied by the applicant and provide an indication of the main reasons for the applicant's choice, taking account of the environmental effect (Schedule 4 part 1 paragraph 18).

Such matters should, where relevant, include, *inter alia*, any alternative design options and any alternative mitigation measures. The justification for the final choice and evolution of the scheme development should be made clear. Where other sites have been considered, the reasons for the final choice should be addressed.

The Commission advises that the ES should give sufficient attention to any alternative forms and locations for the off-site proposals, where appropriate, and justify the needs and choices made in terms of the form of the development proposed and the sites chosen.

### Mitigation Measures

Mitigation measures may fall into certain categories: namely avoid; reduce; compensate or enhance; and should be identified as such in the specialist sections (Schedule 4 part 1 paragraph 21). Mitigation measures should not be developed in isolation as they may be relevant to more than one topic area.

The effectiveness of mitigation should be apparent. Only mitigation measures which are a firm commitment should be taken into account as part of the assessment.

The application itself will need to demonstrate how the mitigation would be delivered, and only mitigation which can be shown to be deliverable should be taken into account as part of the EIA.

It would be helpful if the mitigation measures proposed could be cross referred to specific provisions proposed within the development consent order. This could be achieved by means of describing the mitigation measures proposed either in each of the specialist reports or collating these within a summary section on mitigation.

### **Trans-boundary Effects**

The Commission recommends that consideration should be given in the ES to any likely significant effects on the environment of another Member State of the European Economic Area. In particular, the Commission recommends

consideration should be given to any discharges to the air and sea and to potential impacts on migratory species.

### **Presentation**

The Commission recommends that all paragraphs in the ES should be numbered. This is for ease of reference. Appendices must be clearly referenced, again with all paragraphs numbered. All figures and drawings should be clearly referenced.

### **Cross References and Interactions**

The Commission recommends that all the specialist topics in the ES should include cross-references in the text to other relevant disciplines. Interactions between the specialist topics is essential to the production of a robust assessment, as the ES should not be a collection of separate specialist topics, but a comprehensive assessment of the environmental impacts of the proposal and how these impacts can be mitigated.

As set out in EIA Regs Schedule 4 Part 1 paragraph 23, the ES should include an indication of any technical difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

### **Terminology and Glossary of Technical Terms**

The Commission recommends that a common terminology should be adopted. This will help to ensure consistency and ease of understanding for the decision making process. For example, 'the site' should be defined and used only in terms of this definition so as to avoid confusion with, for example, the wider site area or the surrounding site.

A glossary of technical terms should be included in the ES.

### **Summary Tables**

The Commission recommends that in order to assist the decision making process, the applicant may wish to consider the use of tables to identify and collate the residual impacts after mitigation. This would include the EIA topics, combined and cumulative impacts.

A table setting out the mitigation measures proposed would assist the reader and the Commission recommends that this would also enable the applicant to cross refer mitigation to specific provisions proposed to be included within the draft Order.

The ES should also demonstrate how the assessment has taken account of this Opinion and other responses to consultation. The Commission recommends that this may be most simply expressed in a table.

## **Bibliography**

A bibliography should be included in the ES. The author, date and publication title should be included for all references.

## **Non Technical Summary**

The EIA Regs require a Non Technical Summary (EIA Regs Schedule 4 Part 1 paragraph 22). This should be a summary of the assessment in simple language. It should be supported by appropriate figures, photographs and photomontages.

## **Consultation**

The Commission recommends that any changes to the scheme design in response to consultation should be addressed in the ES.

It is recommended that the applicant provides preliminary environmental information to the relevant local authority(s) when consulting it/them in relation to the draft Statement of Community Consultation (SoCC).

Consultation with the local community should be carried out in accordance with the SoCC which will state how the applicant intends to consult on the preliminary environmental information (this term is defined in the EIA Regs under regulation 2 'Interpretation'). This preliminary information could include results of detailed surveys and recommended mitigation actions. Where effective consultation is carried out in accordance with s47 of the Planning Act, this could usefully assist the applicant in the EIA process – for example the local community may be able to identify possible mitigation measures to address the impacts identified in the preliminary environmental information. Attention is drawn to the duty upon applicants under s50 of the Planning Act to have regard to the guidance on pre-application consultation.

## **Environmental Management**

The Commission advises that it is considered best practice to outline in the ES, the structure of the environmental management and monitoring plan (EMMP) and safety procedures which will be adopted during construction and operation.