

Response of Great Horkesley Parish Council to the Norwich to Tilbury Consultation 2024

Great Horkesley Parish Council remains seriously concerned as to the consultations and as to the proposals consulted upon which we consider will cause significant harm to the Parish, including National Landscape AONB, and the wider area. We accordingly object to the proposals.

Great Horkesley Parish Council has serious concern as to significant deficiencies in the informal consultations carried out by National Grid in 2022 and 2023 and notes that these deficiencies have not been addressed or indeed properly considered and taint this statutory consultation in 2024, which itself is deficient. The route appears to have been pre-selected and a foregone conclusion, and breaches the Gunning Principles. It is not in accordance with the relevant NSP-EN5 as updated (see further below). There has been a lack of transparency and no proper and costed analysis of alternative options. We maintain our view that the consultation should be re-opened and commenced afresh with all options considered, including alternative routes and up to date technologies, specifically including offshore and HDVC underground cables, alongside full costings and impact evaluation, including not only the environmental cost, but the human cost too.

We are further concerned that the proposal has not demonstrated sufficient need. The routing is driven by the location of the EACN at Ardeigh, yet the need for such EACN is in serious doubt given that the relevant windfarms are willing to connect elsewhere via Sealink and given the considerable doubt as to whether the Tarchon interconnector ought to proceed (see further below).

Great Horkesley is a rural parish comprising a village and open farmland, and the Northern part of the parish falls within the Dedham Vale National Landscape (AONB). The surrounding landscape is open to the North, East and West. Most of the parish is atop a plateau, very flat, and at a relative high point topographically (50M above sea level and close to the local 55M peak at Redhouse Farm). There are very few trees and the 50M pylons and associated infrastructure at the sealing end compounds, especially the Eastern compound, will be both prominent and clearly visible for a significant distance, including within the Dedham Vale National Landscape / AONB (see contour maps and viewsheds, attached to our 2023 consultation response). Such will also be visible from the large cluster of historic and listed buildings at very close proximity to the route through the village and from the main road through the village which has open views across fields where the proposed route crosses and from which the infrastructure will be clearly visible.

Great Horkesley Parish Council endorses the view of the OFFSET MPs and Essex, Suffolk, Norfolk Pylons, that a fully integrated offshore route should be properly considered, evaluated, costed, and presented as an option. Such a route has the potential to remove considerable harm from the amenity of this village, the AONB and the surrounding countryside. Further and alternatively, HDVC cabling which is at least

cost-neutral, if not cheaper, ought to be considered for the whole scheme (and route re-evaluated); such causing significantly less harm due to the narrower construction swathe. Newer technologies should be considered and employed where possible.

We also note that undergrounding itself causes significant harm to the amenity and tranquility of the area particularly during its construction, necessitating 120m wide trenches, but also potentially causes lasting damage to the landscape trenched, particularly where the trenching is shallow. The construction trenches, compounds and haul roads are located in extremely close proximity to residences including Grade II and Grade II* listed buildings who will be particularly impacted and at risk of harm from visual blight, noise and vibration.

Failings in respect of Process and Design

The deficiencies which we have previously identified remain unaddressed and you have failed to take account of our previous comments in respect of route and required mitigation.

You have ignored our objections to the manner in which the consultation process is being conducted. You continue to ignore the Gunning Principles, have still produced just one alternative for consultation, and still have not commented on or responded to the matters set out in the Legal Opinions issued by Lord Banner, KC.

In the present consultation, and worryingly in response to many of the matters raised previously and documented in your 'feedback report', you very often state that work '**will** be done' to determine damage (etc) and that you '**will** propose mitigations' where necessary. This dramatically compounds the deficiencies in your process: how can we – or indeed any respondent - be expected fully to comprehend the scale of damage which will be caused and to provide reasoned feedback when you have not in fact supplied any facts capable of such.

Your response to previous comments or questions is very often vacuous or merely states that you do not consider impacts material without providing evidence. That might, of course, be your opinion but the purpose of a consultation is to find out the opinion of others. Your opinion is neither objective nor balanced. Your assessment is faulty, the impacts are dramatically higher than you state.

We certainly do not share your opinion and assess the damage which would be done to our Parish and to the listed buildings within it, as well as to its setting and that of the Dedham Vale of which our Parish forms part, as 'high' and 'significant'.

You have not responded to our questions in respect of Needs Case. Meanwhile the Needs Case for the EACN and hence the cables through this area has been further set in doubt as a result of the agreement of North Falls and Five Estuaries to connect

offshore to Sea Link and the arguments against Tarchon as set out by Sir Bernard Jenkin MP in his recent response to Ofgem on the matter and published here:
<https://www.bernardjenkin.com/sites/www.bernardjenkin.com/files/2024-05/Tarchon%20Consultation%20Submission%20Sir%20Bernard%20Jenkin.pdf>

You have ignored entirely our suggestion that the section of cable from the EACN at Ardleigh to Great Horkesley be undergrounded and given scant regard for the alternative request for extension of the underground section moving the eastern Sealing End Compound away from our Parish in order to mitigate the undoubted effects on our Parish and – in policy terms more important – impacts upon the protected National Landscape of the Dedham Vale.

You have argued that damage to the Dedham Vale is minimal, despite landfall maps which you have produced showing that there are points in the Dedham Vale where between 50 and 60 pylons will be visible, and that ‘full structures’ of Pylons will be visible across much of the Vale. You have stated that the proposed pylons will not form a ring of steel on the basis that they are too far away, yet a car travelling at the posted speed limit would cover the ground in under 60 seconds.

You have also wrongly argued that the Sealing End Compound at Great Horkesley is not visible from and hence will not damage the Dedham Vale being approximately 2km distant.

Meanwhile the relevant National Policy Statement for Electricity Networks NPS-EN5 has been updated by Government in order to remove the ‘grey area’ in which you previously attempted to argue that it was policy to build Pylons everywhere outside of the National Landscape of the Dedham Vale. The latest version of NPS-EN5 provides that:

- Even “residual impacts may well make an overhead line proposal unacceptable in planning terms”. (NPS-EN5 2.9.12)
- Although it is the government’s position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty). (NPS-EN5 2.9.20)
- In the Dedham Vale, “AND where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground”. (NPS-EN5 2.9.21)
- The two criteria for where undergrounding is not necessary are (i) “where it is infeasible in engineering terms”; and (ii) “where the harm that it causes is not outweighed by its corresponding landscape, visual amenity, and natural beauty benefits” (NPS-EN5 2.9.22)

The Holford rules, also embedded in NPS-EN5 also state that applicants should:

- “avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence.”
- “take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum.” (NPS-EN5 2.9.17)

The Horlock rules, also embedded in NPS-EN5 also state that applicants should:

- “avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections.”
- “protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas.” (NPS-EN5 2.9.19)

The Norwich to Tilbury cables do indeed cross the Dedham Vale which is a National Landscape. The Pylons and Sealing End Compounds between TB1 and TB41, located within our parish or nearby parishes, cause damage to the Dedham Vale at a level which your own documents demonstrate to be well beyond the merely ‘residual’. There is nothing in our parish or in the neighbouring parishes which would have led to difficulties in engineering underground cables, and given that they would pass through farmland nothing to suggest that damage done by undergrounding here would have outweighed the benefit to removing impact from the Dedham Vale.

Your proposals are deficient and do not conform to the requirements set out in NPS-EN5.

You should have “avoided altogether” this area and it was perfectly possible to do so: you could and should have removed the EACN from your proposals either by removing the connections entirely or alternatively through making them at a different location. Your Strategic Options Backcheck and Review demonstrates perfectly feasible alternative routes, which indeed are less costly than your proposed route, such as the EAS1 alternative set out therein but not consulted upon. Work by ESO as part of the East Anglia Review further demonstrates Alternative 5b which avoids the Dedham Vale altogether and Alternative 8 in which HVDC underground cables still proceed via the Dedham Vale but which would cause dramatically less impact, each of which at cost comparable to that of your present Norwich to Tilbury proposals.

You should have followed the strong starting presumption to underground TB1 – TB41 as required in Policy, and which we have previously requested.

The arguments contained in your response to our comments in respect of the 2023 Consultation are also deficient: you argue that cost is too high for the benefit achieved. Cost is not a relevant matter in the determination in this setting. Per NPS-EN5 2.9.22 feasibility and relative damage are relevant, but you have not argued either and nor can you argue either.

You have not sought to protect the beauty of this parish or the landscapes, historic buildings and views within it.

We remain greatly concerned by the impact of the proposed site for the Sealing End Compound in our Parish.

The siting of the sealing end compound at Horkesley Plantation necessitates multiple gantries and pylons in a small area in close proximity to both the Dedham Vale National Landscape / AONB and also to a very significant concentration of Listed Buildings at Great Horkesley (including a large number of Grade II listed and one Grade II* listed very near to the proposed route).

Our concerns are two-fold:

- 1) **Firstly:** Land in this area is exceedingly flat, with only a few metres between the local peak (55m, Redhouse Farm) and the intended location of the Sealing End Compound (50m).

There are no significant dips in the land and no other features capable of providing screening to or from either the listed buildings or the National Landscape.

Given the flatness of the land, any gantries, towers or pylons in this area will be widely visible.

Proximity of the CSE compound to the Essex Way will also cause significant harm to amenity for significant numbers of walkers from across the region and beyond

The industrialisation of the Parish in this area is entirely incompatible with the setting and will do significant and lasting harm to an area which, per the Horlock and Holford rules, should have been 'avoided altogether'. The situation is made more problematic by the concentration of infrastructure including gantries and heavier tension towers in a small space near to the Sealing End Compound which leads both to unacceptable wirescape and significantly increases the sense of industrialisation.

The choice of site is unsuitable as it would harm the setting of Listed Buildings at Great Horkesley. The site cannot be moved closer to the Dedham Vale AONB for the reasons already set out above and hence needs to be relocated significantly further East if it is to be located along the route currently indicated.

- 2) **Secondly:** We are concerned that vibrations from works will cause structural harm to residential buildings near to the cable route, many of which are Listed and lack foundations beyond a brick or two beneath the sole plate.

National Grid must employ a heritage consultant well experienced in buildings of north-Essex heavy timber frame construction in order to advise on the likely effects of vibration and potential methods of mitigation. In any event National Grid must also take responsibility for damage and must fully accept that damage may take a number of years beyond the construction period to become apparent.

Additional benefits of undergrounding the entire section from Ardleigh to (at least) Great Horkesley include the removal of the Sealing End Compound in our Parish from the plans entirely, which will improve the cost.

Wherever it is located, it is imperative that the Sealing End Compound is thoroughly screened from view from all Listed Buildings and that it is located such that even the tallest sections are perceived against woodland background in order to break up the visual impact in any directions where it is impossible to plant trees. The landscape in this area is dotted with small pockets of woodland, which also feature heavily near to ponds, along brooks and rivers, and occasionally between fields.

It would be perfectly natural in this setting to plant tall fast-growing native tree species densely along each side of the Sealing End Compound, Gantries and Tension Towers and to plant additional groups of trees along the line of site from nearby buildings and the main road, closer to the buildings and road (and hedging plants where it crosses the cables). Screening will provide lasting benefit and should be put in place immediately National Grid take control of the relevant areas to ensure that growth is established even before construction commences.

Significant Harm: Residences and Listed Buildings

We would draw your attention to the significant number of residences and listed buildings that will be in extremely close proximity to the proposed trenching works, haul roads and construction compounds. Significant harm to these listed and residential buildings is unavoidable and will include visual blight, noise and vibrations, which will not only affect their amenity and setting, but also (re vibrations) potentially their structural integrity. Concerns include the impact on Grade II* listed Chapel Cottage and significant cluster of other listed buildings and residences in close proximity to where the route crosses the A134, and several listed buildings along School Lane including New Barn

House (the haul road passing extremely close to such building without foundations, in the setting of which is a particularly beautiful pond, fed by the water table).

If the scheme is to go ahead as proposed, appropriate advice will be needed and significant mitigation measures and monitoring will be required.

Amenity and Impact on Roads, Residences, Vegetation and Farming

Great Horkesley is a rural Parish and our residents are greatly concerned by the impact of the proposals upon their day-to-day lives from noise, pollution and road congestion, the amenity of the local area for walks including on the Essex Way in close proximity to the Eastern sealing end compound and underground route, and upon farming.

The interests of local community and landowners / farmers must be put first ahead of National Grid's own convenience, even if that results in increased costs for National Grid. To ensure this the following mitigations and restrictions are essential:

- **Construction: Timing, Operational Hours, Impact:**

In order to protect the local population from disturbance, working and vehicle movements must not ordinarily be permitted on Sundays or Bank Holidays, nor outside of the hours of 8am and 6pm on any work day without the further agreement of the Parish Council.

Consideration as to reducing vehicular movements during peak traffic flow times should be given.

- **Construction infrastructure: Compounds**

The set down and construction compounds located either side of the A134 are in extremely close proximity to local residential and listed buildings, including Grade II* listed Chapel Cottage, Grove House, and the cluster of other residences and listed buildings at that point. It would however be easy to relocate such to mitigate the harm and disruption to residents caused by their visual blight and noise nuisance, and also reduce the visual impact of the scheme from the centre of the village at the A134. We would suggest that it will be easy to move such East behind farm buildings at TL 98185 31054 where it will have reduced visibility and noise nuisance to residents and beyond.

- **Haul Roads and Construction Vehicles:** National Grid's plans call for construction of haul roads alongside the cable route, in many locations on both sides of the line. This will increase construction time, cost of construction, cost of land reinstatement, and result in greater damage to soils over a longer period. Construction of haul roads must be minimised to that which is absolutely necessary. Instead, agricultural vehicles with larger lower pressure tyres suitable for use on farmland should be used in place of traditional road-suitable construction vehicles. This will eliminate or reduce the need for haul roads and result in quicker, cheaper reinstatement of land together with

better soil recovery. For the same reason the width of the construction swathe must be minimised. It is extremely close to residences and listed buildings at the A134 and along School Lane. We note that the current water-main installation project from Bury St Edmunds to Great Horkesley is making use of agricultural machinery and that very few, if any, concerns have arisen.

As set out above, local listed and heritage properties are particularly vulnerable to vibration and located in very close proximity to the proposed haul road (especially near the A134 and along School Lane). Haul roads should be moved as far as possible away from residences and listed buildings and appropriate mitigation and monitoring undertaken.

- **Alternative Construction Methods:** National Grid must investigate and wherever possible adopt new construction techniques such as 'cable ploughing' which are able to bury cables much more quickly and cause dramatically less damage to farmland, environment and ecology resulting in correspondingly faster recovery times.
- **Hedges:** Farm hedges are multifunctional elements in agricultural landscapes, providing environmental, agricultural, economic, aesthetic, and climate regulation benefits. They play a crucial role in promoting biodiversity, protecting crops, managing water and soil resources, and enhancing the visual and cultural value of the countryside. Maintenance of existing hedges is therefore essential for sustainable and resilient farming systems. National Grid plans to remove extensive sections of hedge at access and crossing points with local roads as well as between fields in open countryside.

The degree of removal indicated goes far beyond what is required and will inter-alia:

- significantly disrupt habitat impacting birds, insects and small mammals as well as removing corridors which connect distinct habitats and allow wildlife to move safely between areas causing a reduction in diversity. In turn this will reduce beneficial predation increasing the need for use of chemical pesticides and encourage pests into fields resulting in damage to crops.
- Remove natural windbreaks increasing soil erosion as well as increasing flow of water across fields causing increase run-off with similar outcome.
- Dramatically reduce shielding and thereby increase the visual impact of construction works affecting local communities and damaging, albeit temporarily, important visual receptors.

National Grid must minimize to the greatest possible extent the removal of hedgerow, ensuring that gaps created are wide enough only to allow access of machinery. In practical terms removed sections must not span greater than 12m. It will not be acceptable to widen removal beyond this for the purpose of increasing visibility towards roads and consequently National Grid must make use of 'stop lines' for traffic

on haul roads at each crossing point to ensure safety of passing traffic, employing banksmen to ensure public safety.

Sections of hedge scheduled for removal must be protected with netting for a year prior to removal to minimize impact on nesting birds.

Removed sections must be replanted with appropriate native species to match remaining hedge immediately upon the completion of construction within each field, to a standard agreed with landowners and farmers, and must ensure that hedges are subsequently coppiced and / or laid after an appropriate period in order to promote ecology.

- **Removal of Soil:** depth of topsoil ranges between 6" and 24" in the parish, sitting atop heavy clay. Care of soil during removal is essential to ensure that following reinstatement works yields can return to former levels avoiding lasting physical and economic damage. Therefore, National Grid must:
 - Ensure professional supervision during assessment, removal and storage of topsoil.
 - Determine and agree the appropriate depth of soil to be removed with landowners and farmers
 - Ensure that clay is removed and stored separately, avoiding mixing during works and storage. Where necessary membranes must be employed to prevent mixing with soil.
 - Use membranes beneath any haul roads which despite foregoing comments are still necessary, ensuring separation between agricultural land and aggregates used in construction of the haul roads. Membranes must extend beyond the haul road in order to prevent overspill.
 - Employ only lighter agricultural vehicles suitable for field work in the vicinity of removed soil in order to avoid compaction. Minimise traffic for the same reason.
- **Drainage and Flood risk:** National Grid must consider drainage during and after construction, setting out plans for agreement by landowners and farmers prior to construction. It should be noted that our Parish already has significant issues with regard to run-off and flooding after heavy rain on local roads (and on occasion ingress to local residences) and the impact of construction (including impacted soil) must be properly assessed. During construction detailed plans in respect of each field crossed must take account of land contours and consider existing drainage, disruption of flow due to soil / clay storage, haul roads and construction sites ensuring that land does not become waterlogged or dry and controlling run-off rates to avoid soil erosion both within and outside of the construction swathe, and localised flooding. As a minimum this will require installation of land-drains either side of haul roads picking up existing drains where possible. After reinstatement National Grid must reconnect existing drainage promptly and provide for inspection after 1, 3 and 5 years to identify and correct emergent issues as land settles.

Irrigation: farming in the area relies upon irrigation from boreholes contained within the land. Boreholes must be carefully protected during and after construction ensuring that sufficient flow remains available and accessible in all parts of impacted fields. Where this cannot be ensured National Grid must compensate landowners and farmers for consequential losses and must promptly act to reinstate supply through the provision of new boreholes as required. After reinstatement National Grid must reconnect existing supplies promptly and provide for inspection after 1, 3 and 5 years to identify and correct emergent issues as land settles.

- **Land Access, Land Security, Animals. Reinstatement of Soil and Economic Damage:** Appropriate measures must be taken to ensure land access, protect land security, take account of animals, and reinstate soil after construction, with appropriate compensation paid for any and all damage to land and economic interests.

Public Highway

We note that you intend to direct the vast majority of construction traffic destined for section D via the A134 through our village. This means that one road, which passes through the residential Chesterwell area before it enters our rural village, will bear the brunt of all the very significant extra traffic generated for construction of haul roads, pylons (beyond our parish) underground trenching, sealing end compounds, and related infrastructure and landscaping, causing significant harm.

From your own figures, you estimate the following:

An extra 321 vehicles per day along the VUR, NAR and A134, of which 193 will be HGVs. This will be a 64% increase of HGVs along Nayland Rd / The Causeway.

You yourselves declare the road to be sensitive.

We are greatly concerned that the A134 will not be able to cope with the volumes of traffic caused and that this will cause significant harm including:

- (i) Increased risk to pedestrians and cyclists, including school children who walk and cycle to the Trinity School in Chesterwell from the village along the A134 and pedestrians who need to walk along and frequently cross the A134 to and from amenities such as the primary school, village hall and recreation ground, and bus stops;
- (ii) traffic congestion, noise and pollution;
- (iii) inconvenience to our residents, representing as it does the main access from the Parish to Colchester and its local amenities, including the railway station, supermarkets, offices and secondary schools
- (iv) push local traffic away from the A134 onto unsuitable other local roads which will then be unable to handle the additional volume (including Boxted Road, Coach Road, and London Road). Many local roads are single-track countryside lanes

with passing places unable to take a constant flow of traffic and bottlenecks will easily result.

We are also concerned that removal of street-furniture and traffic-islands will have a dramatic impact on the speed of traffic and on both road and pedestrian safety. Great Horkesley is a linear village centred along the A134. The pedestrian footways are located only on one side of the A134 and changes between being located on the West side, to the East Side, and to the West Side again. There are no pedestrian crossings and traffic islands are essential both for road calming and for providing pedestrian refuges.

We therefore suggest that the A134 be removed from your plans and replaced with access directly from the A12 via new temporary slip-road which you construct from the A12 at the point the route crosses the A12 between Colchester and Langham. If this is insufficient or if secondary access is required, we suggest that you investigate whether access can be gained via Colchester Park and Ride again avoiding use of the A134.

In the event that the current proposals are to proceed, and road safety features are to be removed, it is unclear how safety will be maintained, and it is noted that no details are given by you – we ask that, to the extent that such proposals are pursued, this be given specific consideration and detailed plans set out as to the maintenance of road calming and safety, including pedestrian crossing points and refuges.

The underground section of the proposed route crosses the A134, School Lane (twice) and London Road. It will not be possible to open-trench beneath these roads without serious disruption and cutting off half of the Village from substantially all access routes to Colchester. The A134 in particular is unsuitable for any road closure with no diversion route avoiding single-track lanes which are wholly unsuitable and, from experience, get insurmountably jammed in such event. It will therefore be essential that trenchless crossing methods such as directional drilling are employed to avoid disruption.

Position of Great Horkesley Parish Council

We hereby reiterate and repeat the contents of our previous submission in respect of the 2023 non-Statutory Consultation with respect to the present 2024 Statutory Consultation requesting once more that the matters therein are this time **properly** addressed.

Furthermore we adopt and reiterate the arguments set out by Sir Bernard Jenkin MP in his recent submission in respect of this consultation, as published here:

<https://www.bernardjenkin.com/sites/www.bernardjenkin.com/files/2024-07/National%20Grid%20Consultation%20Bernard%20Jenkin%20Response.pdf>

It is the position of the Parish Council that:

- We continue to believe that an Integrated Offshore Grid represents the best long-term interests of the UK as a whole.
- Your Norwich to Tilbury proposals would bring very significant harm to this parish, the listed buildings and landscapes within it, and to the Dedham Vale National Landscape / AONB.
- Your proposals fall outside of the requirements of local and National Policy NPS-EN5.
- North Falls and Five Estuaries should combine offshore with Sea Link.
- The Tarchon project should not go ahead with a connection at the location currently proposed.
- The EACN is in the wrong location and / or not required.
- Regardless of which, you are required by National Policy to adopt an alternative route, such as EAS1, ESO Alternative 5b or ESO Alternative 8, avoiding the Dedham Vale and this Parish entirely.
- Even if you do not, you are nevertheless required by National Policy to underground the entire section of line between TB1 and TB41/2, or at least TB31/34 at Great Horkesley. We endorse the submissions of Colchester CC in this regard.
- Your argument that the cost of additional underground line in this area is not justified by reduction in impact to the Dedham Vale is not appropriate as firstly, cost is not a relevant argument in the terms of NPS-EN5 within this setting, and secondly because in the terms of NPS-EN5 even residual impact is unacceptable in planning terms.
- The use of underground HVDC technology, as proposed by ESO in Alternative 8, would represent a far better approach to this problem and should be employed for the whole project as it would afford protection to the whole line including significant improvements within the areas already proposed to be underground due to the significantly narrower trenches and working space requirements.
- If it still exists, the Sealing End Compound at Great Horkesley must be in another location further to the East and sited further from the national landscape/AONB and in less visible areas in conformity with the Horlock and Holford rules. Wherever the Sealing End Compound is located it must be fully screened with tall native tree species such that it cannot be seen from any listed building or in any direction from or into the Dedham Vale. Its visual blight is significant due its sheer scale and height.

- The set down and construction compounds located either side of the A134 must be located away from residential and Listed Buildings. You should investigate the possibility of locating these near to farm buildings or other commercial activities to minimise disruption to residents and suggest that it will be easy to move such East behind farm buildings at TL 98185 31054 where it will have reduced visibility and noise nuisance to residents and beyond.
- The A134 should not be used to carry the majority of construction and other traffic for the project in section D and proper consideration ought to be given to alternative, direct, routes from the A12 to reduce the significant harm that would otherwise occur; in any event appropriate measures must be taken to maintain public safety. Further, road closures should be avoided, especially on the A134, during construction (and trenchless crossing technology utilised).
- The hours of operation for both construction and vehicle movements must be reduced to avoid Sundays, bank holidays and evenings.