

LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in the Commission's Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Commission's scoping opinion.

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Infrastructure Planning Commission
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FAO: Simon Butler

Enquiries to: Rachel Collins

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Your Ref: 100727_TR04002_170183

Date: 24th August 2010

Dear Mr Butler,

Proposed Ipswich Chord Development – Infrastructure Planning (Environmental Impact Assessment Regulations 2009 – Scoping Opinion: Response from Suffolk County Council

Suffolk County Council are generally satisfied with the scope of the topic areas which will be addressed in the Environmental Statement, but we would like to draw attention to the following particular environmental issues that will require mitigation and or compensation.

Policy Context and Need for Development

The site proposed is a former employment site and, as Ipswich Borough has a shortage of employment land (Suffolk Haven Gateway Employment Land Review 2009), employment sites should be retained for employment uses. However, it is understood that the Chord is essential for the growth of the Port of Felixstowe, which in turn is identified in the Suffolk Haven Gateway Employment Land Review as being the major economic driver for growth in the part of the county. High growth at the Port of Felixstowe is essential to provide the jobs required in Ipswich and the provision of infrastructure to achieve this should be supported.

Additionally, the site is identified in the preferred options of the Sites DPD of the Ipswich LDF for both the rail chord and employment uses and that no redevelopment of the site should constrain the provision of the Chord. The County Council has supported Ipswich Borough Council's approach to the site through the LDF process so far and therefore supports this application on strategic planning and economic development grounds.

Air Quality and Climate Change

As a general comment, please can the credentials of the personnel carrying out the noise and air quality work be included as this is always helpful when reading through an EIA.

Ipswich Borough Council (IBC) will shortly be declaring a further AQMA and the Consultant is advised to liaise closely with IBC to obtain the most up to date information. The

assessment of dust from construction activities should include a Dust Management Plan identifying methods of mitigation. We understand that idling trains have been a particular cause for concern for nearby residents adjacent to current railway facilities and note that this will receive detailed attention. IBC may well have further comment on this aspect. The reference to the National Air Quality Strategy is also noted.

Noise and Vibration

There are likely to be significant noise effects from both construction and use of the proposal, as identified in the Scoping Report, with activities being carried out 24 hours per day, 7 days per week. It is understood that details of construction activities may not be available at present, but as indicated, it is important that particularly noisy activities such as piling are identified and alternative methods considered, where appropriate. For all noise modelling work carried out using CadnaA, would the Consultant please be aware that further input/output detail may be requested once the EIA is received and that he/she should make sure that the software settings are enabled to allow this information to be inspected. If there are queries relating to this aspect, please do not hesitate to contact me.

With respect to operational noise, there is no mention of the use of the Calculation of Railway Noise methodology. Does this form the basis of CadnaA? Care should be taken with the use of the WHO guidelines as they do not necessarily provide protection to the amenity of the locality, being more related to sleep disturbance and health effects indoors, particularly during the night-time period. The comments relating to noise squeal are noted and that it has been scoped out. This type of noise may, however be more noticeable due to its character when compared with other noise associated with the railway, particularly during the quieter night-time period. Whilst understanding that this may be difficult to quantify, rail squeal should be included in the assessment with an indication of the likely frequency of the event. Also if it is not considered to be an issue at the nearest dwellings, why this is the case.

Townscape and Visual Amenity

The applicant should identify and mitigate the landscape impact of the development, especially in relation to residential receptors. The land between the proposed new railway embankment and the River Gipping should be seriously considered as new publically accessible natural green space. Public access to the is area could be incorporated into the new rail bridge across the River Gipping close to the EA sluice, and the existing Lowestoft and Felixstowe branch line bridge if this is to be extended; a third access point from Hadleigh road and under the new embankment would be of considerable benefit.

Ecology

The development should identify and mitigate the risks in relation to protected species. 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 new compensation habitat should be provided in advance of development commencing. This could be related to the public open space provision mentioned in 3. below. Furthermore the development should, wherever possible, enhance the quality of the River Gipping as an ecological corridor in the urban landscape. To obtain detailed species and other ecological information the project team should contact the Suffolk Biological Records Centre (SBRC).

Archaeology and Cultural Heritage

The proposed development is located in an area of high archaeological potential. The floodplain of the River Gipping and area immediately above of the River Gipping have a high potential for prehistoric and Anglo-Saxon remains, attested by the presence of Bronze Age remains (IPS 104, IPS 400) and Saxon funerary remains (IPS 231, IPS 016) within or in close proximity to the proposed development area. There is also high potential for geoarchaeological remains, relating to former river courses and alluvial deposits along the floodplain of the river.

In accordance with policies HE6.1, HE6.2 and HE7.1 of PPS 5, sufficient supporting information will need to be provided in the Environmental Statement to enable the impacts to be fully assessed, in order for the Local Planning Authority to be able to take into account the particular nature and the significance of the heritage assets, which will be directly impacted by the development, and also to take into account the indirect impact on the setting of any designated heritage assets.

SCC acknowledge the proposals for the provision of a desk based assessment (4.10.1), although the requirement for a staged programme of archaeological investigation to support the environmental statement (4.10.2a) needs strengthening and more clarification. We recommend the following evidence should be provided in the Environmental Statement for archaeology

- Trial trench evaluation (5% sample of the development area)
- Geoarchaeological assessment of this part of the Gipping Valley, to enable the deposit sequence and buried geoarchaeological features in this area to be better understood.

If the proposed development will result in damage to any heritage assets, the Environmental Statement should include proposals to record and advance understanding of the significance of the heritage assets before they are damaged (Policy 12.3 of PPS 5).

We would be pleased to offer further guidance and the Conservation Team of SCC Archaeological Service will, on request, provide a specification for each stage of any archaeological investigation.

Traffic and Transport

The effects on existing walking and cycling routes along the river line need to be in scope for both construction and operation phases, this has only been scoped for the construction phase.

Suffolk County Council's Highway Network Improvement Team are concerned about the effect of the proposal on current and future provision for walking and cycling. The existing tow path route could be adversely affected by the work during construction and by the permanent infrastructure. It is therefore important that any adverse impacts are fully detailed and avoided.

SCC would also like Network Rail to be mindful of any impact that these proposals on any potential future enhancement, improvement or upgrade of walking and cycling routes along Sproughton Road and the river towpath route. The Former Sugar Beet Factory Site in Sproughton (Babergh District) is identified as a Strategic Employment Site and therefore there will be a need for that site to have adequate and appropriate routes to and from it for

walking and cycling, particularly between it and Ipswich. The existing flood defence sluice gate structure (steps) is a current impediment to walking/cycling along the tow path route. If National Rail's proposals include the modification or replacement of this structure then they should be required to make provision through the replacement structure for easy walking / cycling - no steps and adequate width.

Yours sincerely

Rachel Collins
Spatial Planning Projects Manager

Date: 2 July 2010
Our ref: EE09/10.2102
Your ref: CCMS No. 10683973/10734005



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(By email only, no hard copy to follow)

Dear Ms Carter

Felixstowe to Nuneaton: Ipswich Chord Environmental scoping report – IPC notification pack

Thank you for consulting Natural England on the environmental scoping report for the proposed Ipswich Chord railway scheme. We have the following comments to make in connection with the scoping report.

In accordance with Natural England's statutory remit, we agree that the scope of the Environmental Impact Assessment (EIA) should include impacts on landscape and visual impact, ecology, soils and geology, water quality, hydrology and hydrogeology. These are discussed in more detail below.

Landscape and visual amenity

I am not clear why the desk study for landscape/townscape impacts should focus on designated sites, habitats etc (section 4.6.1) as these fall more properly under ecology. The desk study should identify landscape character types, any protected landscapes, such as AONB, any areas of special landscape value and important landscape features that may be affected by the development.

We agree that the visual impact assessment should include the impact on users of the public footpath by the River Gipping.

Ecology

This reply gives our advice on the requirements of Regulation 48 of the Conservation (Natural Habitats, &c.) Regulations 1994 (known as "the Habitats Regulations").

The proposal may indirectly affect Stour & Orwell Estuaries SPA/Ramsar site which is a European site protected under the Habitats Regulations.

Regulation 48 requires the competent authority, before deciding to give any consent to a project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects), and (b) not directly connected with or necessary to the management of the site, to make an appropriate assessment of the implications for the site in view of its conservation objectives.

In this case the proposal is not directly connected with or necessary to the management of site but to advise whether it is likely to have a significant effect on a European site, the following further information should be provided:

- Likely changes to water quality and water flow to the estuary
- Likely impacts on bird species which are a notified feature of the SPA/Ramsar site

The EIA should also consider any likely impacts on notified features of Orwell Estuary Site of Special Scientific Interest which are not international features.

The EIA should consider the impact on River Gipping County Wildlife Site (CWS) and Alderman Canal CWS. Historic data should be obtained from Suffolk Biological Records Centre 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 development should have up-to-date survey information. The River Gipping is an important wildlife corridor. If there is likely to be an increase in lighting during the construction and/or operation of the Chord and associated structures, then surveys for bats and otter using the Gipping should be carried out.

Please contact me for any further consultations in relation to this proposal.

Yours sincerely



Dr Alison Collins
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ENGLISH HERITAGE

IPC

26 AUG 2010

EAST OF ENGLAND REGION

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Our Ref:
Your Ref: I000727_TR0400002_170183

24 August 2010

Dear Sir

**PROPOSED IPSWICH CORD DEVELOPMENT BY NETWORK RAIL
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263**

Thank you for your letter dated 27th July 2010.

I have read the parts of the Environmental Scoping Report relevant to English Heritage.

It appears that there are no listed buildings, scheduled monuments or historic landscapes that would be significantly affected by direct or indirect impacts from this proposal. Chantry Park is a Registered Park and Garden, but is situated over 200m to the southwest of the site beyond an area of established housing and other development.

I assume that the applicant will contact Ipswich BC and Babergh DC regarding local designations including conservation areas, and that they have consulted the Historic Environment Record and Suffolk County Council with regard to archaeology, but as the report cites there is potential for damage to unknown or undesignated assets of this type.

I would not wish to comment further on the general methodology of the Scoping Report.

I hope this is of assistance.

Yours sincerely

pm Michael Munt
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The National Monuments Record is the public archive of English Heritage



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**Attention: Mr Simon Butler, EIA and Land
Rights Manager**

Our ref: PCW/DJS

Your ref: 100727_TR040002_170183

IPC

24 August 2010

31 AUG 2010

Dear Sirs

REF:

PROPOSED IPSWICH CHORD DEVELOPMENT CONSULTATION

Thank you for your letter of 27 July 2010 regarding the above proposal.

In response to the issues raised in your letter, I would confirm that my Council has:-

- (i) no information or further information which the Council would wish to see provided in the Environmental Statement, and
- (ii) the Authority has no further comments other than set out in (i).

Yours faithfully

Peter Warner
Head of Planning and Development