

Your Ref: DCON(D)/15/2151
Our Ref: SCC/CON/0710/20
Date: 19 February 2020
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.

Email: planning.help@westsuffolk.gov.uk

The Planning Department
West Suffolk (BSE)
Development Management
West Suffolk House
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Bury St Edmunds
Suffolk
IP33 3YU

For the attention of: Penny Mills

Dear Penny Mills

TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DCON(D)/15/2151

PROPOSAL: Construction Method Statements 15.01.20, ref:

Application to Discharge Conditions 12 (construction and environment management plan) and 25 (HGV movements) of application DC/15/2151/OUT.

LOCATION: Land Ne Haverhill Wilsey Road Little Wratting CB9 7TB

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following comments which form a HOLDING OBJECTION:

These comments refer to the Construction Traffic Management Plan (CTMP) and Appendix A of Construction Method Statement.(CMS) We are not commenting on any other part of the CMS, however, we note section 2.6 and Appendix D states the Public Rights of Way within the site will remain open during the construction phase and have 'adequate protection'.

We inform the applicant that some of these rights of way form part of the travel to school routes between Kedington and Haverhill and these must remain open and accessible for all users INCLUDING students. If the applicant proposes to close or restrict them at any time during the construction process, due notice should be given to both Suffolk County Council Highway and Education teams. The travel to school routes are based on distance from the school and should these rights of way be closed during school term times, alternative travel to school arrangements will need to be agreed and this may be at the applicants cost.

We are not commenting on whether the proposed protection of the rights of way is 'adequate' as there is insufficient detail. Drawing 8511-RED-ZZ-DR-C-002 Rev B does not show any rights of way within the site to be fenced. We accept the applicant intends for these measures to be 'adequate' but further details of their proposal should be submitted.

We note the applicant has revised the layout plan in appendix A. The layout does not appear to take into account the construction of the internal infrastructure on which it relies. This must be clarified before further consideration can be made of this application. Para 4.3.2 of the CTMP states the infrastructure will be constructed in parallel to parcel A1 and A2. Therefore the layout shown in Appendix A is clearly undeliverable.

If relevant, the applicant can show a CTMP/CTMS for each construction phase until the necessary infrastructure is constructed, but we cannot accept the layout shown as this is not deliverable from the start of construction.

For the CTMP we are commenting ONLY on the construction that affects the A143, we are assuming that all HGV's associated with phase 1 will be accessed via the A143 (indeed, even if a Chalkstone Way construction access is approved, all HGV's will access A143 first to be re-routed under control to Chalkstone Way, as previously proposed.)

Additional comments the applicant should take into account when submitting further information.

1. The wheel wash facility is not located close to the highway. It appears traffic leaving the site after the wheel wash will have to travel over a significant length of road that will be also run over by vehicles carrying mud on their wheels and bodies. We recommend the wheel wash is sited approx. 50m back (and downhill) of the highway with its own drainage system. The road between the wheel wash and the highway should be hardened and an operative should be on duty to ensure all vehicles have mud removed. A road sweeper and driver should be on site at all times but should not be relied on to keep the highway mud-free.
2. Gates should be sites 20m back for the highway to allow HGV's to pull fully off the highway when the gates are closed. The application may also include security fencing in front of these gates when the site is closed and should submit details of this.
3. The applicant notes this CMS is for pre-occupation only. We expect the applicant to submit a revised CMS and CTMP once construction is underway, prior to any occupation, to be approved before first occupation of any dwelling. However, the Sales Office and parking are located in the middle of the area noted on the Construction Traffic Management Plan as to be built out 2020-2025. How will this work with the construction traffic? How will sales office staff and visitors be managed within the construction site?
4. How will HGVs 'held' in the HGV holding area be managed?
5. The CTMP refers to a CEMP (Para 3.3), however we cannot see this with the submitted documents. Construction routes and times are shown in section 4 of the CTMP. Can the applicant confirm that the information in the CTMP will not be contradicted or altered by the CEMP?
6. The pedestrian and cycle access to the compound should be shown. This appears to stop short of the A143. It is conceivable that visitors to the sales office may arrive on foot, how will their route through the site be managed?
7. The pedestrian access should show connections to the bus stops on the A143 to show the connectivity with public transport which the CTMP claims to be promoting (para 2.1.2)
8. Details of the protection and control of public footpaths through the site should be shown. These should be more specific than appendix D and should include fencing, gates, security, lighting, and surface.
9. The applicant claims to 'encourage the use of greener vehicles', to this end we would expect to see electric vehicle charging points for staff and site vehicles.(para 2.1.2)
10. The applicant also notes they will 'encourage the use of sustainable/environmentally friendly construction freight vehicles'. (parp 2.1.2) but no further details are given of how this will be managed.
11. The applicant should provide the signing strategy noted in para 6.4.1
12. The applicant should provide details of the Delivery Management System noted in para 6.4.2. If the actual strategy is designed to be fluid, the strategy concept parameters must be evidenced.
13. We are concerned with the inclusion of the proposed access/s from Chalkstone Way. (Figure 1.1, 5.2 and 5.3. of the CTMP) - Para. 1.3.1 of the CTMP states the document is for the northern, A143 accesses only. This needs to be clarified and comments relating to any Chalkstone Way construction access should be removed from this document.

14. Para. 5.3.2 of the CTMP notes that the construction access and haul road will be removed and all the delivery movements will use the A143 roundabout. This is not reflected in Appendix A of the CMS. This needs to be clarified.
15. Para. 6.2.2 of the CTMP notes Stakeholder Meetings which we feel would be a positive contribution the Construction Traffic Management Plan to achieving a safe construction. We recommend the applicant suggest suitable timings/triggers for these meetings and nominate the key person responsible for organising and managing these. It is important that the highway authority and LPA understand the key personnel and reporting system should any urgent issues occur.
16. We note the contents of sections 8 & 9, but as they rely on conceptual management and monitoring, we cannot comment directly at this time. However, we would expect to be involved in subsequent conversations, along with the LPA, on how these issues will be/are being managed.

Yours sincerely,

Hen Abbott
Development Management Engineer
Growth, Highways and Infrastructure

Yours sincerely,

Hen Abbott
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