



Suffolk County Council (20041323)
Babergh and Mid Suffolk District Councils (20041302)

Local Impact Report: Annexes A to F
Bramford to Twinstead (EN020002)

Deadline 1

25 September 2023

A Babergh and Mid Suffolk District Councils and Suffolk County Council Position Statement on the Bramford to Twinstead Project - Assessment of Effects in the Brett Valley, 2013

**Babergh/Mid Suffolk District Councils and
Suffolk County Council**

POSITION STATEMENT

**Bramford to Twinstead Project
Assessment of effects in the Brett Valley**

The Connections Options Report (COR) describes the cultural association of “the lesser known artists Sir Cedric Morris and Arthur Lett-Haines” with the “small and unremarkable [Brett] valley”¹.

The terminology used in the COR neither captures the significance of the East Anglian School of Painting and Drawing based at Benton End Farm, nor the qualities of the Brett Valley which warrant its status as a Special Landscape Area² (notably that, in being an intimate valley, it shares characteristics of the AONB and Stour Valley). The relationship between the landscape and the various nationally renowned artists who worked at Benton End is also insufficiently analysed and consequently the significant *cultural* value of the landscape is not properly recognised.

The historic character of the Brett Valley landscape provided the context for much of these artists’ work, informing, influencing and shaping it. Maggi Hamblin has noted this with particular reference to Cedric Morris (see overleaf). It is not clear, therefore, what the basis is for the conclusion that the “local landscape is not acknowledged as inspirational to well-known artists in the same way that Dedham Vale and the Stour Valley is associated with Constable and Gainsborough”³.

In any case, the COR is inconsistent in its analysis and conclusions – it is acknowledged in paragraph 11.185 that “there is limited evidence that specific views of the Stour Valley were painted by Gainsborough” and that “Constable mainly painted in the Flatford area” (Constable also painted in the Brett Valley – ‘Overbury Hall’ is displayed at the V & A), yet these cultural associations are cited as a reason for undergrounding (paragraph 11.204) in that case.

While the COR recognises that Benton End has a setting which is informed by its cultural associations⁴, this is not expanded to explain the significance or extent of that, nor how an overhead line would affect that; instead the Assessment of Effects reverts to consideration of the impact on the setting of Benton End Farm as a listed building only, as opposed to the wider landscape setting.

Consequently the councils consider the following work needs to be undertaken;

- Historical analysis of the significance of Benton End in the context of the artists known to be associated with it

¹ Paragraphs 7.152 and 7.17 respectively.

² As expressed previously, there has been an over-reliance on landscape ‘value’ as opposed to sensitivity. That the Brett Valley does not have a national designation does not enhance its ability to host an overhead line. This issue is detailed in a separate Position Statement on Assessment of Landscape and Visual Effects [to follow]

³ Paragraph 7.169 (in any case the conclusion is ambiguous as NG has already concluded that the artists are ‘lesser known’, so is this simply being reiterated or is it also being said there was no link to the landscape.

⁴ Paragraph 7.76

- Analysis of the influence of the adjoining landscape on those artists to establish an understanding of context/setting
- Establish impact of existing line on appreciation of this landscape
- Establish cumulative impact of a further line in this landscape.

Maggi Hamblin Statement – EADT

The East Anglian School of Painting and Drawing, first established in Dedham in 1937, next in Higham and finally at Benton End Farm on the outskirts of Hadleigh from 1940, was one of the most original and influential centres for artists and writers of the 20th Century.

Among those who visited and worked there were artists Francis Bacon, Lucien Freud, Maggi Hambling and Kathleen Hale; writers Ronald Blythe, Randolph Churchill, Elizabeth David, Vita Sackville-West, Antonia White and Angus Wilson; musicians Benjamin Britten and Peter Pears.

The book 'Benton End Remembered' contributes to the ongoing research into this extraordinary place and those who worked there.

The Brett Valley, stretching before the house, was a major subject of Cedric Morris's work and examples are to be found in many public collections. I number among the students who were equally inspired by this particular landscape.

The curves of the Brett are flanked by a vast rolling sweep of fields rising up to Constable's sky. The imposition of more large pylons would certainly ruin the Brett Valley – a landscape clearly as important as those of the Dedham vale and the Stour.

This would amount to an act of vandalism, not only upon a unique environment but upon a significant part of our cultural heritage for generations to come."

B Babergh and Mid Suffolk District Councils and Suffolk County Council Position Statement on the Bramford to Twinstead Project - Assessment of Effects in the Brett Valley (Addendum – Detailed Alignment Options, Hintlesham Hall, Hintlesham, Suffolk), 2013

Babergh/Mid Suffolk District Councils and
Suffolk County Council

POSITION STATEMENT

ADDENDUM

**Bramford to Twinstead Project
Detailed alignment options, Hintlesham Hall, Hintlesham, Suffolk**

Babergh/Suffolk District Councils and Suffolk County Council produced a joint Position Statement on 7 May 2013 outlining its views on two options developed for the routing of a new overhead electricity line to the west of Hintlesham Hall, Hintlesham.

In response to the production of the Position Statement, National Grid has undertaken further detailed work in an attempt to address the issues raised by the local authorities and English Heritage in respect of this part of the route. This has culminated in the production of another detailed routing arrangement known as Option Three.

The local authorities accept that Option Three would marginally reduce the impact of the scheme upon the setting of Hintlesham Hall a Grade 1 listed building and lessen the impacts upon other listed buildings, notably College Farm and the visual amenity enjoyed by residents of that property. This option also reduces the impact on Square Pastures covert.

National Grid has outlined some limited mitigation proposals to reduce the impact of the scheme upon the setting of Hintlesham Hall and the surrounding landscape however notwithstanding these revisions the local authorities remain firmly of the view that the capacity of the receiving environment to undergo further change without compromising the setting of Hintlesham Hall is already very limited if not non-existent.

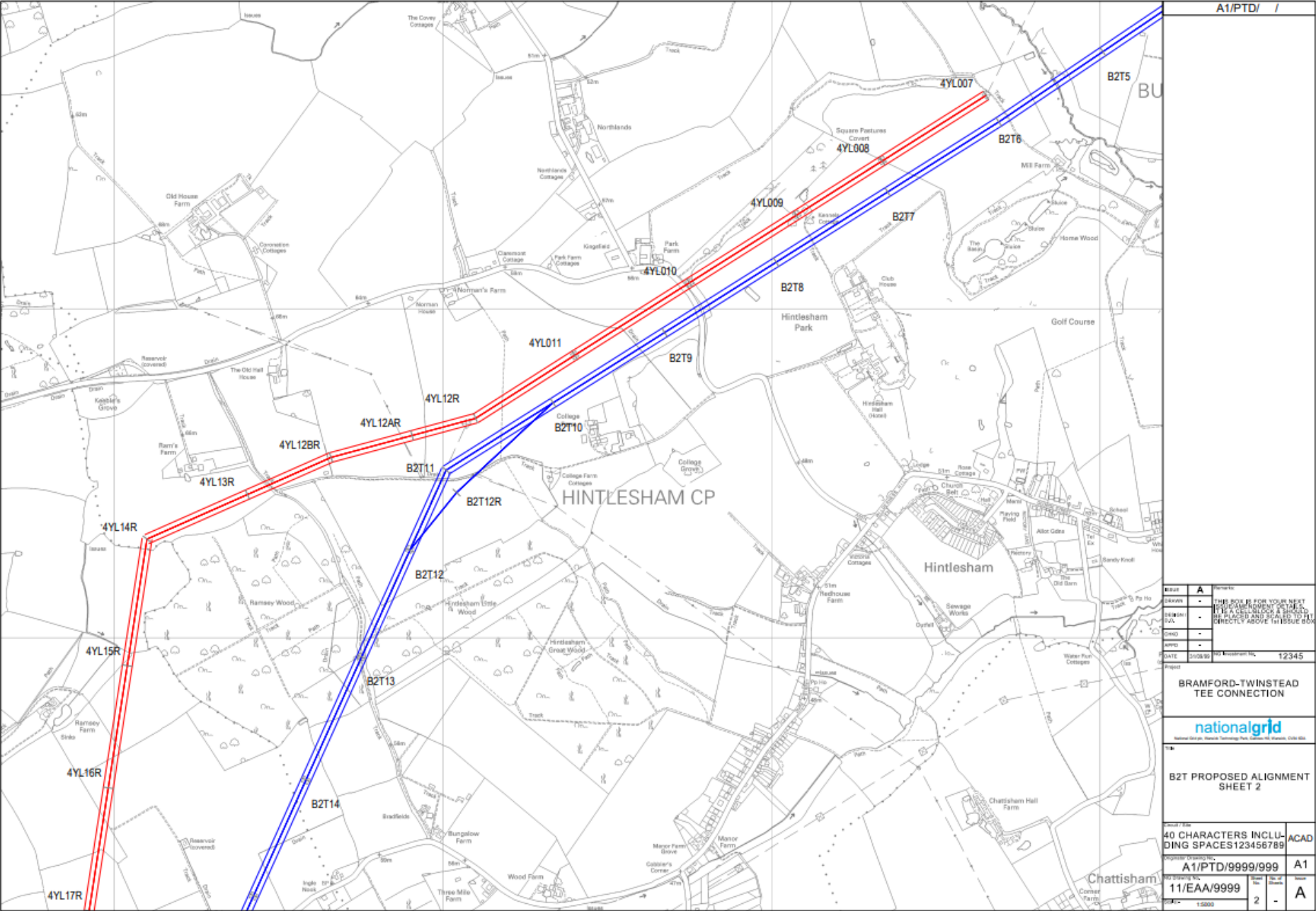
While Option Three and the associated mitigation measures are welcome, the local authorities do not consider that they are commensurate with the scale of the impacts that would be created by the proposal. As stated in the Position Statement the interaction of the proposed scheme with the baseline (existing line) does not appear to have been fully taken into account. Indeed National Grid acknowledges that overhead lines exist (subject to periodic refurbishment) "in perpetuity".

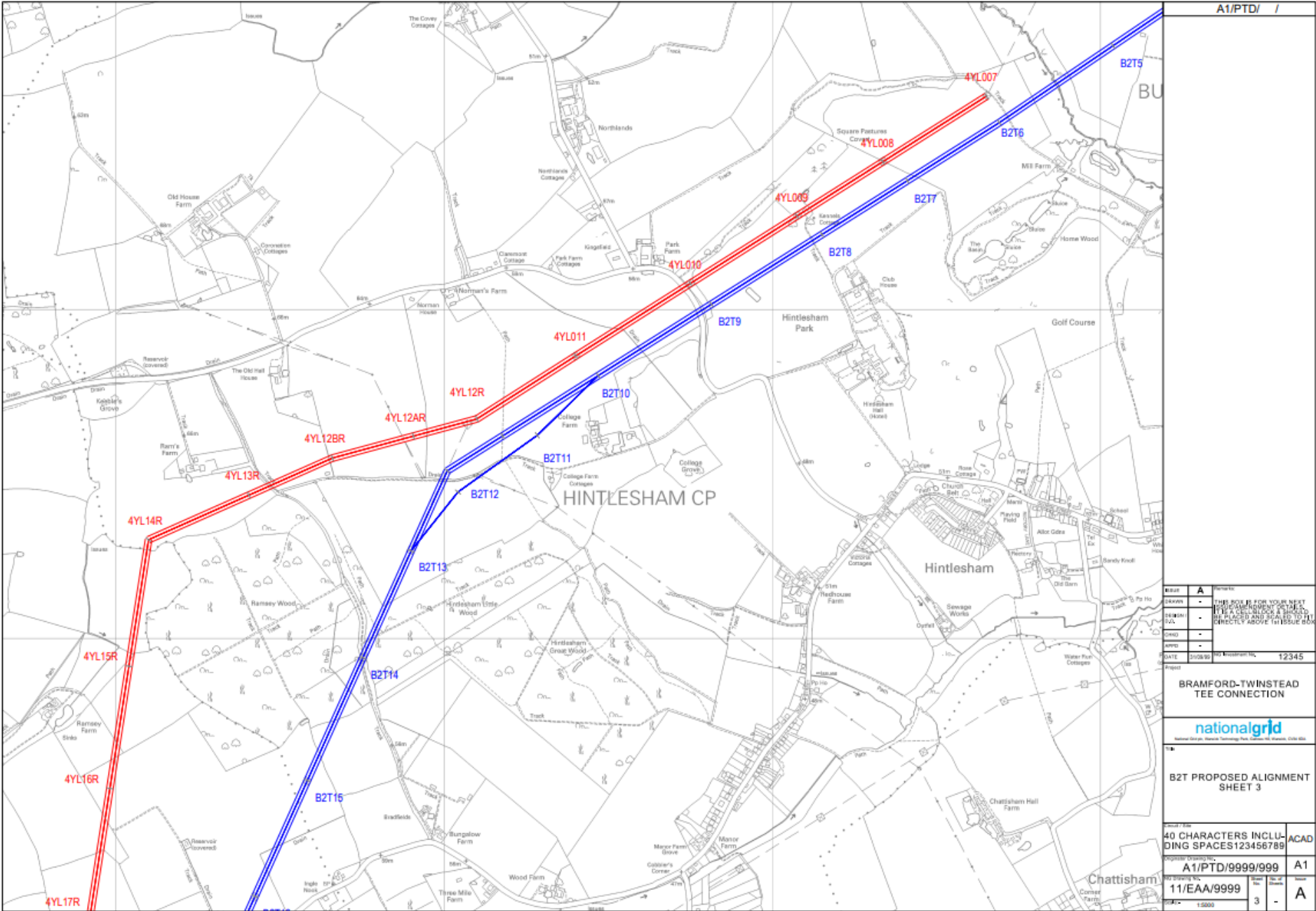
In the absence of a comprehensive mitigation scheme which provides for the meaningful assimilation of the additional overhead line into the landscape the local authorities remain of the view that the proposal will have an adverse impact upon the setting of Hintlesham Hall, a Grade I listed building.

The local authorities therefore consider that the additional overhead line should be placed beneath ground in this section of the route.

The local authorities reserve the right to comment further should more information become available.

17 September 2013





A1/PTD/ /	
<p>THIS BOX IS FOR YOUR NEXT DISCREPANCY DETAILS. IT IS A CELL BLOCK & SHOULD BE PLACED AND SEALED TO IT DIRECTLY ABOVE THIS ISSUE BOX.</p>	
DATE	21/02/99
PROJECT	12345
BRAMFORD-TWINSTEAD TEE CONNECTION	
B2T PROPOSED ALIGNMENT SHEET 3	
40 CHARACTERS INCLUDING SPACES 123456789	ACAD
Project Reference	A1/PTD/9999/999
Revision No.	11/EAA/9999
Scale	1:5000
Sheet	3
Issue	A

C Design Principles for the Bramford to Twinstead 400kV Project, 2023

Preliminary design principles for the Bramford to Twinstead 400kV project

- C.1 The following preliminary design principles are offered by SCC and BMSDC, in order that good design can be embedded at every stage of the project, in accordance with both current and emerging policy in the National Policy Statements.⁵
- C.2 It is considered that there are opportunities for effective placemaking at the four sealing end compounds and two substations, that should be fully exploited to ensure effective mitigation, as well as biodiversity and environmental net gain in accordance with the requirements laid down by Ofgem for both new projects, and in respect of the performance of National Grid's non-operational land.⁶

Placemaking and host Communities

- C.3 There is an opportunity for the promoter to enable the participatory engagement of host communities in the process of placemaking for the project as a whole and in these locations in particular. Specifically, to go beyond informing and consulting, and, in accordance with the spectrum of public participation (see plan below), involve and collaborate with the relevant communities.

Siting of Transmission Towers, buried cables & Sealing End Compounds

- C.4 Tower locations and Sealing End Compounds and cable corridors should be located to minimise or eliminate permanent adverse impacts on the fabric of the landscape, historic features and landscape character, or ecological features such as trees, hedges, woodlands, wetlands, etc.

⁵ s4.6 Criteria for "Good Design" for Energy Infrastructure

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147380/NPS_EN-1.pdf

⁶https://www.ofgem.gov.uk/sites/default/files/docs/2021/02/final_determination_nget_annex_revised.pdf

- C.5 Tower locations and Sealing End Compounds should be located to minimise or eliminate permanent adverse impacts on visual amenity and the setting of historic assets.
- C.6 Any ecological impacts that cannot be mitigated within the red line area of the development will require effective mitigation elsewhere, as close as possible to the site.
- C.7 Mitigation proposals, and biodiversity and environmental net gain measures, should be climate resilient, and or capable of adaptation to current and emerging climate change impacts.
- C.8 National Grid should seek all opportunities to reinstate landscape features and habitats following the removal of the 132Kv towers.
- C.9 Infrastructure should be located to minimise adverse impacts of noise on public and residential amenity.
- C.10 Tower siting should protect residential amenity. The tower locations should not be overbearing or oppressive on residential amenity.
- C.11 Harm to built heritage assets and their setting should be minimised, substantial harm should be avoided.
 - C.11.a Although the option of tower alignment being closely parallel is generally to be preferred, this may lead to specific impacts that could otherwise be avoided with an alternate siting.
 - C.11.b Detailed discussions on the alignment around Hintlesham Hall have yielded landscape and visual benefits. It is recognised that this approach would not be practicable for the whole of the over ground section of the route, however sensitive areas, for example, the Brett Valley or the setting of the AONB, require a more detailed iterative approach, in the same way as that used at Hintlesham, which tests the engineering possibilities, to minimise the landscape and visual impacts of the development.
- C.12 Cable corridors, tower locations and associated haul and construction access routes should avoid or minimise permanent loss of buried archaeological features.
- C.13 The location of the towers, the buried cable, and other infrastructure such as SEC, should not compromise economic activity along the route, in particular agricultural and horticultural operations. These are an integral part of the local economy and are characteristic land uses that contribute to local distinctiveness.

- C.14 Detailed scheme design should, during both the construction and operational phases, not add to local surface water or fluvial flood risk; or should provide an opportunity to eliminate such additional risks as may be created.
- C.15 Detailed scheme design should achieve acceptable operational site access, and where required temporary construction access that can be reasonably remediated following commencement of site operation.

Cable Corridors, temporary haul routes, and construction access and laydown

- C.16 Cable corridors, associated haul routes and construction access, should avoid, or minimise loss of trees, hedgerows, woodland, and other landscape features, historic landscape character and wildlife.
- C.17 Cable corridors, associated haul routes and construction access should avoid or minimise temporary adverse impacts on public and private amenity in respect of noise, dust, availability of rights of way and other disturbance.
- C.18 Cable corridors, haul routes and construction access should be located and designed in such a way that they are capable of effective restoration.

Design and landscaping of Substations and Sealing end compounds

- C.19 Whilst it is recognised that the design of the majority of the infrastructure for this project will be shaped by engineering necessity, the project promoter should identify any elements that are capable, in principle, of design treatment.
- C.20 The landscape design associated with, the two substations and the four SECs, should seek to integrate them as far as possible into the fabric of the landscape. It is recognised, given the scale of the infrastructure concerned it may not be possible, or appropriate, to fully screen the infrastructure.
- C.21 Landscape design should respond effectively to the character of the site and the receiving landscape, as well as effectively incorporating water management, ecological, archaeological, and public access requirements.
- C.22 Lighting should wherever possible be eliminated or minimised. Where lighting is necessary, light spill and sky glow should be effectively controlled.

D Traffic and Transport (Chapter 12), Detailed Comments, 2023

Full Comments for Chapter 12

Traffic and Transport (including Public Rights of Way)

3.1 Draft Development Consent Order [APP-034]

Part 1: Preliminary

- D.1 Pre-commencement: The Councils are concerned that although these activities are covered by management plans dDCO Requirement 4 (3) it is unclear if the final versions of these plans would be approved before these works start. The Councils are concerned as these activities can generate significant traffic or disruption to the network.
- D.2 “pre-commencement operations” means operations consisting of engineering investigations and surveys, environmental (including archaeological) investigations and monitoring, surveys and monitoring investigations for the purpose of assessing ground conditions, diversion and laying of services, demolition of existing buildings, site clearance, environmental mitigation measures, remediation in respect of any contamination or other adverse ground conditions, *set up works associated with the establishment of construction compounds¹, temporary accesses²*, erection of any temporary means of enclosure or temporary demarcation fencing marking out site boundaries and the temporary display of site notices or advertisements;
- D.3 1: it is unclear what works are required and what transport movements will be generated for these works, for example haulage of aggregate for compound hardstanding.
- D.4 2: It is unclear if temporary means solely for pre-commencement works or if this refers to the temporary access in schedule 8.

Part 2: Principal Powers

- D.5 No Comments.

Part 3: Streets

Article 11: Street Works

- D.6 The Councils would consider that 56 days is a more suitable period for notifying the applicant of any decision in respect to street works, the Councils also consider that this period should be paused if the LHA considers that additional information is reasonably required to make a decision.

Article 13: Application of the 1991 Act (NRSWA)

- D.7 The Councils cannot agree with removing powers under part 56 (power to give direction regarding timing of street works) by undertaking works without the consent of the local highway authority, as this unacceptably fetters its role co-ordinating street works. The Councils would accept this being managed through the street works permit process.
- D.8 The Councils would also find disapplication of Part 73C (materials, workmanship and standard of resurfacing) and section 77 (liability for cost of use of alternative route) if no alternative protective provisions or highways side agreement are agreed. It is noted that whilst article 13 is the same as that in the Sizewell C order 2022 this applicant entered into a deed of obligation that protected the LHA position with regard to these and other matters.

Article 14: Power to alter street layout

- D.9 The statement in (1) 'that the undertaker may, without the consent of the street authority, and for the purposes of carrying out the authorised development, permanently or temporarily alter the layout of, or carry out any works in, a street specified in column (1) of Part 1 or 2 of Schedule 6 (streets subject to alteration of layout) in the manner specified in relation to that street in column (2)' appears to contradict requirement 11 that 'no work to construct, alter or temporarily alter any new or existing means of access to a highway to be used by vehicular traffic may commence until written details of design, layout and reinstatement of that means of access has been submitted to and approved by the relevant highway authority'. The Councils would welcome further clarification to avoid any confusion during the delivery of this project (if consented).

Article 15: Temporary Stopping Up of Streets and Rights of Way

- D.10 The impacts of this are difficult to ascertain as duration or coincidence of the closures or the diversion routes have not been provided. Whilst the local highway authority accepts that diversions should not be a higher standard, nor should they be a lower, unacceptable standard. The Councils would also like to understand what the definition of 'any reasonable time' is with respect to stopping up the highway.

- D.11 The applicant has stated that streets will be temporarily stopped up rather than closed. The Councils would like an explanation as to why the roads cannot be 'closed' to traffic rather than 'stopped up' as the latter implies removal of all highway rights. The Councils note that there has been an ambiguity in recent DCOs, where Sizewell C refers to road closures but East Anglia One (North) to temporary 'stopping up'. In addition, the Councils would like to understand the difference between managed temporary stopped up streets and those that are not managed.
- D.12 The LHA will not accept closure of highways without acceptable diversion routes. For example, the measures in Schedule 7 Part 2 proposing the stopping up of the A1071 (Ipswich Road) between SM-AB-5 and SM-AB-6 without a signed diversion is not considered safe, reasonable or practical. Within Article 15(6) the applicant is not required to provide a higher standard of diversion route than that closed, nor in LHAs opinion should the applicant provide a lesser route as a diversion.
- D.13 The Councils note that on 15(6) the applicant uses 'closed streets' and 'streets of public rights of way to be stopped up' (Schedule 7) as if they are the same. The Councils seek clarification as its understanding is that a 'closed' street or rights of way restricts vehicle rights but protects other highway rights whereas a 'stopped up' street is no longer a public highway.
- D.14 The Councils would consider that 56-days is a more suitable period for notifying the applicant of any decision in respect to an application for consent to close a highway right of way.

Article 16: Access to works

- D.15 The Councils consider that consent for access to works should be given by the local highway authority rather than the local planning authority but should include consultation with the local planning authority. It is also unclear if this power is applicable to accesses that may be required for pre-commencement, the impacts of which may not be included in assessment or covered by management plans.

Article 17: Construction, alteration and maintenance of streets

- D.16 If the LHA is expected to maintain new altered or diverted streets, it should only be where it is in the position to approve the designs and inspect the construction of such works. Failure to do so could result in the public funding shortfalls in design and construction of work adopted as public highway. The LHA reserve the right to collect commuted sums to offset the cost of maintaining additional highway at public cost. Dedication of land as public highway must be subject to an appropriate process of adoption to avoid the local highway authority being exposed to future legal disputes resolved at

public cost. These matters can be agreed through protective provisions or a highway side agreement.

- D.17 In respect to statutory defence (HA 1980 section 58) the local highway authority would consider its Highway Maintenance Operational Plan to be a minimum standard.

Article 18: Agreements with street authorities

- D.18 The Councils welcome inclusion of this article and would strongly recommend that the applicant enter into agreements with the authority to formalise highway issues to avoid disagreement at a later date. This follows the precedent of EA1(N), EA2 and SZC.
- D.19 An example of a highway agreement can be found in the Outline Access Management Plan for the Scottish Power Renewable EA1(N) NSIP.⁷
- D.20 13. Planning Performance Agreement.
- D.21 The Applicant will not undertake any works to any highway or highway asset that is the responsibility of LHA until a Planning Performance Agreement (PPA) has been agreed with the Councils (all parties acting reasonably and in good faith) which will allow the Councils to recover reasonable costs including but not limited to:
- D.21.a Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway;
 - D.21.b Visual and structural condition surveys of the highway (A1094, B1069, B1122, Lovers Lane, Sizewell Gap and parts of A12) and contributions towards structural repairs and is included as mitigation in National Grids Yorkshire Green project;
 - D.21.c Surveys and assessment of highway structures to facilitate AIL movements;
 - D.21.d Damage to the highway (in accordance with the provisions of Section 59 Highways Act 1980);
 - D.21.e Creation of temporary traffic regulation orders (including LHA consultation and issue of permits) and cost recovery for enforcing traffic regulations required specifically for this project

⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005390-8.10%20EA1N%20Outline%20Access%20Management%20Plan.pdf>

- D.21.f Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements; (note this should also include LHA costs to manage structural reviews and strengthening)
- D.21.g Technical approval and inspection of highway accesses (Requirement 16);
- D.21.h and Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PRoW Strategy etc).
- D.22 Notwithstanding the above, the LHA is not unreasonably refused access to inspect or maintain the highway in accordance with its duties under the Highways Act 1980
- D.23 The same project includes a draft s278 agreement.⁸

Part 6

Article 47 Traffic Regulation

- D.24 The applicant should ensure that any traffic regulation is signed to the satisfaction of the local highway authority and chief officer of police (or other enforcing agency noting that in Suffolk parking enforcement has been devolved to district / borough authorities).

Schedule 2 Plans: Part 4: Traffic Regulation Order Plans

- D.25 No comments at this time.

Schedule 3: Requirements

- D.26 Requirement 4: CTMP should be discharged by the local highway authority not the local planning authority (note that (3) refers to discharging requirements not entering into a highway agreement e.g. HA 1980 s278).
- D.27 Requirement 7 constrains some working hours to between 0700 and 1900 on weekdays. This informs the assessment of traffic impacts, but as vehicle movements are not controlled within the management plans nor have the impacts that have been assessed within those hours and so those impacts are not agreed.

⁸ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-004580-ExA.AS-37.D8.V1%20EA1N%20Section%20278%20Agreement%20with%20Suffolk%20County%20Council.pdf>

Schedule 4: Discharge of Requirements

- D.28 SCC as local highway authority would seek specific fees to cover its costs consenting and inspecting highway works. See article 18.

Schedule 5: Streets Subject to Street Works

- D.29 Note: The Councils have not yet checked the schedules against the street gazetteer for accuracy, but notes that significant errors were identified when checking the location of accesses and their description against the street gazetteer.

Schedule 6: Streets subject to alteration of layout

- D.30 Mentions 'white' lines, not road markings which may prevent implementation of parking or other traffic restrictions (i.e., yellow lines)
- D.31 Note: The Councils have checked many of the locations where they are associated with construction accesses. See Annex F.

Schedule 7: Part 1. Streets or Public Rights of Way to be Temporarily Stopped up for which a Diversion is to be Provided

- D.32 If road closures coincide with each other some diversion routes may use the same roads. How will this be managed?

Schedule 7: Part 2. Streets or Public Rights of Way to be Temporarily Stopped up for which no Diversion is to be Provided

- D.33 The Councils question the use of the term 'stopped up' rather than 'road closed'. See comments under article 15.
- D.34 Note: The Councils have not yet checked the schedules against the street gazetteer for accuracy but notes that significant errors were identified when checking the location of accesses and their description against the street gazetteer. See Annex F.

Schedule 7: Part 4: Prohibition of overtaking:

- D.35 The local highway authority are not sure why this is required or will be enforced?

Schedule 8: Access to Works

- D.36 No comments at this time.

Schedule 12: Traffic Regulation Orders

- D.37 Part 1: The proposed parking restrictions are between 7am to 7pm which aligns with the shift patterns but potentially not with AIL movements. Note these will be single yellow lines with signs or traffic cones. The Councils

would question why these are required. In the case of obstruction, this is a criminal act that can be enforced whereas a parking offence is now decriminalised and enforced by the district councils on behalf of the LHA. If parking restrictions are implemented, the Councils would recommend that where these start or end at a junction a distance of 10m from the junction in all directions is covered by the restrictions to ensure compliance with the Highway Code. It is unclear if these restrictions include loading or unloading.

- D.38 Part 3: Temporary Restriction of Movement. One-way movements on the A0171, B1070, B1068, A134, B1508, A131 would be unacceptable to the local highway authority unless implemented overnight with an acceptable diversion.
- D.39 Note: The Councils have not yet checked the schedules against the street gazetteer for accuracy but notes that significant errors were identified when checking the location of accesses and their description against the street gazetteer.
- D.40 Speed Limits: SCC's policy on permanent speed limits can be found on the SCC webpage,⁹ although it is noted the proposals are for temporary limits.

Schedule 14: Protective Provisions

- D.41 The Councils are seeking either protective provisions or suitable side agreements to ensure that its role as the highway authority is not compromised. Side agreements are an accepted part of recent DCOs (e.g., Sizewell C, EA1(N), EA2, Sunnica).

Drawings

2.11.12 Design and Layout Plans: Temporary Bellmouth for Access:

- D.42 Visibility splays can easily be misinterpreted from drawings. Manual for Streets¹⁰, and the Design Manual for Roads and Bridges (accessed from the Standards for Highways website) clearly show how visibility splays shall be defined. SCC's position on acceptable visibility criteria can be found as Appendix F in the Suffolk Design Guide.¹¹
- D.43 The Councils note that the bellmouth drawing [APP-030] is very generic and makes no allowance for the nature of the existing highway. The plan in isolation does not show that the accesses proposed by the applicant are feasible or deliverable nor what impacts there will be in terms of vegetation

⁹ <https://www.suffolk.gov.uk/asset-library/imported/speed-limit-policy.pdf>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex_Manual_for_Streets_Redacted.pdf

¹¹ <https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf>

clearance. SCC publishes access drawings¹². However, whilst generic drawings can provide some construction information, it is the Councils experience that each access has to be designed for its specific location.

- D.44 No swept path analysis to show that the junction is suitable for the largest anticipated vehicle has been provided noting this is also dependant on the width of the existing road. Nor have the junctions on the access routes been assessed for suitability for construction vehicles, if any improvements are required and if these can be delivered within the highway boundary.
- D.45 Layers are usually stepped rather than sloped. Nor would the construction be practical for placing a geotextile on a slope as shown (section B-B). Without some form of transverse edge restraint, the transition from bound to unbound pavement in section C-C is likely to deteriorate quickly.
- D.46 The use of AC 20 material may be acceptable for short duration use but as it is not designed as a surfacing material lacks surface texture and skid resistance whilst being prone to fretting or spalling due to weather and traffic.
- D.47 Position of gates needs to be shown. These are usually located an appropriate distance from the highway so that the largest type of vehicle likely to use the junction can safely pull entirely off the highway. For the same reason gates should open into the site.
- D.48 No details are given regarding levels and / or drainage. Appropriate drainage shall be provided to avoid water, mud or other debris flowing or being trafficked onto the highway.
- D.49 Highway boundary details are required where the order limits do not include the highway to avoid a requirement for visibility splays to be across third party land.

2.11.14 Design and Layout Plans: Temporary Culvert for Access [APP-032]

- D.50 Pipe surround should be specified. Usually at least the bed should be self-compacting.
- D.51 Note that consent from the LLFA will be required for permanent or temporary culverting of ditches.

¹² <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/standard-drawings>

Substation and Sealing compound Access

2.11.1 Design and Layout Plans: Grid Supply Point Substation Layout [APP-019]

D.52 Shows an outline of an access at large scale but no details such as width, visibility, or construction materials are provided. Therefore, the LHA cannot comment on the feasibility, deliverability or acceptability of these proposals.

2.11.2 Design and Layout Plans: Grid Supply Point Substation Elevations [APP-020]

D.53 No comments at this stage.

2.11.3 Design and Layout Plans: Grid Supply Point Substation Single Circuit Cable Sealing End Compound [APP-021]

D.54 No comments at this stage.

2.11.5 Design and Layout plans: Dedham Vale East Cable Sealing End Compound [APP-023]

D.55 No comments at this stage.

2.11.7 Design and Layout Plans: Stour Valley East Cable Sealing End Compound [APP-025]

D.56 No comments at this stage.

2.11.8 Design and Layout Plans: Stour Valley West Cable Sealing End Compound [APP-026]

D.57 No comments at this stage.

5.7 Transport Assessment [APP-061]

National Guidance

D.58 Section 3.2 includes the policy review, whilst understandably not referenced due to the timing of its release; there is currently an ongoing consultation on the National Policy Statements. Within the EN-1 Consultation documents is enhanced consideration that needs to be given towards sustainable transport, as set out at paragraphs 5.14.7 and 5.14.21. Within EN-5, paragraph 2.5.1 is considered to be important in outlining the projects potential to improve the connection between people and the environment.

D.59 “When planning and evaluating the proposed development’s contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance

set out in EN-1 (Section 4.5) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:

- D.59.a reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or
 - D.59.b connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements”
- D.60 The Councils note the applicant does not refer to NPS EN-1 5.13.10: ‘Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective’

Local Guidance

- D.61 The Councils would refer the applicant to additional local guidance relevant to the project.
- D.61.a Local Transport Plan Part 1 (included by the Applicant)
 - D.61.b Local Transport Plan Part 2
 - D.61.c SCC Travel Plan Guidance
 - D.61.d Green Access Strategy (Rights of Way Improvement Plan)
 - D.61.e Suffolk Local Cycling and Walking Infrastructure Plan
 - D.61.f Babergh & Mid Suffolk District Councils’ Local Cycling and Walking Infrastructure Plan
 - D.61.g Suffolk Cycling Strategy
 - D.61.h Highways Operational Plan
 - D.61.i Highways Asset Management Plan
 - D.61.j Speed Limit Policy
 - D.61.k Suffolk Design: Streets Guide
 - D.61.l National Bus Strategy in Suffolk
- D.62 See also Table D1: Comments on Assumptions made in the Transport Assessment.
- D.63 Paragraph 2.3.1 references the core working hours for construction and Requirement 7 of the draft DCO; this requirement sets out the maximum working hours and does not control the working hours within the 12-hour period to those assessed within the Transport Assessment. This is

particularly important when considering the impacts in the assessed peak hours (12.5% of staff traffic) and how this materially impacts on the conclusions reached. The assessment of impacts on the basis of these shift patterns is not agreed.

- D.64 It is understood from comments made by the applicant in ISH1 that the term worker includes all staff such as those officed based or visiting the site who are unlikely to arrive and depart in accordance with the shift pattern.
- D.65 Paragraph 2.5.1 sets out that the Transport Assessment is based on the construction schedule at ES Appendix 4.2 [APP-091]. This schedule affects the conclusions around the impacts of construction traffic, as the details provided are exceptionally limited and no information that shows the relationships between construction activities and construction vehicle movements is provided; this cannot be checked.
- D.66 Paragraph 5.2.1 identified that growth was forecast using TEMPRO, at a high level this is considered reasonable; however, there is concern that if further assessment is needed at specific junctions, particularly those at west Ipswich of the A1214 / A1071 and B1113 then further consideration of the specific impacts of large scale development in that area, most notably Wolsey Grange, may need to be undertaken.
- D.67 Whilst it is recognised that limited information is available, the absence of consideration of impacts of East Anglia Green does mean that the potential exists for unassessed impacts, particularly if the works were to slip by 12 months.
- D.68 Paragraph 6.2.5 identifies the staff requirements. These assumptions are not accepted. No evidence is submitted to support these assumptions around staff numbers; nor any proposed controls to limit the numbers to those assessed. It is indicated that the peak staff will be 350 and the average 180.
- D.69 Paragraph 6.2.8 sets out the assumptions on construction vehicle forecasts. There are concerns with how these assumptions may have impacted the assessment, and they are not accepted. Particularly that the shift patterns will remain consistent across the year, which results in limited peak hour impacts and that no data is provided that evidences the construction projects traffic generation, nor importantly any controls committed to that limit, which is discussed much further in our comments on [APP-180] Construction Management Plan. As no data is provided, the use of 12.5% uplift on construction, whilst welcome, is difficult to comment on its potential to address variation. No data is provided that evidences the flat profile of construction vehicles across the day; other major construction projects for

which evidence has been submitted have indicated greater levels of movement in the morning than the evening.

D.70 Paragraph 6.2.9 provides a summary on the assumptions within the assessment on staff construction vehicles. There are strong concerns with how these assumptions may have impacted the assessment and the conclusions on this basis are not accepted. Particularly that the shift patterns will remain consistent across the year, which results in limited peak hour impacts and that no data is provided that evidences the construction projects traffic generation. The assessment is based on 70% of staff travelling between the site and overnight accommodation by minibus (four staff members per minibus), and there is no evidence that supports this assessment method nor is any commitment included to achieve this form of mode share, which is discussed much further in our comments on [APP-180] Construction Management Plan. There is no evidence that supports the distribution of staff vehicles. The staff arrival profile relies on only 12.5% of staff arriving or departing in the peak hours; as a result of this the development impacts are very limited with 528 staff resulting in 32 peak hour vehicle movements. There are two important points here:

D.70.a No evidence has been submitted that supports this breakdown nor any controls proposed that would limit these impacts

D.70.b However, if there are only 32 vehicles in the network peak hours but the adjacent hour has 50% of vehicles, then this is the hour that should have been assessed.

Car Occupancy

D.71 The Councils have significant recent experience of DCO applications submitting significant levels of car share, but failing to evidence that these levels are achievable, without strong management initiatives, in a rural setting.

D.72 It is difficult to corroborate the figures provided at Table 6.1 and Table 6.2 of the Transport Assessment with the outputs shown on Figure 7 for Traffic Flow diagrams. This is partly because of the merging of LGV movements with staff vehicle movements; however, the number of peak hour HGVs on the traffic flow diagram is 40, whilst Table 6.2 indicates 35. It would be beneficial if greater clarity was provided by the Applicant on this. With such uncertainty, the Councils would also recommend that the numbers of vehicles assessed is included as a cap to clarify this matter and provide conformation that the assessed values will not be exceeded.

Calculation of transport movements

- D.73 The application does not include details of how the numbers of movements have been calculated to enable the authority to review these calculations and examine the sensitivity of the numbers to change, such as concentration of the construction program or coincident of a number of activity peaks. A key principle of the application is that the final construction details will only be known once a contractor is appointed. Therefore, it is imperative that controls are placed on vehicle movements to ensure that these do not exceed those assessed in the ES and TA
- D.74 It would have been helpful to the Councils to see a daily profile of construction traffic to better understand the impacts on the local network. A cumulative total of HGVs would also assist in considering the potential impacts on the structural condition of local highway.

Capacity Modelling

- D.75 Section 6.3 and 7.3 provides details on the junction capacity assessment methodology, given that the Councils do not agree with the elements of determining the development impact, it is not possible to comment on the junction modelling method particularly given that there could potentially be far more locations where an impact of 24 vehicles would occur, as used as part of the sifting process at the Applicant's Step 1. The Capacity assumptions include that the width of the major road is 6m which may not be the case even on A roads (see Annex E).
- D.76 As the assessment method is not agreed, the conclusions on impacts on the bus network as set out at Section 7.4 cannot be agreed.

Road Safety

- D.77 The applicant has examined the collision history of the local road network focussing on clusters, but as shown at Transport Assessment Appendix A paragraph 1.3.1, this is one of a number of assessment tools. In the Councils opinion it would be more relevant to assess the routes to see if collisions exceed national averages for similar roads or show specific groups are more vulnerable. Methodology similar to the Road Safety Engineering Manual (2007 4.1.4) may be appropriate and was accepted during the EA1(N) examination see 26.5.4 of the Environmental Statement Chapter 26 Traffic and Transport.¹³
- D.78 Areas of concern to the Councils are:

¹³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-001378-6.1.26%20EA1N%20Environmental%20Statement%20Chapter%2026%20Traffic%20and%20Transport.pdf>

- D.78.a A1071 from the Beagle Roundabout to the east of the bends near Hintlesham Hall including a potential cluster near the junction of the A0171 and the Timperleys in Hintlesham
- D.78.b A1071 Hadleigh Bypass including the Aldham Mill Hill and A1141 junctions
- D.78.c A134 / B1187 Bear Street junction in Nayland

D.79 Appendix C: Traffic and PROW Assumptions provides a long list of the assumptions that inform the assessment, these have been provided in tabular format below along with the Council’s comments and requirements to address:

Table D1: Comments on Assumptions made in the Transport Assessment		
<p>General Assumptions for Construction Traffic Routing</p> <p>The construction routing has been identified using basic principles, for example assuming trips would be as direct as reasonably practicable between identified access points and the nearest junction on the SRN, avoiding as far as reasonably practicable the following:</p>		
Applicant	Council Comments	Council Requirements to Address
<p>High sensitivity receptors, including Dedham Vale AONB, town centres (e.g. Hadleigh and Sudbury), Sudbury Air Quality Management Area and Protected Lanes;</p>	<p>The broad methodology for identifying construction routes appears reasonable, subject to specific details. There are no controls nor Council approval process within the management plans to restrict the Applicant to these construction routes. Routing of construction vehicles and accesses for pre-commencement works shall also be considered. See also Annex F for comments on specific routes.</p>	<p>Construction vehicle routes to be agreed with the relevant highway authorities, with appropriate monitoring, reporting and enforcement processes within the CTMP. CTMP or other management plan should control pre-commencement works</p>
<p>Sections of road susceptible to traffic collisions;</p>		
<p>Very narrow rural roads, which are unsuitable for HGV;</p>		
<p>Roads with sharp bends that large vehicles would struggle to negotiate;</p>		

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Roads with signage indicating height, weight, and width restrictions. This has been considered when developing the construction and staff routing; and		
ALL routes have been assumed to be suitable for the use of HGV and may change depending on the delivery port for the cable drums.	ALL routes have not been agreed with SCC. However, this should not affect HGV (non-AIL) routes subject to not structural issues being identified when assessing the AIL routes.	Applicant to provide information to show a feasible AIL route from a port to the site(s) including structural assessment and swept path analysis at junctions.
Assumptions for Construction Staff Numbers		
Applicant	Council Comments	Council Requirements to Address
Numbers estimated using knowledge of how many workers are required for construction activities based on other National Grid projects;	No evidence is submitted to verify these numbers, such as monitoring of other projects. No commitment is given to limiting these numbers to those assessed.	Control on total workers to assessed numbers. To be monitored and reported.
Both sections of the underground cable route would be constructed in parallel and it is typically assumed that the workers would commence both ends of the underground sections and work in towards the middle of the cabling section; and	No evidence is submitted to show that this is a reasonable assumption. Nor any information provided on potential implications to the assessment as a result of shorter working week.	Implications on construction schedule to be provided.
Working areas would be operational seven days a week and that construction workers and staff would be on site seven days a week. Staff working patterns are assumed to be twelve days on and two off.	No evidence is submitted to show that this is a reasonable assumption. Nor any information provided on potential implications to the assessment as a result of shorter working week.	Control on total workers to assessed numbers. To be monitored and reported.
Assumptions for Construction Vehicle Numbers		

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Applicant	Council Comments	Council Requirements to Address
<p>Quantities of materials are based on designs shown on General Arrangement Plans (application document 2.10). Additional materials may be required as a result of required special engineering requirements identified during detailed design once a Main Works Contractor is appointed;</p>	<p>No evidence is submitted to verify material requirements, nor supporting assumptions, nor how these have been equated to vehicle numbers.</p>	<p>Controls, monitoring and reporting on total HGV numbers.</p>
<p>All HGV number and LGV numbers have been counted from H-AP 20 and would then use the temporary access route off the A131 to access the western side of Section G: Stour Valley;</p>	<p>There are no controls nor Council approval process within the management plans to restrict the Applicant to these construction routes.</p>	<p>Construction vehicle routes to be agreed with the relevant highway authorities, with appropriate monitoring, reporting and enforcement processes within the CTMP.</p>
<p>Roads with signage indicating height, weight, and width restrictions. This has been considered when developing the construction and staff routing;</p>		
<p>HGV crossings between two opposite access points on the LRN have not been considered as HGV movement numbers;</p>	<p>No Comment</p>	<p>No Further Action</p>
<p>Temporary access routes in the cable sections and for the temporary access route off the A131 are assumed to be 7m wide and have a 0.3m depth of stone cover. New overhead line sections are assumed to require a 4m wide and have a 0.3m depth of stone cover. The temporary access route would also require passing bays which are assumed to be 2m wide x</p>	<p>Whilst an off-highway activity any changes in this assumption can significantly affect the number of HGV movements associated with the activity. In a similar way the choice / practicality of the type of HGV has a similar impact. If the applicant has assumed deliveries solely by</p>	<p>Applicant to provide more detail regarding calculation of HGV movements. Controls on HGV movements</p>

<p>20m long every 150 metres. It is assumed that each pylon may require a stone working area / piling pad, which is assumed to be 25m x 25m x 0.5m. Construction compounds are based on 50m x 50m stoned areas. It is assumed that 20 tons of stone would be delivered by a single HGV;</p>	<p>articulated vehicles SCC would consider this to be an underestimate as such vehicles would struggle to access many locations.</p>	
<p>It is assumed that access for the 132kV overhead line removal would use a mixture of existing farm tracks and trackway panels to gain access to the working area;</p>	<p>Risk remains that if this is not the case and additional haul roads are needed this will increase the number of HGV movements</p>	<p>Controls on HGV movements</p>
<p>It is assumed that overhead line conductor drums and steelwork would be delivered on 38-ton articulated lorries with each vehicle carrying four or five overhead line conductor drums;</p>	<p>These loads will be AILs. Refer to comments under TA</p>	<p>Applicant to prove feasible route from port to site access</p>
<p>The HGV movements include the reasonable worst-case assumption that piling is required at each pylon and CSE compound;</p>	<p>Accepted. But see notes on calculator of movements</p>	<p>Controls on HGV movements</p>
<p>LGV movements includes security provision, servicing welfare units and delivery of small tools and plant;</p>	<p>No Comment</p>	<p>No Action</p>
<p>Allowance has been made each month for deliveries to each area for maintaining welfare, security provision and</p>	<p>No Comment</p>	<p>No Action</p>

<p>maintenance. This would include three weekly visits for:</p> <ul style="list-style-type: none"> — Delivery of fresh water; — Cleaning of welfare facilities and removal of effluent; and — Re-fuelling of welfare units. 		
<p>A reasonable worst-case assumption has been made in the event that excess sub-soil needs to be taken offsite where this is displaced by pylon foundations and cannot be reused in situ. The HGV movements assume that 20-30m³ would be generated at each pylon location;</p>	<p>Accepted. But see notes on calculator of movements</p>	<p>No Action</p>
<p>It is assumed that water required for the trenchless crossings would be delivered to the site in tankers;</p>	<p>No Comment</p>	<p>No Action</p>
<p>It is assumed at present that the cable drums would be stored at a local port and transported in small batches to the main site compound and the relevant cable section; and</p>	<p>No Comment</p>	<p>No Action</p>
<p>Vehicle numbers associated with surveys are not included in the construction vehicle numbers as it is assumed that these would be carried out in advance of construction.</p>	<p>No Comment</p>	<p>No Action</p>
<p>Lane closures and temporary traffic management may be required during the construction and removal of the access points and bellmouths on B Roads and</p>	<p>Few details on likely duration or a program to identify any conflicts has been provided. Schedule 7 part 2 includes a</p>	<p>Timing of road closures and diversion routes to be agreed with the LHA</p>

<p>above. Smaller roads may require full closure with diversion routes provided where practicable. In both cases, works are assumed to take approximately two weeks during site set up, and a similar duration at the end to reinstate the bellmouth to the previous condition;</p>	<p>number of roads including the A1071 for which diversions are not provided.</p>	
<p>Assumptions for PRow Network</p>		
<p>Applicant</p>	<p>Council Comments</p>	<p>Council Requirements to Address</p>
<p>It is assumed that where a PRow is identified as being 'stopped up managed' on the Access, Rights of Way and Public Rights of Navigation Plans (application document 2.7) that the PRow would generally remain open except for very short durations of up to one day when closure would be required to maintain safety to members of the public and the workforce. For those PRow which would need to be managed by a closure and a temporary diversion, reasonable alternative routes have been identified</p>	<p>No Comment</p>	<p>No Action</p>
<p>The PRow assessment is based on the Proposed Alignment, which is the design that is shown on the General Arrangement Plans (application document 2.10) and a schedule that has been provided (setting out the proposed durations and methods for management of PRow within the Order Limits (Appendix F: PRow Diversions) based on the Proposed Alignment and construction assumptions. Based on this information, none of the PRow would require a long-term closure or diversion.</p>	<p>Accepted but requirement of details of timings and full duration of closures required.</p>	<p>Applicant to provide more detail on duration of closures.</p>
<p>Assumptions Used within the Transport Assessment for construction vehicle forecasts</p>		

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Applicant	Council Comments	Council Requirements to Address
There is no change in the number of daily working hours during summer/winter;	There is no evidence provided to suggest that this is a realistic assumption.	Controls on working hours or assessment of alternative hours for highway impacts.
Inbound construction vehicles making deliveries to site would generate an empty outbound vehicle trip along the same route in the same hour;	Some potential exists for impacts in adjacent hours; although this is somewhat irrelevant given the flat profile assessed so far.	Evidence provided on how reasonable a flat profile is for construction vehicles.
Outbound construction vehicles removing materials from site would generate an empty inbound vehicle trip along the same route in the same hour;	Some potential exists for impacts in adjacent hours; although this is somewhat irrelevant given the flat profile assessed so far.	Evidence provided on how reasonable a flat profile is for construction vehicles
Analysis of construction traffic generation in the three months before and after the peak construction month (August 2025) has been undertaken, and the highest monthly forecast at each access point in this seven-month period has been used in the assessment to capture the potential impact of any programme slippage;	No evidence has been provided of link between construction activities and vehicles, nor how this has been reflected in the assessed 7-month crossover peak period, nor how these impacts will be controlled.	Controls, monitoring and reporting on total HGV numbers.
An uplift of 12.5% has been applied when converting monthly construction traffic estimates to daily estimates, to allow for some variation in the timing of deliveries and removals from construction sites;	As assessment appears to be quarterly, no evidence has been submitted that shows that a 12.5% uplift factor above the average day for each activity is reasonable across a quarter.	Controls, monitoring and reporting on total HGV numbers.
To allow for some variation in the number of trips in each hour, the daily profile has been divided by 11 (noting that core	No evidence is provided that indicates a flat profile is reasonable nor that a 12 hour working day is reasonable especially given	Evidence on profiles to be provided.

working hours cover a 12-hour period); and	single shift pattern. Evidence from recent DCOs suggests greater movements in the morning.	
Construction impacts on the SRN have assumed that all construction traffic is routed in the same direction as the DfT traffic count location as part of a reasonable worst-case assessment.	No Comment	No Action
Assumptions Used within the Transport Assessment for staff vehicle forecasts		
Applicant	Council Comments	Council Requirements to Address
There is no change in the number of daily working hours during summer/winter;	There is no evidence provided to suggest that this is a realistic assumption.	Controls on working hours or assessment of alternative hours for highway impacts.
Construction staff vehicles would be parked within site compounds and would therefore not be parked on the public highway. This means that no empty staff vehicle movements are assumed to occur, in contrast to the assumptions for construction vehicles as set out above;	Accepted subject to effective monitoring and enforcement	Monitoring. Reporting and enforcement of inappropriate parking to be included within CTMP
Analysis of the daily peak staff requirement in the three months before and after the peak construction month (August 2025) has been undertaken, and the highest forecast at each construction site in this seven-month period has been used in the assessment to capture the potential impact of any programme slippage;	No evidence has been provided of the link between construction activities and vehicles, nor how this has been reflected in the assessed 7-month crossover peak period, nor how these impacts will be controlled.	Controls, monitoring and reporting on total staff vehicle numbers.

<p>70% of staff would travel between their overnight accommodation and the construction sites by crew minibuses. A crew minibus would have an average occupancy of four members of staff for each trip;</p>	<p>There is no commitment within the CTMP to achieve these proportions for staff workers.</p>	<p>Include appropriate targets, monitoring and controls within the CTMP.</p>
<p>30% of staff would travel between their overnight accommodation and the construction sites in cars. Each car would have an average occupancy of one member of staff for each trip;</p>	<p>No Comment</p>	<p>No Action</p>
<p>Overnight accommodation for 80% of all staff is assumed to be located in Ipswich, with 10% in Braintree, 5% in Sudbury, and 5% in Hadleigh;</p>	<p>No evidence is submitted to support this assumption over staff origins.</p>	<p>Applicant to provide evidence.</p>
<p>The following staff arrival profile has been used to convert daily vehicle trips to hourly inbound trips in the morning peak:</p> <ul style="list-style-type: none"> — 25% arrive in the hour before core working hours (0600 – 0700); — 50% arrive in the 30-minutes following the commencement of core working hours (0700 – 0730); — 25% arrive in the following hour (0730 – 0830); — This results in an assumption, based on an even distribution between 0730 and 0830, that 12.5% of staff would arrive in the baseline morning peak hour (0800 – 0900); 	<p>No evidence is submitted to support this assumption over staff arrival patterns. This has a significant impact on the assessed hour within the Transport Assessment, and on the hour of greatest change within the Environmental Statement, although this has not been assessed by the Applicant.</p>	<p>Agree new assessment methodology with the highway authority to reflect greatest impact.</p>

<p>A similar profile has been used to convert daily vehicle trips to hourly outbound trips in the evening peak:</p> <ul style="list-style-type: none"> — 25% depart between 1730 and 1830; — 50% depart in the 30-minute period leading up to the end of core working hours (1830 – 1900); — 25% depart in the hour after the end of core working hours (1900 – 2000); and — This profile would mean that no staff are travelling during the baseline evening peak hour (1600 – 1700). However, to undertake a precautionary assessment it was assumed that 12.5% of construction staff vehicles would be making outbound trips during the evening peak hour, similar to the inbound assumption during the morning peak hour. 	<p>No evidence is submitted to support this assumption over staff arrival patterns. This has a significant impact on the assessed hour within the Transport Assessment, and on the hour of greatest change within the Environmental Statement, although this has not been assessed by the Applicant.</p>	<p>Agree new assessment methodology with the highway authority to reflect greatest impact.</p>
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D.80 The assessment is built on a large number of assumptions without evidence or controls that support those assumptions, and so it is impossible to agree with the conclusions reached.

6.2.12 Environmental Statement Chapter 12 Traffic and Transport [APP-080]

D.81 Paragraph 12.4.11 and paragraph 12.4.12 references traffic count surveys that have been undertaken. No outputs from these surveys have been provided, and as they form the basis for the conclusions of the assessment; those conclusions cannot be agreed. Speed surveys at access locations would aid decision making when considering the design of the access, particularly the visibility splays.

D.82 Paragraph 12.4.20 refers to the ES Appendix 4.2: Construction Schedule [APP-091]. This schedule impacts on the conclusions regarding the impacts of construction traffic, as the details provided are exceptionally limited and no information that shows the relationships between construction activities and construction vehicle movements is provided; this cannot be checked.

- D.83 Paragraph 12.4.21 references the core working hours for construction and Requirement 7 of the draft DCO; this requirement sets out the maximum working hours and does not control the working hours within the 12-hour period to those assessed within the Environmental Statement. This would particularly impact any assessment of the hour of greatest change, but this assessment has not taken place. The assessment of impacts on the basis of these shift patterns is not agreed.
- D.84 Paragraph 12.4.26 refers to a peak staff number of 350 and an average of 180. There are no controls on this assumption, and so it is not agreed. As a result the potential exists for construction traffic impacts to exceed those assessed.
- D.85 Paragraph 12.4.29 sets out that the sensitivity of the receptors is based on DRMB LA112. The Councils have previously raised concerns regarding the use of DMRB LA 112 and do not fully agree with the methodology, as the document is designed to assess the impact of trunk roads. The Summary at the beginning of LA 101 (produced in July 2019) states the following:
- D.86 *“This document sets out the over-arching requirements and principles that form an introduction to the environmental assessment of motorway and all-purpose trunk roads.”*
- D.87 LA 112 also includes the statement:
- D.88 *“This document provides a framework for assessing, mitigating and reporting the effects of motorway and all-purpose trunk road projects on population and health. It introduces significance criteria that aid consistent and proportionate assessment to support the reporting of significant effects of population and human health.”*
- D.89 Again, the statement reiterates that the method has been developed for motorway and all-purpose trunk road projects. No information is provided on how the environmental categories that have been determined, and what evidence base has been used to support the method of assessment. However, at a high level the methodology for determining receptor sensitivity does not appear unreasonable when looking at the consideration of receptors: but, there are concerns when considering that only locations without footways can be considered high sensitivity, and only locations with narrow footways would be categorised as medium sensitivity. This does not reflect other recent DCOs. That being said all locations need to be considered at a local level on a case-by-case basis, and so the Councils will look to identify those locations where we disagree with the Applicant and where it materially impacts on outcomes rather than cause delay by debating the idiosyncrasies of methodology. The Councils have previously requested that a plan be provided showing the link sensitivities; and this has not been

provided making any review very difficult and the potential for confusion and misunderstanding more likely.

- D.90 Paragraph 12.4.31 identifies the criteria used for assessing impacts on WCH journey length; again, these are based on LA 112 which presents concerns to the Councils.
- D.91 Paragraph 12.4.34 sets out the methodology used for assessing severance. However, as this is only applied to the downgrading of severance, and it remains somewhat unclear how increases in severance have been assessed; albeit it is assumed from [APP-134] Appendix 12.1 Traffic and Transport Significance Effects Tables that anything lower than 30% has been treated as small and anything lower than 15% as negligible. As a high-level rule this does not appear unreasonable, again noting that it would need to be considered on a case by case basis.
- D.92 Paragraph 12.4.43 provides a summary on the assumptions within the assessment on construction vehicles. There are concerns with how these assumptions may have impacted the assessment. Particularly that the shift patterns will remain consistent across the year, which results in limited peak hour impacts and that no data is provided that evidence the construction projects traffic generation, nor importantly no controls committed to that limit the impacts, which is discussed much further in our comments on Construction Management Plan [APP-180]. As no data is provided, the use of 12.5% uplift on construction, whilst welcome, is difficult to comment on its potential to address variation.
- D.93 Paragraph 12.4.44 provides a summary on the assumptions within the assessment on staff construction vehicles. There are concerns with how these assumptions may have impacted the assessment. Particularly that the shift patterns will remain consistent across the year, which results in limited peak hour impacts and that no data is provided that evidence the construction projects traffic generation. The assessment is based on 70% of staff travelling between the site and overnight accommodation by minibus (four staff members per minibus), and there is no evidence that supports this assessment method nor is any commitment included to achieve this form of mode share, which is discussed much further in our comments on Construction Management Plan [APP-180].
- D.94 The assessment undertaken is purely based on daily traffic and not on the hour of greatest change. The Councils do not agree with this approach. The Guidelines for the Environmental Assessment of Road Traffic set out that the detailed assessment of impacts is therefore likely to concentrate on the period during which the absolute level of impacts is at its peak, as well as the hour at which the greatest level of change is likely to occur. As the most

significant impacts occur in one-hour periods, the assessment of a 24-hour period significantly reduces the proportional change in traffic. The need to undertake an assessment of the hour of greatest change is consistent with other recent DCOs.

- D.95 The assessment does not take into consideration the impact of delays associated with any traffic management. Nor is this assessed in combination with other impacts to severance such as repeated PRow closures. It would be beneficial if a plan showing the total transport network closures is provided and the length of the closures to give an indication of the scale of the impact, which is currently very unclear.
- D.96 The Councils are also concerned about the impact of repeated closure and disruption to the highway and rights of way network recently and planned for the future. Particularly around the Bramford area there have been rights of way closures associated with EA1, EA3 and shortly this project and Norwich to Tilbury. Such disruption reduces the value of the rights of way network in the long term by discouraging users.
- D.97 In summary, the Councils have the following concerns with the environmental assessment of road traffic.
- D.97.a The traffic survey data has not been provided.
 - D.97.b No evidence is provided that supports the construction traffic figures assessed.
 - D.97.c No agreement has been reached on the sensitivity of receptors assessed.
 - D.97.d There are no controls on HGV movements to assessed figures.
 - D.97.e There are no controls on staff vehicle movements to assessed figures.
 - D.97.f There is no commitment to achieve the assessed modal split.
 - D.97.g The assessment does not include an assessment of the hour of greatest change.
 - D.97.h The assessment does not consider the impact of repeated traffic management on the highway network in terms of severance and driver delay.

6.2.12 Environmental Statement Chapter 15 Cumulative Effects Assessment [APP-083]

- D.98 Paragraph 15.4.14 references the consideration that a cumulative effect is only considered *where both a spatial and temporal overlap exists*. On this basis repeated staggered impacts on the transport network as a result of traffic management, closures to PRow, and road closures would not be considered a cumulative impact in spite of their repeated impact on users.
- D.99 Paragraph 15.4.37 identified that growth was forecast using TEMPRO, at a high level this is considered reasonable; however, there is concern that if further assessment is needed of the junctions at west Ipswich of the A1214 / A1071 and B1113 then further consideration of the specific impacts of large-scale development in that area, most notably Wolsey Grange, may need to be undertaken.
- D.100 Paragraph 15.6.9 concludes for traffic and transport that there would not be a significant inter project cumulative effect on amenity as there would be no significant effects on the local road network, including delays and congestion and on PRow due to closures. As the Councils do not agree with the assessment method, we disagree with the conclusion. There are particular concerns around the frequency and scale of closures and in particular temporary severance of the wider PRow network.

6.3.4.2 Environmental Statement Appendix 4.2 Construction Schedule [APP-091]

- D.101 Whilst helpful in showing which elements of the project would potentially be delivered commensurately, no details are provided within the schedule that link construction works to construction vehicle or staff numbers, which would have allowed the quoted figures to be at least partially reviewed. There is also some concern that, as the assessment is based on quarterly activities, there is significant scope for variation on the assessed impacts.

6.3.4.2 Environmental Statement Appendix 5.4 Assessment Criteria [APP-096]

- D.102 Table 1.1 provides details on the assessment of receptor sensitivity, with regards to construction routes. At a high level the methodology for determining receptor sensitivity does not appear unreasonable when looking at the consideration of receptors, however, there are concerns when considering that only locations *without footways* can be considered high sensitivity, and only locations with narrow footways would be categorised as *medium* sensitivity. This does not reflect other recent DCOs. The Councils do not agree with the method. That being said all locations need to be considered at a local level on a case-by-case basis, and so the Councils will

look to identify those locations where we disagree with the Applicant and where it materially impacts on outcomes rather than get bogged down in the idiosyncrasies of methodology.

- D.103 Table 1.2 provides details on the assessment of magnitude of impacts. With regards to change in severance, there is very limited detail on how judgements have been made on changes, albeit it is assumed from *Appendix 12.1 Traffic and Transport Significance Effects Tables* [APP-134] that anything lower than 30% has been treated as small and anything lower than 15% as negligible. As a high-level rule this does not appear unreasonable, again noting that it would need to be considered on a case-by-case basis.
- D.104 Whilst, with regards to change in pedestrian amenity, fear and intimidation, as a high level starting point the method used does not appear unreasonable; again, noting that it would need to be considered on a case by case basis. The Councils are particularly concerned of any points where a small change in impact would result in a higher categorisation e.g., an increase from 28% to 30%.

6.3.4.2 Environmental Statement Appendix 12.1 Significance of Effects Tables [APP-134]

- D.105 Section 3 provides details on the assessment of severance. As previously requested, a plan would have made reviewing the sensitivity of links much simpler, and would be beneficial.
- D.106 Limited detail is provided on why certain changes in traffic flows are categorised with the magnitude of impact identified; and further information on this would be beneficial to understanding the professional judgment used.
- D.107 Section 4 provides details on the impacts on amenity and fear and intimidation; given the majority of impacts are minor or neutral as a result of traffic changes, agreement on sensitivity is of limited value; however, as the Tables do not include an assessment of the hour of greatest change; this might affect any conclusions reached.

6.3.15.5 Environmental Statement Appendix 15.5 Inter Project Cumulative Effects Assessment [APP-140]

- D.108 When considering traffic and transport cumulative effects with the East Anglia Three, the A120 Widening scheme and the East Anglia Green projects, the Applicant has reached the conclusion that any impacts are limited due to the Applicant's assessed impacts in the peak hours. As the assessment method is not agreed this conclusion cannot be agreed. There

is some potential for increases at Strategic Road Network junctions in particular as a result of the numerous projects in the area.

- D.109 The potential for a cumulative effect as a result of the Norwich to Tilbury (was East Anglia Green) project is dismissed due to the project's peak being two years prior to the anticipated start date for Norwich to Tilbury. Dismissal on this basis is not agreed, as it does not take into account any slippage in the project's programme, nor has any evidence been submitted that associated the programme with construction traffic, which might give some indication of potential overlap.

7.6.1 Draft Statement of Common Ground

- D.110 As Per ID 3.8.3, the Councils do not agree with the methodology used for assessing the impacts, which has been set out in detail within this response.
- D.111 As per ID 3.13.11, the Councils do not agree with the methodology, commitment and measures set out in the Construction Traffic Management Plan.

7.5.1 CEMP Appendix A Code of Construction Practice [APP-178]

- D.112 Good Practice Measure TT02 sets out that the contractor would be required to install GPS tracking on the Heavy Goods Vehicles to check for compliance with the authorised construction routes.
- D.113 It appears that those authorised construction routes would be agreed between the Applicant and the contractor without input or scrutiny by any other stakeholder. This is not considered to be acceptable. The routes should be agreed through any updates to the Construction Traffic Management Plan, which should be discharged by the relevant highway authorities. It is also worth noting that this mechanism would mean that the Applicant would know all HGV movements that travel to from the site, making monitoring of total movements possible.

7.6 Construction Traffic Management Plan [APP-180]

- D.114 The CTMP should be approved by the local highway authority, specifically any changes (1.2.5).
- D.115 It is stated that contractor will be responsible for implementing measures in CTMP (1.3.1 and 3.1.1). The Councils consider this does not remove the ultimate responsibility for the applicant to ensure compliance of all measures in the CTMP and this is not made clear in the document. In Table 3.1 the only National Grid role is that of Environmental Clerk of Works. It should be clear who in the applicant's organisation (National Grid) is ultimately responsible for compliance with the CTMP and other management plans.

- D.116 If pre DCO commencement works take place under other planning regimes there must be a clear boundary between measures applicable to such works to those permitted in the DCO. The Councils would be concerned that using a number of different consenting processes could lead to fragmentary consideration of the impacts. The Councils have expressed concerns that pre commencement works are not managed by many of the management plans, for example, the CTMP. Experience has shown (EA1(N) and SZC) that pre-commencement works can generate traffic that has an impact on local roads and issues can arise such as delivery of safe accesses for these works including unforeseen vegetation removal or trimming.
- D.117 Paragraph 2.4.6 sets out details on the process for applying temporary Traffic Regulation Orders. Broadly the Councils accept the process, being similar to that for EA1(N) and SZC.
- D.118 Table 4.1 provides a response to comments raised on the DRAFT CTMP, in their response the Applicant has set out that they are not expecting significant numbers of HGVs during construction and that they will not commit to any structural surveys and repairs. This will form an area of disagreement between the parties. For clarity, the project has estimated 10,352 HGVs across the peak year alone as well as numerous AILs the number of which is not defined, which will have a detrimental impact on the structure of the highway. With regards to the Councils' request for controls on routing and numbers of HGVs, the Applicant has not committed to any controls as the preferred contractor is unknown. The Councils have been involved with numerous DCOs, including National Grid's Yorkshire Green Project, where this issue has not restricted other applicants from committing to these controls, which are a critical requirement. The Councils recognise that the CTMP could be subject to agreed changes to reflect specific contractor requirements. With regards to the Councils' requirement that vehicle numbers be monitored, the Applicant has set out that this is impractical. The Councils disagree that monitoring of the accesses is impractical, and has been agreed with other DCOs, and is necessary to evidence that impacts remain within those assessed. Given the Applicant's assessment methodology, the Councils also disagree that Travel Plan targets would be set following the initial travel survey. The assessment relies on a high proportion of staff travelling by minibus and this needs to form a commitment. The consultation on updates to the NPS EN-1 sets out that applicants should "*provide details of proposed measures to improve access by active, public and shared transport*", "*Secure behavioural change and modal shift through an offer of genuine modal choice*" and that the Secretary of State can consider refusing development if the Applicant "*does not show how consideration has been given to the provision of adequate active public or shared transport access and provision*". Clearly given the site's location

there is a heavy reliance on the minibus to achieve anything that might be considered sustainable travel patterns, and, on this basis, it needs to form a commitment.

- D.119 At Table 4.1, the Applicant considers it impractical and unnecessary to provide details on workers attending the site. However, the applicant does not consider it impractical and unnecessary to record details of the workers and visitors attending site on a daily basis. In the CTMP 7.3.5 the applicant states that staff will be required to sign in and out of each location and be issued permits to parking so such information will be available. The Councils note that other NSIP projects do provide the number of workers on a daily basis. Without attendance data it will be impossible to show that the workforce remains within that assessed in the EA and TA and that key embedded mitigation such as adherence to agreed shift times is realised.
- D.120 The Councils maintain that it should be discharging authority for the Construction Traffic Management Plan as per other recent DCOs.
- D.121 Paragraph 5.4.7 makes reference to the booking system, including recording and timing of all HGVs and LGVs. It is reasonable to assume that these movements on this basis can be controlled and that there should be a requirement to report these movements.
- D.122 Paragraph 7.2.2 identifies that it is “*anticipated that the mobile gangs will travel together to and from their accommodation each working day in a minibus*” and on this basis the minibus is an assumption rather than a commitment and so the assessment cannot be considered to be worst case.
- D.123 Paragraph 7.2.4 makes reference to inspections and site visits; the Councils would query whether these movements between the site areas are included in the assessment.
- D.124 Paragraph 7.3.1 sets out that “*it is anticipated that the contractor will undertake a staff travel survey*” and that it is “*anticipated that the results of the staff travel survey will inform the setting of project specific requirements*”. Clearly this does not form a commitment to undertake a travel survey, nor does it form a commitment to set targets. That being said, the Councils expect a commitment within the travel plan for the staff travel movements to achieve those car share proportions assessed in order for the project to reflect policy on sustainable travel patterns, and to limit impacts to those assessed within the Environmental Statement.
- D.125 Paragraph 7.3.3. sets out that “*it is anticipated that travel advice will be issues to visitors upon making appointments*” and as such this does not contain a commitment. It is reasonable to expect the Applicant to commit to travel planning in the form of providing information to visitors.

- D.126 The commitment to promoting car sharing is welcome; however, the Councils expect vehicle car share figures to match those use in the assessment based on the high proportion of minibus users (i.e., 30% X 1no. person per vehicle and 70% x by 4no. persons per vehicle = 3.1 persons per vehicle). This should form a target with associated monitoring and controls rather than the 1.3 car share target, which includes little in the way of monitoring nor commitment towards remedial action.
- D.127 The Councils welcome the commitment towards reviewing the travel survey for local pick-up and drop-off points to achieve higher proportions of car share and facilitate some good travel patterns.
- D.128 Paragraph 7.3.10 refers to an assumption that the main parking compound will hold 50 spaces. There is no assessment if these spaces will cater for the assessed demand nor any actual commitment to provide the spaces, nor any commitment to the permit scheme identified.
- D.129 Paragraph 7.4.1 sets out that *“it is anticipated that a baseline travel survey will be undertaken whilst paragraph 7.4.2 sets out that “it is anticipated that the contractor will undertake quarterly reviews following the three-month audit period”*. There is no commitment to achieve sustainable travel patterns, nor any control over changes made to the Construction Traffic Management Plan to reflect new targets. The highway authorities should approve any changes made to targets. The Councils require commitment to achieving the travel patterns assessed to reflect policy on sustainable travel patterns, and to limit impacts to those assessed within the Environmental Statement. At Paragraph 7.4.3 there should be a commitment to provide a copy of the report to the relevant highway authorities once it is available rather than *on request*.
- D.130 Whilst recognising the need to make the project more sustainable by reducing single occupancy car journeys for workers. The data collected in 7.4.1 of the CTMP falls short of demonstrating that the target car share is being achieved nor that the movements are within the parameters assessed. The preference of the Councils is that non-compliance or complaint such as HGVs diverting from agreed routes or exceedance of daily movements is report to the local highway authority and local planning authority as soon as practical.
- D.131 Paragraph 8.2.5 sets out that HGVs will be tracked for the construction routes using GPS data. It appears that those authorised construction routes would be agreed between the Applicant and the contractor. This is not considered to be acceptable. The routes should be agreed through any updates to the Construction Traffic Management Plan, which should be discharged by the relevant highway authorities. It is also worth noting that

this mechanism would mean that the Applicant would know all HGV movements that travel to from the site, making monitoring and reporting of total movements and timing of movements possible. The paragraph also refers to changes to traffic level that are higher than the CTMP assumptions. Clarity should be provided on what these assumptions are.

- D.132 The Councils' opinion is that the CTMP and any subsequent changes should be approved by the local highway authority, in consultation with local planning authority.

Specific Comments on Abnormal Indivisible Loads

- D.133 The application should prove that they have a feasible route from a port of origin and the relevant site access. This includes proving that highway structures are capable of bearing the anticipated loads. This may require surveys or investigation of structures where such information is dated or not available and, if necessary, repairs or temporary works to these structures. The applicant is expected to agree the scope of any such investigations or works and cover the LHA's reasonable costs in approving these. Contrary to the applicants comments the local highway authority is not under any obligation to maintain structures for loads greater than those legally permitted (i.e., 44 tonnes). At the time of writing, SCC has placed temporary restrictions for STGO movements on a number of structures in the Bramford area. Pressure on funding has resulted in weight limits being implemented on highway structures at short notice (e.g., A1088 Stowlangtoft).

Special Order Movements

Shunt Reactors

- D.134 Delivered to Bramford (site access AB-AP1)

Special Types General Orders

- D.135 Cable Drums (STGO2 or 3) delivered to:

D.135.a Dedham Vale East CSE Compound off Rands Road, Layham (site access D-AP2)

D.135.b Dedham Vale West CSE compound of A134 Nayland Road, Leavenheath (site access F-AP6)

D.135.c Stour Valley East CSE Compound off B1508 St Edmunds Hill, Bures (site access G-AP4)

- D.136 For the above, the applicant has not provided a point of origin so it cannot demonstrate compliance with the 'nearest port' policy of NPS EN-1.

Mobile Cranes and Piling Rigs

- D.137 The applicant has not identified the access locations for these loads, but as they are necessary for construction of the piles, CSE compounds, substations and temporary bridges it appears a significant number of accesses and routes to them will be involved. In addition, low loaders required for transporting construction equipment such as excavators or dumper trucks, including during the pre-commencement phase, may be classed as STGO.
- D.138 The Councils are concerned that the lack of detail does not make it possible for the LHA to assess the potential impacts of the AIL movements. Although the impacts are normally felt for a few hours, these movements will have a particularly noticeable impact on the local highway network resulting in increased journey time and delay.
- D.139 The Transport Assessment 2.2.4 states that D-AP2, F-AP6 and G-AP4 will be used as AIL accesses. The Councils seek clarification as whether in this statement the applicant is referring to AILs as defined as special order movements or all AILs including STGO. It is the Councils understanding that AILs in the form of STGOs (e.g., cranes, piling rigs) will enter the site at other locations.
- D.140 The Councils maintain their structures on a risk-based approach dependent on the size, structural form and routes carried by assets. With decreasing budgets and progressive deterioration of assets, future restrictions based on Special Order, Special Type General Order and Construction & Use categories are likely to be placed on local highway structures.
- D.141 In accordance with the asset management principles outlined in SCC's code of practice, Well-Managed Highway Infrastructure, Suffolk County Council undertakes detailed Inspections, Structural Reviews and Assessments on a number of strategically important assets every year. However, pending further investigation into the condition of many of the structures on the, as yet unknown, AIL route from a port to the site may, following further assessment result in revised capacity for certain structures. The risk of structures being or becoming weaker applies to both the construction and operational phase of the project.
- D.142 The Applicant has not demonstrated whether highway structures in the area adjacent to the substation at Bramford nor the Sealing End Compounds (and the wider regional route to suitable ports) can carry appropriate heavy loads. Whilst a route from the M25 to Bramford was included in the DfT preferred high and heavy routes these have been withdrawn with reliance placed on the ESDAL system to plan individual movements. Thus, each individual load will be assessed immediately prior to its movements and there will be no

strategic consideration of a resilient route to the site either during the construction phase nor the operational phase.

- D.143 The Councils are aware that a number of structures, for example the rail bridge on the B1113 at Claydon have deteriorated and are now subject to weight limitations for Special Types General Orders and above. Therefore, at this time uncertainty remains whether AILs can access the site.
- D.144 There are several small bridges and culverts that are proposed to be crossed by vehicles during the construction works where it is unclear whether the structure has capacity to withstand the loading of vehicles proposed.
- D.145 The Councils are concerned that the Applicant has not requested highway boundary details of the relevant junctions so that it can be confirmed that AILs movements, or works to facilitate them, do not extend beyond the public highway except where already identified. In many cases, it will be necessary to commission surveys to establish boundaries. The use of Ordnance Survey baseline map data also constitutes a risk particularly where tolerances between loads and structures are small.
- D.146 The applicant claims in the Construction Traffic Management Plan [APP-180] (5.2.1) that pre-construction surveys have been undertaken on routes that are anticipated to be used by AILs. Discussions are ongoing but the high-level survey have indicated that some structures have restrictions that would limit or prevent AIL movements. The Councils consider that further structural investigations are necessary together with swept path analysis at junctions or pinch points to show that there are feasible routes to the site accesses.
- D.147 Section 5.3 includes reference to the Special Types General Orders that will be required for the project, and it is noted that the shunt reactors and Super Grid Transformers will require police escorts. The Councils would recommend reaching agreement with the constabulary on resourcing given that numerous local NSIPs that will require police escorts.

Specific Comments on Temporary Accesses

- D.148 The Councils' position is that the Applicant must provide sufficient unambiguous information to enable the ExA to judge if the proposals are feasible, safe and deliverable for the purpose of the examination and for the Councils to assess if they are acceptable within the local highway network. The Councils acknowledge that such information should be proportionate but also that the dDCO grants significant powers to the Applicant. Experience with other DCOs and planning applications has shown that not considering this matter in sufficient detail can result in significant problems with delivery.

- D.149 The review of the accesses is included in Annex F. A common theme is the lack of detail to demonstrate that the accesses are feasible and deliverable. No detailed drawings or review has been undertaken to ensure that the order limits are sufficient to deliver safe access nor whether they abut the highway boundary in all cases. In addition, consideration must be given to the scope of vegetation clearance with any sensitive areas identified. Whilst Requirement 11 states that no work on a vehicular access can commence without agreement from the local highway authority, the Councils have experience from recent DCOs where failure to consider the practicality and deliverability of an access has resulted in problems delivering safe access or at best compromises are subsequently made to the design. Removal of vegetation is shown on the Landscape and Ecological Management Plan [APP-182] vegetation retention and removal plans. However, the applicant has not validated these against the visibility splays required for each access, noting SCC's concerns regarding the effectiveness of temporary 30mph speed limits stated elsewhere in this document.
- D.150 The applicant should not assume that because an access is in use that it will be suitable to the change or intensification of use during the construction phase. Many, particularly filed entrances and private accesses evolved and pre-date any formal design process.
- D.151 The Councils expect the applicant to enter into an agreement with the authority for any works within the highway. This is in part to ensure that it is clear what standard of inspection is required by the contractor (CTMP 5.5.7) and clarify who is liable for the site at any time. An agreement also provides a framework for approval of each access to satisfy Requirement 11, inspection of the materials and workmanship together with recovery of the authorities reasonable costs.

Specific Comments on Permanent Accesses

- D.152 The Councils are concerned that the Landscape and Ecological Management Plan Appendix A -Vegetation and Retention Removal Plan [APP-183] does not clearly show vegetation that has to be permanently removed for these accesses. Nor has information been provided to the local highway authority regarding what, if any, areas of the accesses are intended to become highway maintainable at public expense. It is presumed that beyond the access points to the existing public highway the access roads will be privately maintained. No plans showing the general arrangement, drainage, kerbing or construction details have been shared with the authority.
- D.153 The permanent accesses in Suffolk are:

- D.153.a Bramford Sub Station off Burstall Lane: This access is extant and regularly used by construction and operational traffic serving the various sub stations.
- D.153.b Dedham Vale East CSE Compound off Millwood Road, Polstead (site access D-DAP2): During the construction phase the compound is served off a haul road from Rands Road, Layham. The permanent access reverts to Millwood Road, Polstead. This is a narrow country lane, unsuitable for significant HGV movements and connection to the A1071 is at Hadleigh Heath (Stackwood Road), which is an evolved junction that does not conform to current design standards.
- D.153.c Dedham Vale West CSE compound: During the construction phase the compound is served off a haul road from of A134 Nayland Road, Leavenheath (site access F-AP6). The permanent access will be off the B1068 Stoke Road, Leavenheath via access F-AP4. The Councils are concerned that the work required to create a safe permanent access, specifically the vegetation removal to the east, has not been fully assessed by the applicant.
- D.153.d Stour Valley East CSE Compound off B1508 St Edmunds Hill, Bures (site access G-AP3): Again, the Councils consider that the applicant has not fully assessed the construction impacts of the new access in terms of vegetation clearance. Note that this access is in Suffolk not Essex as stated in Schedule 12 of the dDCO.

Construction Routes

- D.154 Paragraph 5.4.3 of the Construction Traffic Management Plan [APP-180] sets out that the construction routes will be agreed with the contractor. Whilst the Applicant can agree potential routes with contractors, the construction routes should be approved by the relevant highway authorities.
- D.155 The Councils welcome the applicants' proposals at Transport Assessment [APP-061] paragraph 2.4.3 that it will favour the SRN and A roads where practical, but not that this is only when it does not lead to excessive trip distance and journey time. There are several routes that are not practical for construction access as discussed below. As a local highway authority, SCC is concerned that the applicant intends to finalise the access routes post consent. SCC considers that this does not allow the applicant nor the authority to consider the practicality of the routes or assess the impacts on those routes. All recent DCOs in Suffolk have identified access routes as part of the DCO application.
- D.156 The Councils note the applicant's view that the highway authority is responsible for maintaining the highway. However, that duty is only for the

usual traffic that can be expected to use the network. Under section 59 of the Highway Act 1980 a Highway Authority can recover expenses due to extraordinary traffic. Rather than engage in wasteful legal processes, the Councils would prefer to enter into an agreement with the applicant to survey appropriate roads on a regular basis to determine if structural deterioration results from the projects construction traffic and if so, obtain appropriate mitigation. This methodology has been applied to recent NSIPs in Suffolk (EA1(N), EA2, Galloper, SZC).

- D.157 The applicant's view is that signing for the project should be included in the permit system. The Councils would consider that the permits are issued for specific locations and a more holistic project wide signing strategy, perhaps secured through the CTMP is more appropriate. The Councils are concerned that the routes will be agreed with the contractor. There appears to no approval process for this with either the relevant local highway authority or local planning authority.

Specific Comments on Monitoring, Reporting and Enforcement

- D.158 The complaints procedure referred to a paragraph 8.4.1 including reporting and actions taken should be reported to the local highway authorities.
- D.159 Paragraph 8.6.6 should refer to changes to the Construction Traffic Management Plan being discharged by the relevant highway authorities.
- D.160 Nowhere within the CTMP are any measures included to report or share compliance data with any organisation outside of National Grid and their contractors Without a robust monitoring regime with the data made available at regular defined intervals to an agreed format will it be possible to oversight applicants' mitigation measures. In the Councils view, the CTMP should be expanded to include the process of monitoring, reporting (including on a publicly accessible platform) and enforcement with the local planning authority and local highway authority engaged throughout. Merely assuming all project HGV and LGV movements will be recorded carries little weight, particularly as collecting GPS tracking data for HGVs is a commitment in paragraph 8.2.5 of the Construction Traffic Management Plan [APP-180].
- D.161 There do not appear to be any measures in the Construction Traffic Management Plan [APP-180], Code of Construction Practice [APP-178] or Construction Environment Management Plan [APP-177] that include monitoring, reporting and enforcement of emission standards that are secured as GG12 in the Code of Construction Practice. Without these the commitment cannot be shown to carry weight.
- D.162 It is noted that in the Construction Environment Management Plan [APP-177] at paragraph 15.3.1 the Environmental Clerk of Works responsibilities only

appear to undertake site audits and does not include reviewing data collected to monitor the transport aspects of the project. The local highway authorities are not referred to as enforcing authorities so presumably would not be made aware of non-compliance with the management plans. Nor are the local planning authority or local highway authority notified of complaints or how they have been resolved (see paragraph 15.4).

- D.163 The monitoring, reporting and enforcement measures across all management plans are considered by the Councils to be unacceptable. The process is weak and does not provide the assurances that the authority seeks that the applicant will be able to demonstrate the effectiveness of their management plans to stakeholders and local communities.

Specific Comments on Management of Street Works

Permit Scheme

- D.164 The Councils welcome the applicant's intention to use the authority's street works permit scheme, particularly the commitment to co-ordinate such works with others. Recovery of costs for permits should be included in the protective provisions or highways side agreement.

Traffic Regulation Orders

- D.165 The Councils note that the applicant has included permanent and temporary traffic regulation orders within the dDCO. Comments on these are included. Experience as other NSIPs are delivered shows that additional or revised orders are required. Whilst the authority would work with the applicant to do so it would expect to recover any costs incurred.
- D.166 The applicant is requesting parking restrictions on many roads in Schedule 12 of the dDCO. The Councils question the need for these. If parking is obstructive the police already have powers to remove vehicles and the applicant would be reliant on the LHA or its agents to enforce the parking restrictions in any event. To implement the restrictions the applicant would need to either place significant lengths of road markings and signs on the network or place and remove no parking cones daily. The Transport Assessment [APP-061] states that there is no evidence of extensive or frequent on street parking except for a small number of locations including Bures.
- D.167 The Councils note that many of the streets are incorrectly referenced. The applicant should refer to the national street gazetteer which is a web-based resource which the applicant can access via its website "findmystreet.co.uk". Failure to use the correct street name can invalidate traffic regulation orders.

- D.168 The authority is mindful of the additional resources that the applicant may expect if widespread enforcement of the traffic regulations is necessary and the potential requirement for additional local authority or police officers for a short term commitment.

Road Closures

- D.169 The applicant states in CTMP 56.5.4 that smaller roads may need to be closed for up to two weeks during construction of accesses. The applicant's attention is drawn to the need for careful programming of these closures so that they do not coincide and cause unnecessary delays or confusion to road users.

Road Crossings

- D.170 The applicant in CTMP 5.7.2 states that where roads are wide enough, open-cut trenches can be undertaken in two halves. The Councils wish to draw the ExA's attention to the fact that even with a 30mph speed limit this is impractical on roads less than 7.4m wide if used by HGVs (i.e. min 3.2m running lane and min 0.5m safety zone). Almost all roads in Suffolk are narrower than this, hence most will require closure for the trenching works.
- D.171 The Councils position is that it prefers no-cut crossings of the public highway wherever practical.
- D.172 The Councils have yet to review the closures proposed in the Access Rights of Way and Public Rights of Navigation Plans.

Traffic Management

- D.173 Although not stated the temporary access design appears to rely on temporary speed limits of 30mph to reduce visibility and other design criteria. It is unclear how these speed limits will be enforced and if not the likelihood that drivers will comply with the temporary limits. The Councils are concerned that to rely solely on a temporary speed limit to slow vehicles to provide safe working conditions could many locations be unsafe.
- D.174 The applicant has included parking restrictions on access roads (Schedule 12). The Councils question the need for these.

**E Traffic and Transport (Chapter 12), Short
Description of the Local Highway Network within
the Study Area, 2023**

Short Description of Local Highway Network within the Study Area

- E.1 The following is a brief description of the local road network. It is not intended to be exhaustive and local communities will be able to identify their specific transport concerns. The Councils are happy to provide greater detail if requested by the Examining Authority.
- E.2 The Councils note that the applicant intends to use several minor roads. Such roads are not treated as a priority for winter service and have a lower priority with regard to repairs.

A12 South of Ipswich and A12/A14 Copdock Interchange

- E.3 The Copdock Interchange is often regarded by users as being at or exceeding capacity due to queues, particularly on the A12 northbound during peak hours. Whilst these roads are the responsibility of National Highways, the delays do impact on local roads maintained by SCC as the LHA. Drivers are known to divert from the A12 at the Bentley Long Wood Junction and use the old London Road and Swan Hill in Copdock to access the A1071 at the B1113 Beagle Roundabout increasing traffic through the community.

A1214 London Road

- E.4 A1214 is a dual carriageway subject to 40mph speed limit. North of the access to a retail estate the road crosses an arco culvert carrying water main. This structure is subject to a STGO limit.

B1113: Claydon to Sproughton

- E.5 The B1113 forms the main route to Bullen Lane and Bramford substation from either the A14 at Claydon to the north or the B1113 Beagle Roundabout to the south. From the north a short section of dual carriageway gives access via a signalised junction to a significant industrial area south of Great Blakenham. The road then becomes single carriageway with variable speed limits. It passes west of Bramford, but through the centre of Sproughton. The High Street in Sproughton is narrow, particularly in a section with significant on-

street parking. An environmental weigh limit of 7.5 tonnes prevents HGVs from passing through Sproughton. However, this is removed when the route is used to divert A14 during planned works or emergencies.

- E.6 Pedestrian and cycling facilities are inconsistent with an off-road link between Bramford and Sproughton. There are narrow footways in Sproughton, but they are limited along the rest of the route.
- E.7 There are frequent junctions on the route, almost all non-compliant with modern design standards. Of particular note are the junctions at Pound Land and Burstall Lane both which have poor visibility from the minor arm. Following an number of collisions the speed limit was reduced at the former, the latter already being within the 30mph limit for Sproughton.

Burstall Lane, Church Hill and The Street, Burstall

- E.8 All these are typical narrow windy rural roads with intermittent private accesses for businesses and dwellings, and are not suitable for use by through construction traffic (e.g. from Sproughton) nor significant numbers of large vehicles. Although a 30mph limit is present in Burstall, there is little or no provision for walking or cycling on any of the roads.

Copdock – Chattisham – Hintlesham

- E.9 There are a number of roads that link Copdock to the southeast and the A1071 at Hintlesham to the north. All are very narrow and twisting, not suitable for any construction traffic. To reduce collisions the junction of Washbrook Road restrictions were put in on the turning movements at peak hours.

A1071 Ipswich to A134 Newton

- E.10 A1071 / A1214 London Road Junction: Layout and traffic signals improved to facilitate Wolsey Grange Phase 1 development.
- E.11 A1071 / Hadleigh Road junction: Three-way signalised priority junction that is to be improved with pedestrian / cycle facilities as part of the Wolsey Grange Phase 2 development.
- E.12 A1071 bridge over A14: May be widened to three lanes for Wolsey Grange Phase 2 development. No known weight restrictions.
- E.13 A1071 / B1113 'Beagle Roundabout', Sproughton: Some historic congestion and road safety issues. Congestion considered to be due

to unequal flow from Swan Hill arm. Junction to be improved as part of Wolsey Grange Phase 2 development.

- E.14 A1071 / The Street junction Burstall: Simple priority junction. Historically there have been a number of collisions at and either side of the junction. The junction was improved with additional signing and resurfacing to improve skid resistance with higher PSV material.
- E.15 Burstall Bridge: Masonry arched structure. Due to poor alignment and narrow width historically subject to parapet strikes.
- E.16 South of junction to Chattisham: Road narrows between two banks and is not wide enough for two large vehicles to easily pass as shown by verge erosion. Section between Burstall Bridge and Hintlesham had history of collisions.
- E.17 Hintlesham: Small settlement with Primary School, garage and public house abutting the A1071. There is a signalised pedestrian crossing and 30mph speed limit. Historic issues with on street parking associated with school, hence the parking restrictions. Hintlesham Hall, private wedding venue and golf course main access is off A1071 before the junction with Duke Street. The secondary access (not for public) is on a bend to the west. There is a number of 90 degree bends at Duke Street and further west which have a history of collisions. A 40mph speed limit was installed to reduce the severity of crashes.
- E.18 Hintlesham to Hadleigh: The road was straightened and is generally wide with large radius bends and few junctions. As a results speeds are relatively high for the route.
- E.19 Hadleigh Bypass is a more recently designed and constructed road. However, there have been a number of collisions at two of the priority junctions, Aldham Mill Hill and the A1141.
- E.20 Between Hadleigh and the A134 at Newton, with the exception of a 40mph limit adjacent to Boxford, the road is relatively wide and straight, although many of the minor road junctions have not been improved to modern design standards.

A134 Nayland to Sudbury

- E.21 Although an A road this is a windy road with some narrow sections. Much of the road is derestricted although there are speed limits through Assington and Leavenheath/Honey Tye. The section past Assington has a 40mph limit, which was installed for road safety reasons following a number of crashes. The junction with the A1071 is regarded by the local community as an area with a poor safety

record although the collision data does indicate a significant number of injury related crashes in the past five years. A greater number of collisions have occurred further south at the junction of the B1087 Bear Street at Nayland

Stone Street

- E.22 Stone Street is a minor road linking the B1068 at Leavenheath and the A1071 at Boxford. Towards the middle of this route is a small hamlet forming part of the Parish of Polstead. The section of Stone Street through this settlement is very narrow, twisting and has poor forward visibility. As a result, there is often conflict between opposing vehicles creating deals and damage to properties. The route is totally unsuitable for even light vehicles.

B1508 Sudbury to Bures

- E.23 Formed into three sections, an urban area of Great Cornard with dense development, the village of Bures with historic building and narrow twisting road, and a rural section between. Both built-up areas are subject to a 30mph speed limit. Between the two communities the B1508 is a narrow sinuous route generally closely flanked by trees and hedges. Additional warning signs and a 40mph speed limit has been installed to improve a poor safety record.
- E.24 The B1508 through Bures has a number of sharp bends and pinch points, which has resulted in large vehicles mounting the kerb and footways, on occasion damaging listed buildings. This is evidenced by bollards installed at the verges and footways. The footways are generally not continuous, are narrow, sometimes obstructed by these bollards and there are few formal crossing points.

Bures to Nayland and Assington (e.g. Cuckoo Hill)

- E.25 These roads are mostly C or unclassified, narrow and windy without footways and unsuitable for even light construction traffic.

B1068 Leavenheath to A12 north of Stratford St Mary

- E.26 The western end of the B1068 provides access from the B1068 to the Copella Fruit Juice Plant. Beyond this point the road narrows and becomes windier. An 18-tonne environmental weight limit is present through Stoke by Nayland and the road through the village has been extensively traffic calmed including a 20mph speed limit. Stoke by Nayland is also home to the Stoke by Nayland Golf Club and Resort which hosts national events.

- E.27 Between Stoke by Nayland and the A12 north of Stratford St Mary the B1068 is a windy, undulating road with some narrow sections where two vehicles find it difficult to pass. The road passes through the small communities of Thorrington and Higham. Evolved priority junctions are common.
- E.28 The junction with the A12 would not conform to modern design standards, particularly the short slip lanes. Turning for southbound A12 traffic was prevented for safety reasons and right turns out of the B1068 were stopped earlier.

B1070 Hadleigh to A12 Holton St Mary

- E.29 At its western end the B1070 passes through Benton Street, Hadleigh. This section is very narrow and constrained by on-street parking. Footways are narrow and frequently over-run as vehicles try and pass each other, which can result in damage to adjacent listed buildings. A 7.5 tonne weight limit is present to prevent HGVs using this route.
- E.30 Between Hadleigh and the A12 the road is typically windy, with narrow pinch points. It passes through, from west to east, the communities of Upper Layham, Raydon, Holton St Mary. Each are small settlements with some on-street parking and buildings that are close to the carriageway. All are subject to 30mph speed limits. Pedestrian and cycle facilities are limited throughout the route, including within the villages. Junctions are typically evolved priority junctions, which would not comply with modern design standards.

Duke Street, Pond Hall Road: Hintlesham to Hadleigh

- E.31 This route forms an alternative to the A1071 between Hintlesham and the south side of Hadleigh. It is a minor classified road with few improvements. The first part, Duke Street is part of the village of Hintlesham and is developed on both sides with some lengths of footway and a 30mph speed limit. To the south the route becomes a twisting road of moderate width, generally flanked by arable fields with scattered dwellings and farms. Nearing Hadleigh development becomes more frequent with a small industrial estate west of Clay Lane. Clay Hill, Clay Lane and Woodlands Road form local connections to the south. These roads are typically narrow, windy and unsuitable for large vehicles.
- E.32 The route enters the Hadleigh from the north becoming Station Road. Adjacent to this road are the local secondary school and primary school. A priority system has been installed to provide for a footway and this restricts vehicle movement in this area.

Quiet Lanes

E.33 A number of roads in the Assington area have been designated as Quiet Lanes.

E.33.a U8618 Dorking Road, Assington

E.33.b U8607 Wormingford Road, Assington

E.33.c U8610 Barraks Road, Assington

E.33.d U8611 Nayland Road, Assington

F Traffic and Transport (Chapter 12), Review of Site Accesses, 2023

- (1) From the Street Gazetteer
- (2) Estimated from SCC Records
- (3) Based on SCC Guidance (REF)
- (4) Awaiting further information from Applicant

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
AB-AP1	Bullen Lane Access	Bramford	U4421	Sheet 1	private	4.8	60	n/a	215		Yes	Permanent
AB-AP2A	Burstall Hill (not Church Hill)	Burstall	C726	Sheet 2	field	3.0	60	n/a	215	no	yes	Temporary
AB-AP3	Church Hill				private	4.5	60	n/a	215	no	yes?	Temporary
AB-AP4					new	4.4	60	n/a	215	no	yes	Temporary
AB-AP5					field	3.2	60	n/a	215	no	yes	Temporary
AB-AP2B	Burstall Hill				private	5.4	60	n/a	215	no	yes	Temporary
AB-AP6	Back Road (not Ipswich Road)	Hintlesham	A1071	Sheet 3	private	5.4	40	n/a	120	no	yes?	Temporary
AB-AP7					field	5.7	40	n/a	120	no	no	Temporary
AB-EAP1					private	5.4	40	n/a	120	no	yes	Temporary
AB-AP8				new	6.0	40	n/a	120	no	no	Temporary	
AB-EAP2a				private	7.6	60	n/a	215	no	no	Temporary	
AB-EAP2b	Ipswich Road	Hadleigh			new	7.1	60	n/a	215	no	no	Temporary
AB-DAP1	Hadleigh Road (Not Thorpes Hill)	Burstall	A1071	Sheet 4	field	5.2	60	n/a	215	no	no	Temporary
AB-DAP2		Hintlesham	C464	Sheet 4	field	3.9	60	n/a	215	no	no	Temporary

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
AB-DAP3	Washbrook Road (not Pigeon's Lane)				new	3.6	60	n/a	215	no	yes	Temporary
AB-DAP4	Lower Barn Road	Chattisham	U4304	Sheet 5	new	3.6	60	n/a	215	no	yes	Temporary
AB-DAP5	Mill Lane (not Chattisham Lane)		U4305		new	3.6	60	n/a	215	no	no?	Temporary
AB-DAP6	Duke Street	Hintleham	C730	Sheet 7	private	6.0	30	n/a	90	no	no	Temporary
AB-DAP7	Clay Hill	Hintlesham	C446		field	4.2	30/60	n/a	90/215	no	yes	Temporary
AB-DAP8					field	5.0	60	n/a	215	no	yes	Temporary
AB-AP9	Pond Hall Road	Hintlesham	C730	Sheet 8	private	5.0	60	n/a	215	no	yes	Temporary
AB-AP11		Hadleigh			field	6.1	60	n/a	215	no	yes	Temporary

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
AB-AP12					private	6.2	60	n/a	215	no	yes	Temporary
AB-AP13					new	4.9	60	n/a	215	no	yes	Temporary
<i>AB-AP14</i>										no	yes	Temporary
AB-AP17					Sheet 9	private	6.1	60	n/a	215	no	yes
AB-DAP9	Woodlands Road	Raydon	C465	Sheet 8	field	4.4	60	n/a	215	no	yes	Temporary
AB-DAP10	Clay Lane	Hadleigh	U4308		new	2.7	60	n/a	215	no	yes	Temporary
AB-AP15					new	2.9		n/a		no	yes	Temporary
AB-AP16					field	3.7		n/a		no	yes	Temporary
C-AP1	Pipkin Hill (not B1070 (Benton Street))				new	6.6	40	n/a	160	no	yes	Temporary
C-AP2					new	5	40	n/a	160	no	yes	Temporary
C-DAP1	The Street (not Benton Street)	Layham		Sheet 10	field	4.5	30	n/a	90	no	yes	Temporary
C-AP3	Layham Road	Layham	C727	Sheet 10	field	4.9	60	n/a	215	no	yes	Temporary
C-AP4					track					no	yes	Temporary

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
C-AP5	Overbury Hall Road	Layham	U8501	Sheet 11	field	3	60	n/a	215	no	yes	Temporary
D-AP1					private					no	yes	Temporary
D-DAP1	Rands Road	Layham	U8503	Sheet 11	field	3	60	n/a	215	no	yes	Temporary
D-AP2					private					6.2	60	215
<i>D-DAP2</i>	Millwood Road	Polstead	U8512	Sheet 12	field	3.9	60	n/a	215	no	yes	Permanent
D-AP3					field?		60	n/a	215	no	yes	Temporary
D-AP4					new	3.8	60	n/a	215	no	yes	Temporary
<i>D-EAP1</i>					highway		60	n/a	215	no	yes	Temporary
D-AP6	Heath Road	Polstead	U8515	Sheet 12	field	3.8	60	n/a	215	no	yes	Temporary
D-AP7					new					no	yes	Temporary

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
D-DAP2A					field	3.9	60	n/a	215	no	yes	Temporary
D-DAP3					field	3.5	60	n/a	215	no	yes	Temporary
D-AP8	Holt Road	Polstead	C729	Sheet 13	field	3.8	60	n/a	215	no	yes	Temporary
E-AP1					new					no	yes	Temporary
<i>E-DAP1</i>					field	3.8	60	n/a	215	no	no?	Temporary
E-AP4	White Street Green (not Calais Street)	Polstead	U8545	Sheet 13	new	4	60	n/a	215	no	yes	Temporary
E-AP5					new					no	yes	Temporary
E-AP6				Sheet 14	field	3.7	60/30	n/a	215/90	no	yes	Temporary
E-DAP2					new	3.9	60	n/a	215	no	no	Temporary
E-DAP3					new					no	yes	Temporary
E-AP8	Brick Kiln Hill (not Brick Kiln Lane)	Polstead	C731	Sheet 15	private	4.7	60	n/a	215	no	no?	Temporary
F-DAP1					private	4.9	60	n/a	215	no	yes	Temporary
E-AP7	Stoke Road	Polstead	B1068	Sheet 15	new	5.8	60	n/a	215	no	yes	Temporary
F-AP1					new						yes	Temporary
E-DAP4					private track						yes	Temporary

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
E-DAP5					private access	5.9	60	n/a	215	no	no	Temporary
BM-1					new	5.6	60	n/a	215	no	yes	Temporary
BM-2					new						yes	Temporary
F-AP4	Stoke Road	Leavenheath	B1068	Sheet 15	field	4.8	60/30	n/a	215/90	no	yes	Permanent
F-AP5	Nayland Road (not Colchester Road)	Leavenheath	A134	Sheet 15	new	5.5	40	n/a	120	no	yes	Temporary
F-AP6					new						yes	Temporary
F-DAP2					field	7.2	40	n/a	120	no	yes	Temporary
F-AP7	Colchester Road	Assington	A134	Sheet 16	new	5.4	60	n/a	215	no	yes	Temporary
F-AP8	Nayland Road (not High Road)	Assington	U8611		new	3.3	60	n/a	215	no	yes	Temporary
F-AP9					field	3	60	n/a	215	no	yes	Temporary
F-DAP3					field	3.5	60	n/a	215	no	yes	Temporary
F-AP10	Bures Road (not Rose Green)	Assington	C733	Sheet 17	private road	4.8	30	n/a	90	no	yes	Temporary
F-DAP4					new	3.7	30	n/a	90	no	no?	Temporary
F-AP12					track	4.4	60	n/a	215	no	yes	Temporary
F-DAP5					new	4.1	60	n/a	215	no	yes	Temporary
F-AP13												

Table F1: Existing Conditions

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?	
F-AP11	Wormingford Road (not Smallbridge Entry)	Assington	U8607		new	2.8	60	n/a	215	no	no	Temporary
F-AP14	Dorking Tye (not Upper Road)	Assington	U8618	Sheet 17	field	3.9	60	n/a	215	no	yes	Temporary
G-AP2					field						yes	Temporary
G-AP1					hardstand	4.6	60	n/a	215	no	no?	Temporary
G-AP3	St Edmunds Hill	Bures St Mary	B1508	Sheet 20	new	4.9	40	n/a	120	no	yes	Permanent
G-AP4					new						yes	Temporary
G-DAP2					track	6.5					yes	Temporary
G-DAP1					track	7.7					yes	Temporary

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
AB-AP1	Bullen Lane Access	Bramford	U4421	Sheet 1	Permanent				
AB-AP2A	Burstall Hill (not Church Hill)	Burstall	C726	Sheet 2	Temporary		30mph	90m	7am-7pm
AB-AP3	Church Hill				Temporary		30mph	90m	7am-7pm
AB-AP4					Temporary				
AB-AP5					Temporary				
AB-AP2B	Burstall Hill				Temporary				
AB-AP6	Back Road (not Ipswich Road)	Hintlesham	A1071	Sheet 3	Temporary		30mph	90m	7am-7pm
AB-AP7					Temporary				
AB-EAP1					Temporary				
AB-AP8				Sheet 6	Temporary				
AB-EAP2a					Temporary				
AB-EAP2b	Ipswich Road	Hadleigh			Temporary				
AB-DAP1	Hadleigh Road (Not Thorpes Hill)	Burstall	A1071	Sheet 4	Temporary		30mph	90m	7am-7pm
AB-DAP2		Hintlesham	C464	Sheet 4	Temporary		30mph	90m	7am-7pm

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
AB-DAP3	Washbrook Road (not Pigeon's Lane)				Temporary		30mph	90m	7am-7pm
AB-DAP4	Lower Barn Road	Chattisham	U4304	Sheet 5	Temporary		30mph	90m	7am-7pm
AB-DAP5	Mill Lane (not Chattisham Lane)		U4305		Temporary		30mph	90m	7am-7pm
AB-DAP6	Duke Street	Hintlesham	C730	Sheet 7	Temporary		already subject to 30 limit	90m	7am-7pm
AB-DAP7	Clay Hill	Hintlesham	C446		Temporary		partially subject to 30 limit	90m	7am-7pm
AB-DAP8	Pond Hall Road	Hintlesham	C730	Sheet 8	Temporary		30mph	90m	7am-7pm
AB-AP9		Hadleigh			Temporary				
AB-AP11			Temporary						
AB-AP12			Temporary						

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
AB-AP13					Temporary				
					Temporary				
<i>AB-AP14</i>									
AB-AP17				Sheet 9	Temporary				
AB-DAP9	Woodlands Road	Raydon	C465	Sheet 8	Temporary		30mph	90m	7am-7pm
AB-DAP10	Clay Lane	Hadleigh	U4308		Temporary		30mph	90m	7am-7pm
AB-AP15					Temporary				
AB-AP16					Temporary				
C-AP1	Pipkin Hill (not B1070 (Benton Street))		B1070		Temporary		30mph	90m	7am-7pm
C-AP2					Temporary				
C-DAP1	The Street (not Benton Street)	Layham		Sheet 10	Temporary		partially subject to 30 limit	90m	7am-7pm
C-AP3	Layham Road	Layham	C727	Sheet 10	Temporary		30mph	90m	7am-7pm
C-AP4					Temporary				
C-AP5		Layham	U8501	Sheet 11	Temporary		30mph	90m	7am-7pm

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
D-AP1	Overbury Hall Road				Temporary				
D-DAP1	Rands Road	Layham	U8503	Sheet 11	Temporary		30mph	90m	7am-7pm
D-AP2					Temporary	STGO/SO	30mph	90m	7am-7pm
<i>D-DAP2</i>	Millwood Road	Polstead	U8512	Sheet 12	Permanent		<i>partially subject to 30 limit</i>	90m	7am-7pm
D-AP3					Temporary				
D-AP4					Temporary				
<i>D-EAP1</i>					Temporary				
D-AP6	Heath Road	Polstead	U8515	Sheet 12	Temporary		<i>partially subject to 30 limit</i>	90m	7am-7pm
D-AP7					Temporary				
D-DAP2A					Temporary				

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
D-DAP3					Temporary				
D-AP8	Holt Road	Polstead	C729	Sheet 13	Temporary	30mph	90m	7am-7pm	
E-AP1					Temporary				
<i>E-DAP1</i>					Temporary				
					Temporary				
E-AP4	White Street Green (not Calais Street)	Polstead	U8545	Sheet 13	Temporary	partially subject to 30 limit	90m	7am-7pm	
E-AP5					Temporary				
E-AP6				Sheet 14	Temporary				
E-DAP2					Temporary				
E-DAP3					Temporary				
E-AP8	Brick Kiln Hill (not Brick Kiln Lane)	Polstead	C731	Sheet 15	Temporary	30mph	90m	7am-7pm	
F-DAP1					Temporary				
E-AP7	Stoke Road	Polstead	B1068	Sheet 15	Temporary	partially subject to 30 limit	90m	7am-7pm	
F-AP1					Temporary				
E-DAP4					Temporary				
E-DAP5					Temporary				
BM-1					Temporary				
BM-2					Temporary				

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
F-AP4	Stoke Road	Leavenheath	B1068	Sheet 15	Permanent				
F-AP5	Nayland Road (not Colchester Road)	Leavenheath	A134	Sheet 15	Temporary	STGO/SO	30mph	90m	7am-7pm
F-AP6					Temporary				
F-DAP2					Temporary				
F-AP7	Colchester Road	Assington	A134	Sheet 16	Temporary		30mph	90m	7am-7pm
F-AP8	Nayland Road (not High Road)	Assington	U8611		Temporary		30mph	90m	7am-7pm
F-AP9					Temporary				
F-DAP3					Temporary				
F-AP10	Bures Road (not Rose Green)	Assington	C733	Sheet 17	Temporary		subject to 30 limit	90m	7am-7pm
F-DAP4					Temporary				
F-AP12					Temporary		partially subject to 30 limit	90m	7am-7pm
F-DAP5					Temporary				
F-AP13					Temporary				
F-AP11	Wormingford Road (not Smallbridge Entry)	Assington	U8607		Temporary		30mph	90m	7am-7pm
F-AP14		Assington	U8618	Sheet 17	Temporary		30mph	90m	7am-7pm

Table F2: Construction Phase

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Construction			
						Use (LGV/HGV/STGO/SO) (4)	Speed Limit (Schedule 12 Part 1)	Visibility (with TTRO)	Parking Restrictions
G-AP2	Dorking Tye (not Upper Road)				Temporary				
G-AP1					Temporary				
G-AP3	St Edmunds Hill	Bures St Mary	B1508	Sheet 20	Permanent		30mph	90m	7am-7pm
G-AP4					Temporary	SO / STGO			
G-DAP2					Temporary				
G-DAP1					Temporary				

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?				
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal
AB-AP1	Bullen Lane Access	Bramford	U4421	Sheet 1	Permanent	no	no	no	no	no
AB-AP2A	Burstall Hill (not Church Hill)	Burstall	C726	Sheet 2	Temporary	no	no	no	no	no
AB-AP3	Church Hill				Temporary	no	no	no	no	no
AB-AP4					Temporary	no	no	no	no	no
AB-AP5					Temporary	no	no	no	no	no
AB-AP2B	Burstall Hill				Temporary	no	no	no	no	no
AB-AP6	Back Road (not Ipswich Road)	Hintlesham	A1071	Sheet 3	Temporary	no	no	no	no	no
AB-AP7					Temporary	no	no	no	no	no
AB-EAP1					Temporary	no	no	no	no	no
AB-AP8				Sheet 6	Temporary	no	no	no	no	no
AB-EAP2a					Temporary	no	no	no	no	no
AB-EAP2b	Ipswich Road	Hadleigh			Temporary	no	no	no	no	no
AB-DAP1	Hadleigh Road (Not Thorpes Hill)	Burstall	A1071	Sheet 4	Temporary	no	no	no	no	no
AB-DAP2		Hintlesham	C464	Sheet 4	Temporary	no	no	no	no	no

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?				
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal
AB-DAP3	Washbrook Road (not Pigeon's Lane)				Temporary	no	no	no	no	no
AB-DAP4	Lower Barn Road	Chattisham	U4304	Sheet 5	Temporary	no	no	no	no	no
AB-DAP5	Mill Lane (not Chattisham Lane)		U4305		Temporary	no	no	no	no	no
AB-DAP6	Duke Street	Hintlesham	C730	Sheet 7	Temporary	no	no	no	no	no
AB-DAP7	Clay Hill	Hintlesham	C446		Temporary	no	no	no	no	no
AB-DAP8					Temporary	no	no	no	no	no
AB-AP9	Pond Hall Road	Hintlesham	C730	Sheet 8	Temporary	no	no	no	no	no
AB-AP11		Hadleigh			Temporary	no	no	no	no	no
AB-AP12					Temporary	no	no	no	no	no

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?				
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal
AB-AP13					Temporary	no	no	no	no	no
<i>AB-AP14</i>					Temporary	no	no	no	no	no
AB-AP17					Sheet 9	Temporary	no	no	no	no
AB-DAP9	Woodlands Road	Raydon	C465	Sheet 8	Temporary	no	no	no	no	no
AB-DAP10	Clay Lane	Hadleigh	U4308		Temporary	no	no	no	no	no
AB-AP15					Temporary	no	no	no	no	no
AB-AP16					Temporary	no	no	no	no	no
C-AP1	Pipkin Hill (not B1070 (Benton Street))	Layham	B1070	Sheet 10	Temporary	no	no	no	no	no
C-AP2					Temporary	no	no	no	no	no
C-DAP1	The Street (not Benton Street)				Temporary	no	no	no	no	no
C-AP3	Layham Road	Layham	C727	Sheet 10	Temporary	no	no	no	no	no
C-AP4					Temporary	no	no	no	no	no
C-AP5		Layham	U8501	Sheet 11	Temporary	no	no	no	no	no

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?					
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal	
D-AP1	Overbury Hall Road				Temporary	no	no	no	no	no	
D-DAP1	Rands Road	Layham	U8503	Sheet 11	Temporary	no	no	no	no	no	
D-AP2					Temporary	no	no	no	no	no	no
<i>D-DAP2</i>	Millwood Road	Polstead	U8512	Sheet 12	Permanent	no	no	no	no	no	
D-AP3					Temporary	no	no	no	no	no	no
D-AP4					Temporary	no	no	no	no	no	no
<i>D-EAP1</i>					Temporary	no	no	no	no	no	no
D-AP6	Heath Road	Polstead	U8515	Sheet 12	Temporary	no	no	no	no	no	
D-AP7					Temporary	no	no	no	no	no	
D-DAP2A					Temporary	no	no	no	no	no	

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?				
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal
D-DAP3					Temporary	no	no	no	no	no
D-AP8	Holt Road	Polstead	C729	Sheet 13	Temporary	no	no	no	no	no
E-AP1					Temporary	no	no	no	no	no
<i>E-DAP1</i>					Temporary	no	no	no	no	no
					Temporary	no	no	no	no	no
E-AP4	White Street Green (not Calais Street)	Polstead	U8545	Sheet 13	Temporary	no	no	no	no	no
E-AP5					Temporary	no	no	no	no	no
E-AP6				Sheet 14	Temporary	no	no	no	no	no
E-DAP2					Temporary	no	no	no	no	no
E-DAP3					Temporary	no	no	no	no	no
E-AP8	Brick Kiln Hill (not Brick Kiln Lane)	Polstead	C731	Sheet 15	Temporary	no	no	no	no	no
F-DAP1					Temporary	no	no	no	no	no
E-AP7	Stoke Road	Polstead	B1068	Sheet 15	Temporary	no	no	no	no	no
F-AP1					Temporary	no	no	no	no	no
E-DAP4					Temporary	no	no	no	no	no
E-DAP5					Temporary	no	no	no	no	no
BM-1					Temporary	no	no	no	no	no
BM-2					Temporary	no	no	no	no	no

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?					
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal	
F-AP4	Stoke Road	Leavenheath	B1068	Sheet 15	Permanent	no	no	no	no	no	
F-AP5	Nayland Road (not Colchester Road)	Leavenheath	A134	Sheet 15	Temporary	no	no	no	no	no	
F-AP6					Temporary	no	no	no	no	no	no
F-DAP2					Temporary	no	no	no	no	no	no
F-AP7	Colchester Road	Assington	A134	Sheet 16	Temporary	no	no	no	no	no	
F-AP8	Nayland Road (not High Road)	Assington	U8611		Temporary	no	no	no	no	no	
F-AP9					Temporary	no	no	no	no	no	no
F-DAP3					Temporary	no	no	no	no	no	no
F-AP10	Bures Road (not Rose Green)	Assington	C733	Sheet 17	Temporary	no	no	no	no	no	
F-DAP4					Temporary	no	no	no	no	no	no
F-AP12					Temporary	no	no	no	no	no	no
F-DAP5					Temporary	no	no	no	no	no	no
F-AP13					Temporary	no	no	no	no	no	no
F-AP11	Wormingford Road (not Smallbridge Entry)	Assington	U8607		Temporary	no	no	no	no	no	
F-AP14		Assington	U8618	Sheet 17	Temporary	no	no	no	no	no	
G-AP2					Temporary	no	no	no	no	no	no

Table F3: Layout Details in the DCO

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	Layout details in DCO?				
						Visibility splays	Highway Boundary	Swept path	Drainage	Vegetation Removal
G-AP1	Dorking Tye (not Upper Road)				Temporary	no	no	no	no	no
G-AP3	St Edmunds Hill	Bures St Mary	B1508	Sheet 20	Permanent	no	no	no	no	no
G-AP4					Temporary	no	no	no	no	no
G-DAP2					Temporary	no	no	no	no	no
G-DAP1					Temporary	no	no	no	no	no

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
AB-AP1	Bullen Lane Access	Bramford	U4421	Sheet 1	Permanent	PRoW Footpath not full highway
AB-AP2A	Burstall Hill (not Church Hill)	Burstall	C726	Sheet 2	Temporary	
AB-AP3	Church Hill				Temporary	Existing farm access with concrete surface
AB-AP4					Temporary	
AB-AP5					Temporary	Trees to south
AB-AP2B	Burstall Hill				Temporary	Private access, kerbed but over-run
AB-AP6	Back Road (not Ipswich Road)	Hintlesham	A1071	Sheet 3	Temporary	Trees may require trimming. On sharp bend. Secondary access to Hintlesham Hall
AB-AP7					Temporary	
AB-EAP1					Temporary	On bend
AB-AP8				Temporary		
AB-EAP2a				Sheet 6	Temporary	
AB-EAP2b	Ipswich Road	Hadleigh		Temporary	May be an access off layby	
AB-DAP1	Hadleigh Road (Not Thorpes Hill)	Burstall	A1071	Sheet 4	Temporary	Field entrance off private unmade layby

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
AB-DAP2	Washbrook Road (not Pigeon's Lane)	Hintlesham	C464	Sheet 4	Temporary	Restricted turning ban (0700-0900) into this road from A1071
AB-DAP3					Temporary	
AB-DAP4	Lower Barn Road	Chattisham	U4304	Sheet 5	Temporary	May be an unauthorised field entrance on junction
AB-DAP5	Mill Lane (not Chattisham Lane)		U4305		Temporary	
AB-DAP6	Duke Street	Hintlesham	C730	Sheet 7	Temporary	visibility may be obstructed by wall to south. Track is Hintlesham FP 041
AB-DAP7	Clay Hill	Hintlesham	C446		Temporary	immediately adjacent start /end of 30mph limit
AB-DAP8	Pond Hall Road	Hintlesham	C730	Sheet 8	Temporary	Access on Hintlesham FP 044
AB-AP9					Hadleigh	Temporary
AB-AP11		Temporary				
AB-AP12		Temporary				

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
AB-AP13					Temporary	
<i>AB-AP14</i>					Temporary	Not included in dDCO Schedule 6 Part 2 streets subject to temporary alteration of layout or Schedule 8 access to work
AB-AP17				Sheet 9	Temporary	Bends and dip
AB-DAP9	Woodlands Road	Raydon	C465		Temporary	
AB-DAP10	Clay Lane	Hadleigh	U4308	Sheet 8	Temporary	
AB-AP15					Temporary	
AB-AP16					Temporary	
C-AP1	Pipkin Hill (not B1070 (Benton Street))		B1070		Temporary	
C-AP2					Temporary	Footway
C-DAP1	The Street (not Benton Street)	Layham		Sheet 10	Temporary	Footway
C-AP3	Layham Road	Layham	C727	Sheet 10	Temporary	
C-AP4					Temporary	
C-AP5		Layham	U8501	Sheet 11	Temporary	

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
D-AP1	Overbury Hall Road				Temporary	acute angle towards south
D-DAP1	Rands Road	Layham	U8503	Sheet 11	Temporary	acute angle towards west
D-AP2					Temporary	entrance to Layham Quarry. Probably has extant planning permission
<i>D-DAP2</i>	Millwood Road	Polstead	U8512	Sheet 12	Permanent	Not included in Schedule 6 Part 2 streets subject to temporary alteration of layout
D-AP3					Temporary	
D-AP4					Temporary	
<i>D-EAP1</i>					Temporary	Existing highway junction - U4318 Polstead Road. Not included in Schedule 6 Part 2 streets subject to temporary alteration of layout
D-AP6	Heath Road	Polstead	U8515	Sheet 12	Temporary	
D-AP7					Temporary	

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
D-DAP2A					Temporary	Polstead FP 33
D-DAP3					Temporary	Polstead FP 32
D-AP8	Holt Road	Polstead	C729	Sheet 13	Temporary	
E-AP1					Temporary	
E-DAP1					Temporary	Not included in Schedule 6 Part 2 streets subject to temporary alteration of layout or Schedule 8 access to work
E-AP4	White Street Green (not Calais Street)	Polstead	U8545	Sheet 13	Temporary	
E-AP5					Temporary	
E-AP6				Sheet 14	Temporary	On 30/derestriction limit
E-DAP2					Temporary	
E-DAP3					Temporary	
E-AP8	Brick Kiln Hill (not Brick Kiln Lane)	Polstead	C731	Sheet 15	Temporary	Copella secondary access
F-DAP1					Temporary	
E-AP7	Stoke Road	Polstead	B1068	Sheet 15	Temporary	close proximity to Harrow Lane and access E-DAP4
F-AP1					Temporary	
E-DAP4					Temporary	
E-DAP5					Temporary	Copella main entrance
BM-1					Temporary	

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
BM-2					Temporary	
F-AP4	Stoke Road	Leavenheath	B1068	Sheet 15	Permanent	Adjacent to 30 limit / derestriction.
F-AP5	Nayland Road (not Colchester Road)	Leavenheath	A134	Sheet 15	Temporary	
F-AP6					Temporary	
F-DAP2					Temporary	
F-AP7	Colchester Road	Assington	A134	Sheet 16	Temporary	
F-AP8	Nayland Road (not High Road)	Assington	U8611		Temporary	
F-AP9					Temporary	
F-DAP3					Temporary	
F-AP10	Bures Road (not Rose Green)	Assington	C733	Sheet 17	Temporary	Junction of The Street, Barracks Road and Bures Road.
F-DAP4					Temporary	
F-AP12					Temporary	
F-DAP5					Temporary	
F-AP13					Temporary	
F-AP11	Wormingford Road (not Smallbridge Entry)	Assington	U8607		Temporary	
F-AP14		Assington	U8618	Sheet 17	Temporary	

Table F4: LHA Comments on Accesses

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Permanent / Temporary	LHA Comments
G-AP2	Dorking Tye (not Upper Road)				Temporary	
G-AP1					Temporary	
G-AP3	St Edmunds Hill	Bures St Mary	B1508	Sheet 20	Permanent	dDCO Schedule 6 Part 1 and Part 2 places these accesses in Essex.
G-AP4					Temporary	
G-DAP2					Temporary	
G-DAP1					Temporary	