

Our Ref: BTNO
Date: 31 October 2023
Enquiries to: Graham Gunby
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Via Portal

For the attention of Jake Stephens

Dear Mr Stephens

**BRAMFORD TO TWINSTEAD EN020002
SUFFOLK COUNTY COUNCIL 20041323
SCC DEADLINE 3 SUBMISSIONS**

Please find attached the Suffolk County Council's Deadline 3 submissions. These consist of the following.

- 1) Comments on any other submissions received at Deadline 2.
- 2) Responses to ExQ1.

If I can be of any further assistance with this matter, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Graham Gunby
National Infrastructure Planning Manager
Growth, Highways & Infrastructure
Suffolk County Council



Suffolk County Council (20041323)

Comments on any other submissions
received at Deadline 2

Bramford to Twinstead (EN020002)

Deadline 3

31 October 2023

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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Orders</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ExQ</i>	<i>Examining Authority’s Written Questions</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LHA</i>	<i>Local Highways Authority</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SuDS</i>	<i>Sustainable Drainage Systems</i>

“The Council” / “SCC” refers to Suffolk County Council; “The Host Authorities” refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.

Purpose of this Submission

The purpose of this submission is to provide responses to the Applicant’s Deadline 2 (D2) submissions and the Unaccompanied Site Inspections. Examination Library references are used throughout to assist readers.

1 Comments on any other submissions received at Deadline 2

- 1.1. At deadline 2 (11 October 2023), National Grid Electricity Transmission plc submitted, amongst other documents, the *Applicant’s Schedule of Changes to the Draft Development Consent Order [REP2-001]* (“**the Schedule of Changes**”).
- 1.2. The Schedule of Changes sets out, in Table 2.1, the changes made to Version A of the draft Development Consent Order (“**dDCO**”) [APP-034] in Version B of the dDCO [REP2-004].
- 1.3. In this document, SCC has taken the text from the first four columns of Table 2.1 and added a new, fifth, column in which SCC has added its comments on each of the changes (SCC has not included the text or tables from Rows 16 to 18 of the Schedule of Changes because it does not have any comments on them).

8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC’s comments on changes made
1a	Article 11, Street works	Article 11(3) has been amended in order to allow for the undertaker and the street authority to agree, on a case by case basis, an alternative period of time within which the street authority is permitted to determine an application for consent made pursuant to Article 11(2) before consent is deemed to have been given. This change responds to matters raised in the joint Local Impact Reports submitted by Braintree District Council and Essex County Council [REP1-039] and Suffolk	(3) If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 28 days beginning with the date on which the application was made, the authority will, <u>unless otherwise agreed</u> , be deemed to have granted consent.	SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. SCC considers the proposed drafting would have the effect of allowing the undertaker and street authority to agree, at the end of the 28 day period, whether consent is deemed to have been granted. To achieve the Applicant’s aim, SCC

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC’s comments on changes made
		County Council and Babergh and Mid Suffolk District Councils [REP1-045], and is intended to provide greater flexibility to all concerned.		<p>considers paragraph 11(3) should be amended as follows – “(3) If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 28 days <u>or such other period as agreed by the street authority and undertaker</u> beginning with the date on which the application was made, the authority will be deemed to have granted consent”.</p> <p>In any event, SCC does not consider the Applicant’s aim is satisfactory because the extension of time is dependent on the undertaker’s agreement and if that is withheld (even if withheld unreasonably) SCC would be in the same position as if paragraph (3) had not been changed in the first place.</p> <p>SCC maintains its position, as set out in the LIR [REP1-045] and in its <i>Comments on Applicant’s Comments on Relevant Representations</i> [REP2-013]:</p> <p>“While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally</p>

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC’s comments on changes made
				<p>significant infrastructure projects. A 28-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.</p> <p>Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision”.</p> <p>In addition, SCC considers the determination period should begin on the “date on which the application was received” rather than the “date on which the application was made”. SCC assumes this change will be uncontroversial because the determination period in the following articles already commences on receipt of the application and it would be sensible to have consistency across provisions: articles 19(9) (discharge of water); 21(8) (authority to survey and investigate the land); 47(8) (traffic regulation) and 48(5) (felling or lopping).</p>

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC's comments on changes made
1b	Article 14, Power to alter layout etc. of streets	Article 14(5) has been amended in order to allow for the undertaker and the street authority to agree, on a case by case basis, an alternative period of time within which the street authority is permitted to determine an application for consent made pursuant to Article 14(4) before consent is deemed to have been given. The rationale for this change is set out above in response to Change Ref. 1.	(5) If <u>Unless otherwise agreed, if</u> a street authority which receives an application for consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of 28 days beginning with the date on which application was made, it is deemed to have granted consent.	For the same reason as set out in “SCC’s comments on changes made” in Row 1, SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. In any event, SCC maintains its position, again as set out in “SCC’s comments on changes made” in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.
1c	Article 15, Temporary stopping up of streets and public rights of way	Article 15(9) has been amended in order to allow for the undertaker and the street authority to agree, on a case by case basis, an alternative period of time within which the street authority is permitted to determine an application for consent made pursuant to Article 15(5)(b) before consent is deemed to have been given. The rationale for this change is set out above in response to Change Ref. 1.	(9) If <u>Unless otherwise agreed, if</u> a street authority which receives an application for consent under sub-paragraph (5)(b) fails to notify the undertaker of its decision before the end of the period of 28 days beginning with the date on which application was made, it is deemed to have granted consent.	For the same reason as set out in “SCC’s comments on changes made” in Row 1, SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. In any event, SCC maintains its position, again as set out in “SCC’s comments on changes made” in Row 1, that the relevant period should be 56 days, beginning with the date on which the

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC's comments on changes made
				application is received.
1d	Article 16, Access to Works	Article 16(2) has been amended in order to allow for the undertaker and the relevant planning authority to agree, on a case by case basis, an alternative period of time within which the relevant planning authority is permitted to determine an application for consent made pursuant to Article 16(1)(b) before consent is deemed to have been given. The rationale for this change is set out above in response to Change Ref. 1.	(2) Unless otherwise agreed, if a relevant planning authority which receives an application for consent under sub-paragraph (1)(b) fails to notify the undertaker of its decision before the end of the period of 28 days beginning with the date on which application was made, it is deemed to have granted consent.	For the same reason as set out in “SCC’s comments on changes made” in Row 1, SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. In any event, SCC maintains its position, again as set out in “SCC’s comments on changes made” in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.
1e	Article 19, Discharge of Water	Article 19(9) has been amended in order to allow for the undertaker and the relevant person to agree, on a case by case basis, an alternative period of time within which the relevant person is permitted to determine an application for consent or approval made pursuant to Article 19(3) and 19(4)(a) (respectively) before consent or approval is deemed to have been given. The rationale for this change is set out above in response to Change	(9) Unless otherwise agreed, if a person who receives an application for consent under paragraph (3) or approval under sub-paragraph (a) fails to notify the undertaker of a decision within 28 days of receiving an application, that person is deemed to have granted consent or given approval, as the case may be.	For the same reason as set out in “SCC’s comments on changes made” in Row 1, SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. In any event, SCC maintains its position, again as set out in “SCC’s comments on changes made” in Row 1, that the

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC's comments on changes made
		Ref. 1.		relevant period should be 56 days.
1f	Article 21, Authority to survey and investigate the land	Article 21(8) has been amended in order to allow for the undertaker and the highway authority or street authority to agree, on a case by case basis, an alternative period of time within which the highway authority or street authority is permitted to determine an application for consent made pursuant to Article 21(5)(a) or (b) before consent is deemed to have been given. The rationale for this change is set out above in response to Change Ref. 1.	(8) Unless otherwise agreed, if a highway authority or street authority which receives an application for consent fails to notify the undertaker of its decision within 28 days of receiving the application for consent – (a) under sub-paragraph (5)(a) in the case of a highway authority; or (b) under sub-paragraph (5)(b) in the case of a street authority, that authority is deemed to have granted consent.	For the same reason as set out in “SCC’s comments on changes made” in Row 1, SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. In any event, SCC maintains its position, again as set out in “SCC’s comments on changes made” in Row 1, that the relevant period should be 56 days.
1g	Article 41, Crown rights	Sub-paragraphs (a), (b) and (c) of Article 41(1) have been amended to refer to ‘ <i>His Majesty in right of the Crown</i> ’. This change takes account of the Accession of His Majesty, King Charles III in September 2022.	Text not included.	SCC acknowledges and accepts this change and the reason for it.
1h	Article 42, Special category land	Correction of a minor typographical error in Article 42(1) noted during the first Issue Specific Hearing (at time stamp 23.21 in the transcript for Session 4 [EV-017]). The change reflects the fact that use of the word ‘must’ is not appropriate in the context of Article 42(1), notwithstanding the extant guidance	42.—(1) So much of the special category land that is required for the purposes of the exercising by the undertaker of the Order rights must shall be discharged from all rights, trusts and incidents to which it was previously subject so far as their continuance would be inconsistent with the exercise of the Order rights.	SCC has no comments on this provision.

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC's comments on changes made
		at Paragraph 3.3 of Advice Note 15 (Drafting Development Consent Orders).		
1i	Article 46, Defence to proceedings in respect of statutory nuisance	<p>Correction of minor typographical errors in Article 46(1)(a)(ii) and (3) identified in the Local Impact Report submitted by Suffolk County Council and Babergh and Mid Suffolk District Councils [REP1- 045].</p> <p>The changes reflect the fact that a detailed Construction Environmental Management Plan is to be approved by the Secretary of State at the point at which the draft DCO is made rather than at a later date pursuant to Schedule 3.</p>	(ii) relates to premises used by the undertaker for the purposes of or in connection with the construction, maintenance or operation of the authorised development and that the nuisance is attributable to the carrying out of the authorised development in accordance with the controls and measures relating to noise as described in the Construction Environmental Management Plan approved under Schedule 3 (Requirements) or in accordance with the noise levels set out in an environmental permit relating to the construction, maintenance or operation of the authorised development; or	While SCC considers these changes correct the mismatch between former Article 46(1)(a)(ii) and (3) and Schedule 3, SCC maintains its position in respect of the management plans, as set out in paragraphs 17.57 to 17.58 of the LIR [REP1-045] and in its <i>Comments on Applicant's Comments on Relevant Representations</i> [REP2-013].

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC’s comments on changes made
			(3) Where a relevant planning authority is acting in accordance with section 60(4) and section 61(4) of the Control of Pollution Act 1974 in relation to the construction of the authorised development then the local authority must also have regard to the controls and measures relating to noise referred to in the Construction Environmental Management Plan <u>approved under Schedule 3 (Requirements)</u> .	
1j	Article 47, Traffic regulation	Article 47(8) has been amended in order to allow for the undertaker and the traffic authority to agree, on a case by case basis, an alternative period of time within which the traffic authority is permitted to determine an application for consent made pursuant to Article 47(2) before consent is deemed to have been given.	(8) <u>If Unless otherwise agreed, if</u> the traffic authority fails to notify the undertaker of its decision within 28 days of receiving an application for consent under paragraph (2), the traffic authority is deemed to have granted consent.	For the same reason as set out in “SCC’s comments on changes made” in Row 1, SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC's comments on changes made
		The rationale for this change is set out above in response to Change Ref. 1.		In any event, SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days.
1k	Article 48, Felling or lopping	Article 48(5) has been amended in order to allow for the undertaker and the relevant highway authority to agree, on a case by case basis, an alternative period of time within which the relevant highway authority is permitted to determine an application for consent made pursuant to Article 48(4) before consent is deemed to have been given. The rationale for this change is set out above in response to Change Ref. 1.	(5) Unless otherwise agreed, if the relevant highway authority fails to notify the undertaker of its decision within 28 days of receiving an application for consent under paragraph (4), the relevant highway authority is deemed to have granted consent.	For the same reason as set out in "SCC's comments on changes made" in Row 1, SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application. In any event, SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days.
1l	Schedule 1, Associated Development	Correction of a minor typographical error in sub-paragraph (r) of the list of Associated Development in Schedule 1. The inadvertent omission of the words "materially new" in sub-paragraph (r) was identified in the Local Impact Report submitted by Suffolk County Council and Babergh and Mid Suffolk District Councils [REP1-045].	(r) such other works, including scaffolding, working sites storage areas, and works of demolition (which includes but is not limited to demolition of residential properties), as may be necessary or expedient for the purposes of or in connection with the construction of the authorised development and which do not give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement.	SCC considers the change is fine.

Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC's comments on changes made
1m	Schedule 3, Requirements (Paragraphs 1(2) and 1(3))	Minor amendments have been made to paragraphs 1(2) and 1(3)) of Schedule 3 in order to reflect the fact that approval or agreement may, in certain circumstances, be provided by the relevant highway authority. This addresses a matter raised in the Local Impact Report submitted by Suffolk County Council and Babergh and Mid Suffolk District Councils [REP1-45].	<p>(2) Where under any of the Requirements the approval or agreement of the relevant planning authority <u>or the relevant highway authority</u> is required, that approval or agreement must be given in writing.</p> <p>(3) Where any Requirement requires the authorised development to be carried out in accordance or general accordance with matters including a plan, document, or details approved by the relevant planning authority <u>or the relevant highway authority</u>, those matters are to be taken to include any amendments that may subsequently be approved in writing by the relevant planning authority <u>or the relevant highway authority</u>.</p>	SCC considers these changes are fine.
1n	Schedule 3, Requirements (Requirement 4)	Minor amendments have been made to sub- paragraphs (1) and (3) of Requirement 4 of Schedule 3 in order to reflect the fact that any departure from the approved Construction Traffic Management Plan will need to be agreed with the relevant highway authority. This addresses a matter raised in the Local Impact Report submitted by Suffolk County Council and Babergh and Mid Suffolk District	4.—(1) All construction works forming part of the authorised development must be carried out in accordance with the plans listed in sub-paragraph (2) below, unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned, <u>and in the case of the Construction Traffic Management Plan, the relevant highway authority</u> .	SCC considers these changes are fine.

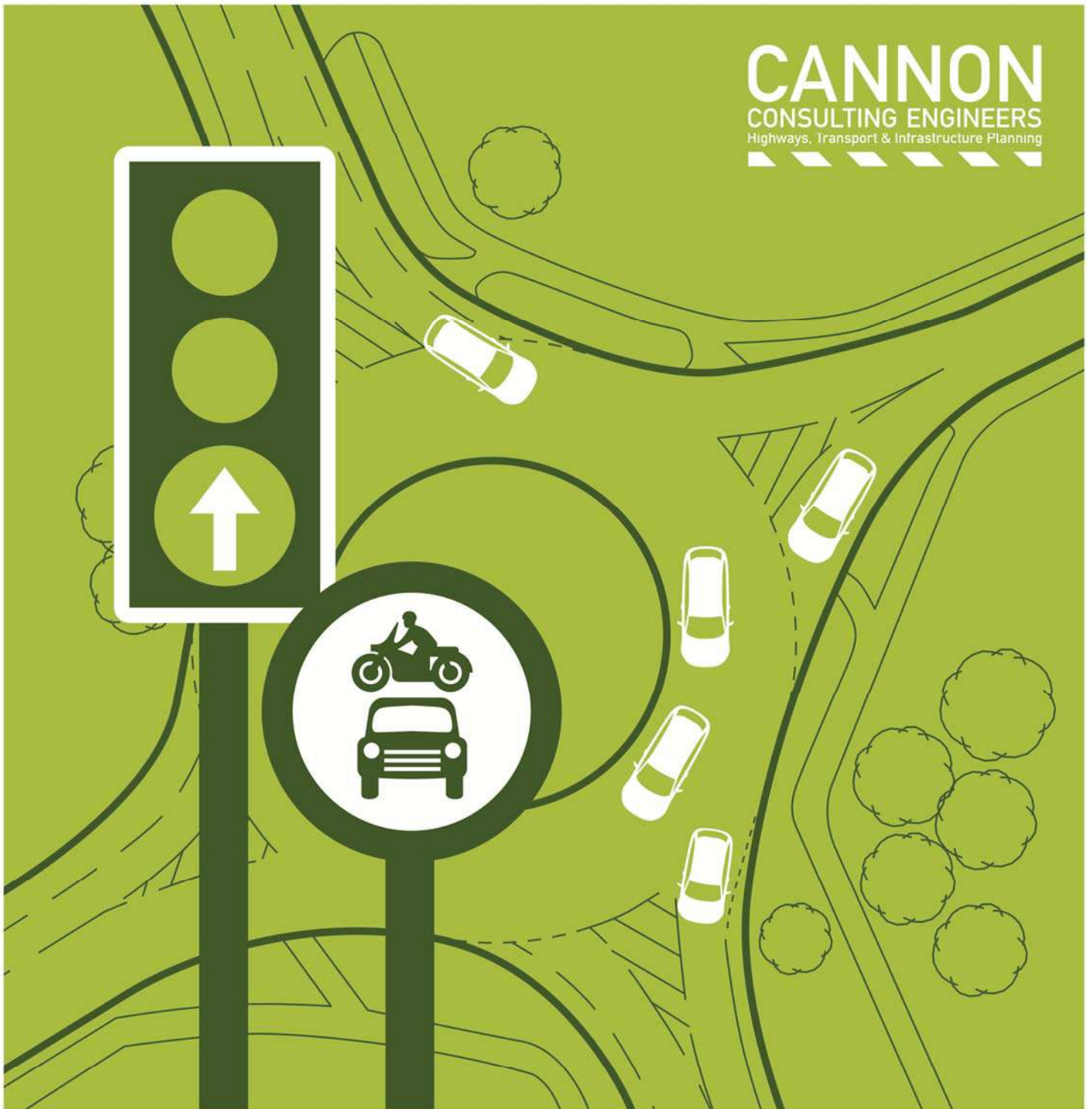
Table 1: 8.4.2 Schedule of Changes to the Draft Development Consent Order – Issue B [REP2-001]				
Ref	dDCO Ref.	Rationale for the Change	Change Made	SCC’s comments on changes made
		Councils [REP1- 045].	(3) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the plans listed in sub-paragraph (2) unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned, <u>and in the case of the Construction Traffic Management Plan, the relevant highway authority.</u>	
1o	Schedule 4, Discharge of Requirements (Paragraph 3(2))	Paragraph 3(2) (which provided for the return of fees paid pursuant to Paragraph 3(1) where an application made pursuant to Schedule 4 was rejected as having been invalidly made or was not determined within the specified period) has been deleted in its entirety. This is in response to comments raised in the Local Impact Report submitted by Suffolk County Council and Babergh and Mid Suffolk District Councils [REP1-045].	(2) Any fee paid under this Schedule must be refunded to the undertaker within 35 days of— (a) the application being rejected as invalidly made; or (b) the relevant planning authority failing to determine the application within 28 days from the date on which it is received, unless within that period the undertaker agrees in writing that the fee may be retained by the relevant planning authority and credited in respect of a future application.	SCC considers the change is fine.

2 Comments on Unaccompanied Site Inspections undertaken at Deadline 2

Note of Unaccompanied Site Inspection (USI5) – 10 October [EV-021]

Ref	Topic	Reference Number	SCC's Comment
2a	Highways	USI5-01	SCC (Local Highway Authority)'s comments on congestion on the A1071 adjacent to the Beagle Roundabout were in part reflections on 'local knowledge' but also the comments made in the transport assessment for DC/21/02671 (see Transport Assessment in Appendix 1). Outline planning permission (some matters reserved, access to be considered) Town and Country Planning Act 1990 - Erection of up to 750 dwellings, and up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements (accompanied by EIA Statement) specifically in 9.1.7 (p62). The traffic function on Google Maps also shows am peak queuing at this location.

Appendix 1 – Transport Assessment of Land North of the A1071



transport assessment

Land north of the A1071,
Ipswich, Suffolk

CCE/V891/TA-01

April 2021

For Taylor Wimpey UK Ltd

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Traffic Flow Diagram T1 2019 Base Case
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Traffic Flow Diagram T3 Development Distribution Parcel A
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Traffic Flow Diagram T7 Total Residential Development Traffic Floe (750HH)
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Traffic Flow Diagram T15 Church Lane & Gipping Way Sroughton Committed Development
Traffic Flow Diagram T16 Total "Other" Committed Development
Traffic Flow Diagram T17 2036 Base + Committed Development
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DRAWINGS

Drawing CCE V891-PL-240-P01 Junction 1 B1113/Swan Hill Signal Junction

Drawing CCE V891-PL-260-P03 Junction 2 Hadleigh Road Signal Junction

Drawing CCE V891-PL-214 Rev A Junction 3 & 4

Drawing CCE V891/283_P01 Junction 6 A124 One Way Access

Drawing CCE V891-PL-251-P01 Junction 7 Site Access

Drawing CCE V891-PL-252-P01 Junction 8 Site Access

Drawing CCE V891-PL-253-P01 Junction 9 Site Access

Drawing CCE V891/-PL-SK-208 Indicative Cycle & Pedestrian link

APPENDICES

Appendix A –Parameter Plans (Access & Movement Plan and Land use Plan)

Appendix B – Non Material Amendment Delegated Report and Decision Notice

Appendix C – SCC Scoping correspondence

Appendix D – HE Scoping Correspondence.

Appendix E – PROW Plan

Appendix F – Cycle Network Plan

Appendix G – Public Transport Information

Appendix H – PIA Data

Appendix I– WG1 Traffic Distribution

Appendix J – Local Model Validation Report (LMVR)

Appendix K - Junction 1 Swan Hill / A1071 / B1113 “Beagle Roundabout” Modelling Output files

Appendix L - Junction 2 Hadleigh Road / A1071 Signalised T-junction Modelling Output files

Appendix M - Junction 3 - Poplar Lane / A1071 Modelling Output files & Junction 4 A1071 / A1214 / Scrivener Drive junction Modelling Output files

Appendix N - Junction 7 Site Access Roundabout Junction with Hadleigh Road Modelling Output files

Appendix O – Junction 8 Site Access Priority T junction with Hadleigh Road (Northern side) Modelling Output files

Appendix P - Junction 9 Site Access Priority T junction with Hadleigh Road (Southern side) Modelling Output files

Document Review Sheet

This document has been prepared for the sole use of Taylor Wimpey UK Ltd. Its content should not be relied upon by others without the written authority of Cannon Consulting Engineers. If any unauthorised third party makes use of this report they do so at their own risk and Cannon Consulting Engineers owe them no duty of care or skill.

Document status

Issue	Date	Author	Checked
01	April 2021	JP/DS	RE

1.0 INTRODUCTION

1.1 Introduction

1.1.1 Cannon Consulting Engineers (CCE) have been appointed by Taylor Wimpey Strategic Land to provide highway and transportation advice in relation to proposals for a residential development on Land North of the A1071, Ipswich, Suffolk.

1.1.1.1 The site is located to the south-west of Ipswich town centre, north of the A1071 and between the London Road (A1214) and the A14. Hadleigh Road bisects the site. **Figure 1** provides a Site Location Plan.

1.2 Development Proposals

1.2.1 The development proposals comprise:-

“Outline planning permission (with all matters reserved except for access) for up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements”

1.2.2 The site is bisected by Hadleigh Road and the site forms several distinct parcels of land. Through initial discussions with the Authorities it was determined that no new access would be provided to the site from the A1071 and as such access to each parcel will be taken from Hadleigh Road. The only additional point of access is an exit only proposed from one of the development parcels onto London Road (A1214).

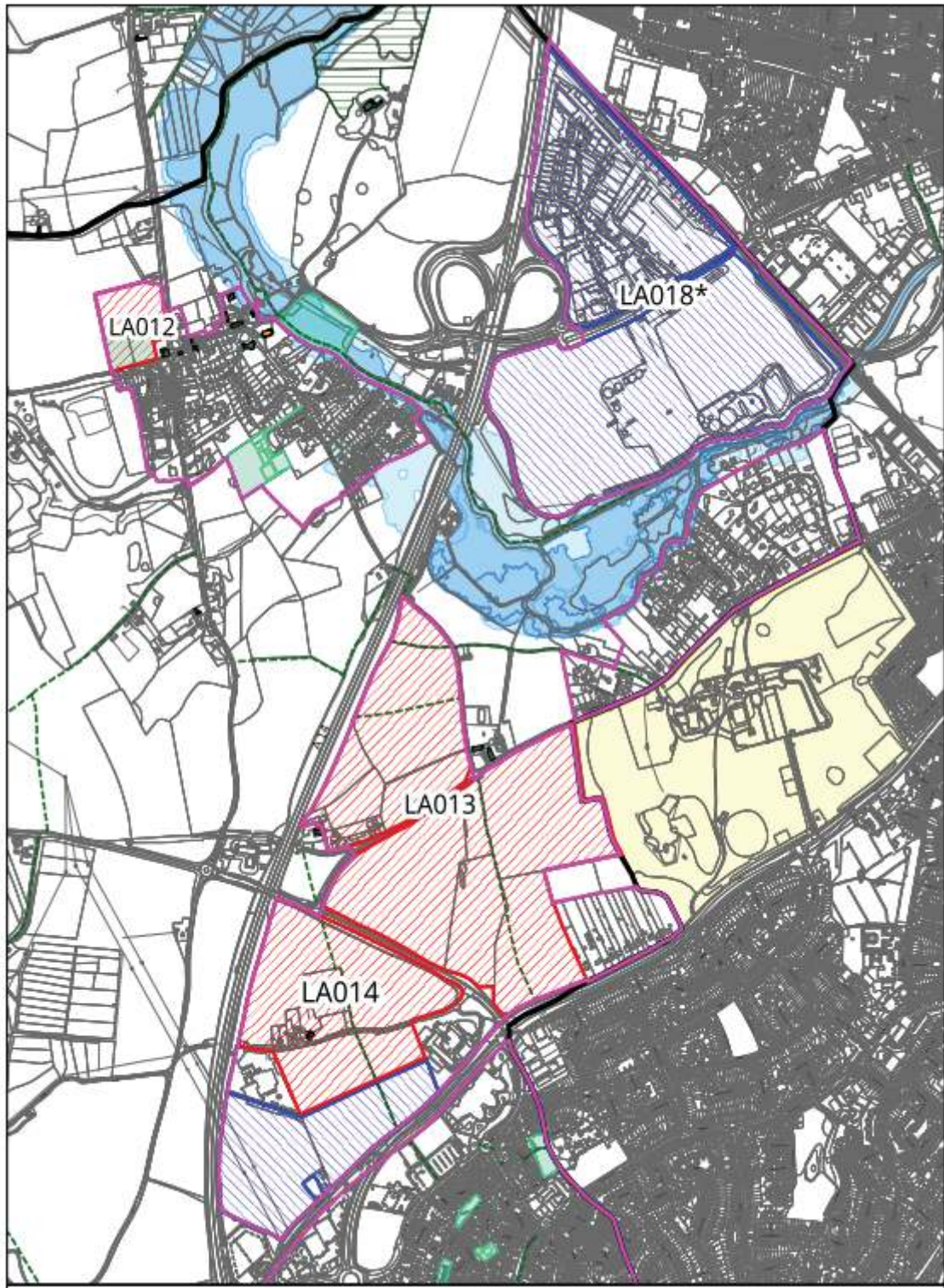
1.2.3 The Site Parameter Plans are included in **Appendix A**.

1.3 Background

1.3.1 The site was originally identified in the Babergh and Mid Suffolk Joint Local Plan – Preferred Options (Reg 18) Consultation – July 2019 for “approximately 1,100 dwellings (and associated infrastructure).”

1.3.2 The site allocation has been updated for “approximately 800 dwellings (and associated infrastructure)” in Babergh and Mid Suffolk Joint Local Plan – Pre-submission (Reg 19) document (November 2020). On the 31st March 2021, the Babergh & Mid Suffolk Joint Local Plan was formally submitted to the Secretary of State for Housing, Communities and Local Government for independent examination.

1.3.3 The site reference is LA013 and the site allocation is shown on the insert overleaf.



Insert 1.1: Site Allocations included in the Babergh and Mid Suffolk Joint Local Plan – Pre-submission (Reg 19) document – November 2020 for Sproughton.

- 1.3.4 Site LA014 is also included in the Preferred Options of the Local Plan as at the baseline position in 2016 the planning permission had not been formally issued. This site is known as Wolsey Grange 1 (WG1). WG1 is located on the southern side of A1071 and comprises an allocated Local Plan site that received resolution to grant permission in 2015. A hybrid application was

submitted for WG1 by Taylor Wimpey in 2015, received resolution to grant in the same year but the permission was delayed and issued on completion of the S.106 agreement in 2018 for up to 475 dwellings, 4ha of employment land, which included A3, A4, A5, D1, D2 and Sui Generis use classes, 1.2 ha of land for primary education use and associated public open space, sustainable drainage systems and highway improvements. The application was a hybrid with part of the development known as Phase 1A in detail and the remainder of the site in outline. Phasing of access and highway works related to the development were linked to the respective parts of the application. A reserve matters planning application was granted for Phase 1A of the development in 2019 that comprised 145 dwellings, associated public open space, sustainable drainage systems and highway works. A Phase 1B application for the remainder of the residential development was submitted and approved in 2020. The dwellings for Phase 1A and 1B are currently being built out and several are already occupied. The total quantum of development within reserve matters planning applications is 305 dwellings, and only the school site and employment land remain to be brought forward.

- 1.3.5 A number of highway works are proposed as part of the WG1 development. These followed extensive assessment of the local highway network within the Transport Assessment and subsequent work supporting the 2015 application. The agreed package of measures proposed to make changes to local junctions to accommodate development traffic without detriment at the end of the previous Local Plan period which was 2025.
- 1.3.6 A subsequent application for a non-material amendment was submitted following the grant of permission in 2018 and in connection with ongoing promotion of the WG2 site. It was identified and considered that the access strategy for WG1 could be amended to reduce the number of access points which were going to limit future capacity in the A1071 corridor. The originally permitted application had a second point of access from the A1071 which formed a fourth arm of a crossroads arrangement at the Hadleigh Road/A1071 signal controlled junction. Work to support this WG2 application demonstrated that the crossroads arrangement did not help the A1071 corridor capacity in the longer term and was not required to serve the WG1 proposals. A number of meetings and focused discussions were held with the Authorities to demonstrate that WG1 could be served by a single point of access. The Non Material Amendment application (reference DC/19/05738) was approved in December 2019. The Delegated Report and Decision Notice included is **Appendix B**.
- 1.3.7 The resulting highway improvements included within the WG1 amended planning permission are as follows:
- WG1 site access from Poplar Lane including traffic signal control at the junction of Poplar Lane and the A1071 to be combined with existing control and improvements to the A1071/A1214 staggered crossroads. This was updated as part of the non-material amendment application to simplify the signal control arrangement and enhance capacity. This improvement also simplified pedestrian movements across the junction and made changes to the location of bus stops to remove bus penetration into the WG1 site which the local operator had confirmed would have detrimental impact on the operations of services and viability.

- Originally, a new access from the A1071/Hadleigh Road junction which was incorporated in a traffic signal crossroads arrangement incorporating some pedestrian facilities which were limited in extent and uncontrolled. This was the most significant change in the non-material amendment which removed the new access arm and therefore enhanced capacity by reducing the number of stages required at the junction. Pedestrian crossings were incorporated within the access arrangement to enhance future connectivity.
- A new access from the A1214 dedicated to the employment land site and incorporating full traffic signal control. This was unaffected by the non-material amendment to the application.
- WG1 residential development is accessed by multiple points of access from Poplar Lane to parcels of land north and south.
- The WG1 masterplans incorporates cycleway connection to the A1071 in the vicinity of the Hadleigh Road junction to facilitate future and improved connectivity.
- The WG1 masterplan includes an emergency access to the A1071 in the vicinity of the Hadleigh Road junction.

1.3.8 WG1 development is also committed to the following off-site highway improvements:-

- Improvement to the A1071/Hadleigh Road junction through upgrading the existing three arm traffic signal controlled and providing controlled pedestrian crossing facilities. This updated layout was part of the non-material amendment.
- Capacity improvements to the A1071/B1113 Sproughton Road roundabout commonly known as the “Beagle Roundabout”. These remain unchanged by the non-material amendment but will be affected by the WG2 development as set out later in the report.
- A new traffic signal controlled junction on the A1214 to provide dedicated access to the employment site.
- Improvements to the A1214/Tesco/Scrivener Drive roundabout that incorporates additional traffic signal control at the A1214 southbound approach.
- Focus on strengthening the public transport services on the A1071 corridor, and making such stops accessible to all residents with a clearly legible network of footways and cycleways providing ease of connectivity throughout the development areas to relocated stops on the A1071.

1.3.9 WG1 is currently under construction with several occupations. Very detailed consideration has been given to how the off-site works associated with WG1 could be adapted to incorporate much of the capacity enhancement associated with WG2 to minimise disruption to the local road network and increase network resilience. This formed part of the discussions with the Authorities related to the allocation and changes that were part of the non-material amendment. Whilst there was still uncertainty as to the likely formal allocation of the WG2 site and at the time of preparing this report the Local Plan is still to be submitted and adopted, the works were shown to have significant benefit to traffic capacity on the network when compared to the original junctions. Given the simplification to access and enhanced capacity

the non-material amendments effectively provided betterment over and above the scheme that was submitted in 2015. This is discussed in detail later.

1.3.10 In the preparation of this Transport Assessment to support Wolsey Grange “Phase 2” (WG2), many of the key points agreed with Suffolk County Council (SCC) for WG1 have been used. This includes:-

- Travel characteristics and trip generation
- Network Assignment and Distribution
- Scope of traffic impact assessment

1.3.11 This is because the fundamental characteristics of the WG2 site are essentially the same as WG1. The main destination for outbound trips by vehicle and other modes in Ipswich. To a lesser extent traffic will use the Copdock Interchange to access destinations further afield via the A12 and A14. The local facilities within the area and school provision related to WG1 are essentially the same though it should be noted that the WG1 Primary School is to be relocated within the WG2 site allocation and expanded to cater for the increased demand.

COVID-19

1.3.12 It should be noted that throughout the process of promoting the development through the emerging Local Plan that existing traffic conditions have been monitored and assessed that provide the baseline for the assessment within this report. Surveys have been carried out in 2015, 2017 and 2019. The baseline conditions described later is related to the most recent traffic data from 2019.

1.3.13 At the time of finalising this report in 2021 we have experienced an unprecedented change in travel patterns and behaviour as a result of the COVID pandemic. The baseline to this assessment pre-dates those changes which are significant and most noted on the highway network through significantly reduced peak hour congestion. At this stage there is no definitive understanding as to what the long lasting effects might be. The emerging Local Plan for Babergh and Mid-Suffolk will likely reflect on this as part of its evidence base which considers the impacts and the resulting Infrastructure Delivery Plan which identifies supporting infrastructure to ensure growth is delivered sustainably. The most recent documentation is still based on pre-COVID assessment and future forecasting.

1.3.14 There is already a significant focus on encouraging patterns of movement by other modes of transport throughout Ipswich and this is endorsed in the emerging Local Plan evidence base.

1.3.15 The single biggest change in working patterns is related to the continuing focus of many employers in the area to support working from home. This is already evident amongst the workforces of the Authorities within Ipswich who have a Policy to share desk space and reduce office attendance on a daily basis. Such changes being spread across all major office based employers in Ipswich will reduce levels of travel and congestion observed across the town network in the future.

1.3.16 The reason for highlighting this is to stress that the assessment is based on pre-COVID traffic surveys and traffic growth projections. The modelling represents the situation that was observed in 2019/20 prior to the epidemic. The resulting mitigation strategy in relation to dealing with that congestion, including the changes to enhance and protect future capacity as part of the WG1 Non-Material Amendment to the access strategy will therefore present a robust worst case scenario. If the work being carried out to lock in benefits of reduced travel, particularly related to employment trips, has a long lasting effect then the mitigation strategy proposed within this assessment might need to adapt to reinforce this emphasis rather than focus on unnecessary highway improvement. This approach will be discussed later in the report with an emphasis on flexibility to be adopted in planning mitigation, the emphasis placed on it and when such works may be required. We consider this approach will be entirely consistent with the emerging Local Plan policies related to managing travel demand as set out in the evidence base to the Local Plan.

1.4 Scoping

1.4.1 This TA has been informed by a number of Scoping meetings with SCC and scoping for a formal Environmental Impact Assessment (EIA). The list below summarises the meetings held in relation to WG2.

- 10.03.21 Meeting with SCC Highways DC Officer for a project update
- 26.11.20 Meeting with SCC Highways DC Officer for a project update
- 02.03.2020 Capacity Assessment Modelling Presentation to SCC including VISSIM modelling of the A1071 corridor.
- 12.12.2019 SCC Highway Scoping meeting
- 10.06.2019 Pre-app meeting with SCC Highways and Babergh Mid Suffolk District Council (BMSDC)
- 12.12.2018 Pre-app meeting with SCC Highways and BMSDC
- 15.11.2018 Concept meeting with SCC Highways and BMSDC
- 25.09.2017 Initial meeting introducing the site to BMSDC, SCC and Ipswich Borough Council (IBC) as part of the emerging Local Plan consultation at that time.

1.4.2 SCC provided a detailed response to the ES Scoping request for the proposed development dated December 2018 (**see Appendix C**). This was used as a base for the scoping discussions as many of the points are still relevant.

1.4.3 Minutes of the most recent Scoping meeting are also included in **Appendix C**. It was agreed the assessment should include the following junction analysis:-

- Impact on Beagle Roundabout (A1071/Swan Hill)
- A1071/Hadleigh Road signalised junction

- A1071/Poplar Lane junction (with WG1)
- A1214/A1071/Scrivener Drive signalised junction
- a full accident analysis on the A1071 from Beagle Roundabout to A1214 junction and Hadleigh Road
- The assessment should be carried out to the end of the Local Plan period 2036.

- 1.4.4 A list of committed developments was also agreed. This is included in detail in section 7.3.
- 1.4.5 A meeting was held on 31st July 2019 with representatives from Sproughton Parish Council, Pinewood Parish Council and the Copdock & Washbrook District Councillor. This meeting was used to answer a number of questions that the Parish representatives had on the proposals. The majority of the questions related to highway impacts.
- 1.4.6 A public exhibition was held on 17th September 2019 at the Holiday Inn, London Road, Ipswich. The exhibition covered both the reserved matters for Wolsey Grange 1B and the outline application for Wolsey Grange 2. The event ran from 3pm until 8pm and was well attended by local stakeholders including a number of local Councillors and 115 local residents.
- 1.4.7 Scoping discussions with Highways England (HE) have also been undertaken. Given the status of an intended strategic improvement to the Copdock Interchange by HE in the period of the Local Plan and work that has been carried out by HE in developing mitigation schemes, it has been suggested to HE that no formal assessment of the A12/14 Copdock Interchange junction is required. An improvement at this junction will form part of the second Regional Investment Improvement Strategy (RIS2) covering projects that will be carried out between 2025 and 2030. Scoping correspondence with HE is included in **Appendix D**.

1.5 Report Structure

- 1.5.1 Following the above summary, the purpose of this TA is to identify the transport impacts and related improvements resulting from the proposed residential development where required. Section 2 of this report describes the application site and existing transport conditions in the vicinity of the proposed development. This includes a review of the existing linkages to the site.
- 1.5.2 Section 3 presents a summary of the relevant transport policies at national and local levels which apply to the application site. Section 4 provides a detailed review of the local highway network and the issues that need to be addressed by this application. Section 5 details the data collection and compares the 2019 surveys collected to inform this review to previous survey data collected to inform WG1 development. Section 6 describes the development proposals, including the scale of the proposals, the access strategy and an overall of the off-site highway mitigation measures.
- 1.5.3 The assessment year and background traffic used to assess the impact of the proposals at the local level is presented in Section 7.

- 1.5.4 Section 8 outlines the estimated trip generation and traffic distribution as a result of the proposed development.
- 1.5.5 The resulting development transport impacts are assessed in Section 9; including capacity assessments of the surrounding highway network and localised assessment of the site access junctions. Proposals to mitigate the impact of the development where required are also included in Section 9.
- 1.5.6 Section 10 summarises the access and movement strategy for sustainable modes of transport and how the design of the development will encourage future sustainable travel.
- 1.5.7 Section 11 describes the construction management relating to the proposals.
- 1.5.8 Section 12 presents the summary and conclusion to this TA.

2.0 EXISTING CONDITIONS

2.1 Introduction

2.1.1 This section of the report outlines the existing local conditions including the provision for walking, cycling, public transport and the local highway network in the vicinity of the site. Connectivity to local amenities and facilities is also reviewed. This will facilitate an evaluation of the opportunities that exist to connect the site with the local area and how to achieve the overarching requirement of planning policy to reduce dependence on travel by the private car where possible.

2.2 Site Location

2.2.1 The proposed application site is located on the western urban edge of Ipswich (see **Figure 1**). The site comprises several separate parcels of land located either side of Hadleigh Road. Whilst the site falls within the administrative boundary of Babergh District Council (BDC), it is located close to the boundary of Ipswich Borough Council (IBC). The site is located within the Parish of Sproughton, but also lies close to the Parishes of Pinewood, Copdock and Washbrook.

2.2.2 The site is broadly triangular in shape and predominantly in agricultural land use. The site is bound by hedgerows, trees and wooden fencing. On three sides the site is bound by the highway network, which includes London Road (A1214) to the east, the A1071 to the south and the A14 to the west. This highway network represents a physical boundary to the site.

2.2.3 The site is bisected by Hadleigh Road, which links Ipswich with surrounding rural villages to the west. Hadleigh Road hosts several residential dwellings.

2.2.4 Abutting the site's eastern boundary lies Chantry Park, a Grade II listed park, which accommodates a number of sports and recreational facilities including dog walking facilities, cricket pitches, Bowling Green and children's play areas.

2.2.5 The site is currently accessed via agricultural access points (suitable for farm vehicles only) along Hadleigh Road, Church Lane and the A1071.

2.3 Local Highway Network

2.3.1 **Figure 1** shows the context of the site in relation to the existing local highway network. The development is bounded by county roads comprising Hadleigh Road, Church Lane, the A1071 and the A1214.

Hadleigh Road

2.3.2 Hadleigh Road is a single carriageway 'C' Classified road that runs from the A1071 towards Ipswich Town Centre and meets again with the A1214 near the River Orwell. Hadleigh Road is a local distributor road that mainly serves residential neighbourhoods. Hadleigh Road meets the A1071 at a signalised T-junction. There is street lighting present along the majority of Hadleigh Road and footway provision is provided on parts of the western side of the

carriageway. Bus stops are located along Hadleigh Road adjacent to and opposite Larchwood Close. Hadleigh Road is subject to a 40mph speed limit along the site frontage. This changes to 30mph at the sites northern boundary as the road leads into Ipswich and becomes more urban and residential in nature.

Church Lane

- 2.3.3 Church Lane is a local unclassified road that serves a small level of residential development and provides access to agricultural land. Church Lane is a no through road which was severed by the A14 at the time it was constructed and that links to Hadleigh Road via a simple priority junction. Beyond the agricultural land, Church Lane provides a connection to a pedestrian and cycle link under the A14 carriageway to Sproughton to the north. This link has street lighting. Church Lane is generally a single vehicle width, and is devoid of footways or street lighting and is subject to a derestricted speed limit.

A1071

- 2.3.4 The A1071 is a two-way, single carriageway road that connects the A1214 at Ipswich south western fringe and Hadleigh approximately 12km to the west. Beyond Hadleigh, the A1071 continues to the A134 near Sudbury. In the vicinity of the site the A1071 carriageway is approximately 9.3m wide. Existing bus stops are located to the north of the junction of the A1071/Poplar Lane. On the south side the bus stop is marked with a sign post and provided with a lay-by. There are no formal pedestrian crossing points to the bus stop on the north side of the A1071. In terms of immediate junctions:-

- The A1071 meets the A1214 at a signal controlled junction.
- The A1071 meets Hadleigh Road at a signal controlled junction.
- The A1071 meets the B1113 / Swan Hill at a four arm priority controlled roundabout.

A1214 London Road

- 2.3.5 The A1214 London Road is the main local distributor road, which links Ipswich Centre to the A12 / A14 Copdock Interchange to the southwest of the site. In the vicinity of the site the A1214 is a dual carriageway that provides two lanes of traffic in both directions. A bus lane is provided on the Ipswich direction, from close to the junction with the A1071 to the Robin Drive junction. From this point onwards, the A1214 becomes a single carriageway that provides one lane of traffic into Ipswich and two lanes out of Ipswich.
- 2.3.6 At the location of the traffic signal junction with the A1071, four lanes are provided on the north-east bound direction, two straight-ahead lanes, one left turn to the A1071 and one right turn to Scrivener Drive. In the southwest-bound direction the junction is provided with three lanes, one left and straight ahead movement, one straight ahead lane, and one right turn lane to the A1071. A four-arm roundabout is located at approximately 800m to the south of the A1071. The roundabout provides access to a Supermarket, a retail park and London Road Park & Ride via the western arm, and to residential neighbourhoods to the east. The roundabout is currently partially signalised.

Swan Hill

- 2.3.7 Swan Hill is a rural local distributor road that connects the A1071 to Washbrook village and onwards to the London Road (former A12).

B1113

- 2.3.8 The B1113 is a rural local distributor road which broadly follows the A14 corridor on a north - south direction. Locally the B1113 connects to Sroughton village and Bramford to the north. The route is again devoid of footways and lighting until the main Sroughton village is reached.

Scrivener Drive

- 2.3.9 Scrivener Drive is a local distributor road that connects to the A1214 at the Tesco roundabout to the south, and the A1071/A1214 junction to the north. The road serves Suffolk One, a 6th Form College and a number of commercial developments (a pub, vets and supermarket) and connects to a network of streets to the east via Shepherd Drive, predominantly residential in nature, providing onward links to Ipswich town centre. Scrivener Drive joins the A1214 to the south at a partially signal controlled roundabout adjacent the Tesco foodstore. To the north Scrivener Drive, joins the A1214 at the signal controlled junction with the A1071.

Strategic Road Network

- 2.3.10 Copdock Interchange is a major interchange at the intersection of the A12, A14 and the A1214. The interchange is noted as Junction 33 on the A12 and Junction 55 on the A14. The interchange is a grade separated junction for the A14, and 'at grade' for the A12. The junction is fully signalised and provides a minimum of two lanes of traffic on the gyratory. The A12 is a major road in England which links Great Yarmouth, Ipswich, Colchester and Chelmsford to London.
- 2.3.11 The A14 is also a major road in England that links Felixstowe Port, Ipswich, Bury St Edmunds, Cambridge, Huntingdon, Kettering to the Catthorpe Interchange with the M1 and M6 motorways near Rugby. The road is a dual carriageway with mostly grade separated junctions. Both the A12 and A14 are part of the Trunk or Strategic Road Network and are managed by Highways England (HE).

2.4 Non-Car Modes

- 2.4.1 Access to the site by modes other than the private car include the following:

- Walking – Pedestrian Networks;
- Cycling – Cycle Route Networks; and
- Public Transport – Existing Bus and Train service provision.

- 2.4.2 **Figure 1**, the Location & Accessibility Plan, shows the local facilities in the vicinity of the site. This is described in more detail below.

2.5 Walking and cycling

- 2.5.1 A review of the existing pedestrian infrastructure, in regards to pedestrian connectivity, around the site has been undertaken. Routes to local amenities and facilities have been examined in relation to the ability of future residents of the site to reach the local points of interest.

A1071 and Poplar Lane

- 2.5.2 A footway/cycleway is currently located along the A1071, on the southwest side of the carriageway from the junction with the A1214 to Poplar Lane.
- 2.5.3 The footway links to the bus stops located north of the Poplar Lane junction on the A1071. The bus stops are called: "Sproughton, Holiday Inn". Footway provision has been provided on Poplar Lane as part of the WG1 development.
- 2.5.4 Public Right of Way - **W-486 016/0#1** runs in a north to south direction through the WG1 site. A PROW plan is included in **Appendix E**. The PROW originates from the north-west of WG2, adjacent to the A14 and runs in a north-west to south-east direction across A1071 and intersects Poplar Lane and the A1214, it then continues south adjacent to the Aldi store to Scrivener Drive.
- 2.5.5 The PROW has been incorporated within the WG1 masterplan.

A1214

- 2.5.6 A shared footway / cycleway is provided along the A1214 frontage that links London Road to Ipswich town centre to the north, and to the south to the Park & Ride, the retail park and London Road the western side of the A14 via an underpass.
- 2.5.7 The traffic signal junction A1071 / A1214 is provided with TOUCAN crossing that allows pedestrian and cyclists to cross the A1071 and the A1214. Both crossings are staggered and provided with appropriate refuge islands.
- 2.5.8 A new crossing point on the A1214 has also been included as part of the WG1 site access proposal for the new junction onto the A1214.

Scrivener Drive / South of the A1214

- 2.5.9 From the crossroads junction pedestrians can travel south and east using the existing pedestrian footway network on Scrivener Drive. This can be used to access Suffolk One and associated bus stops and to access the adjacent Aldi store.
- 2.5.10 Pedestrians can access a wider network through existing residential estates where there is a comprehensive network of footway provision and street lighting, which provides access to facilities such as Sprites Primary School.

2.5.11 To the south-west the Tesco Extra store and Copdock Retail Park can be accessed from the A1214 / Scrivener Drive roundabout where signalised pedestrian crossings are provided and link up with the footway provision provided internally within the retail park.

Hadleigh Road

2.5.12 Northbound from the T-junction with A1071 there is currently no footway provision provided on Hadleigh Road for approximately 180m. From this point there is continuous footway provision on at least the north-western side of the carriageway all the way into Ipswich. Hadleigh Road from the junction of Church Lane into Ipswich forms part of the Advisory Cycle Route network within Ipswich. A cycle network plan is included in **Appendix F**.

2.5.13 Currently there is no controlled pedestrian crossing on Hadleigh Road, however at Larchwood Close drop kerbs and tactile paving is present to facilitate pedestrians accessing the bus stops.

2.5.14 Southbound from Hadleigh Road to the A1214 PROW W-486 014 runs in a north to south direction through the proposed site. This will remain on its alignment and be incorporated within the development masterplan.

Church Lane

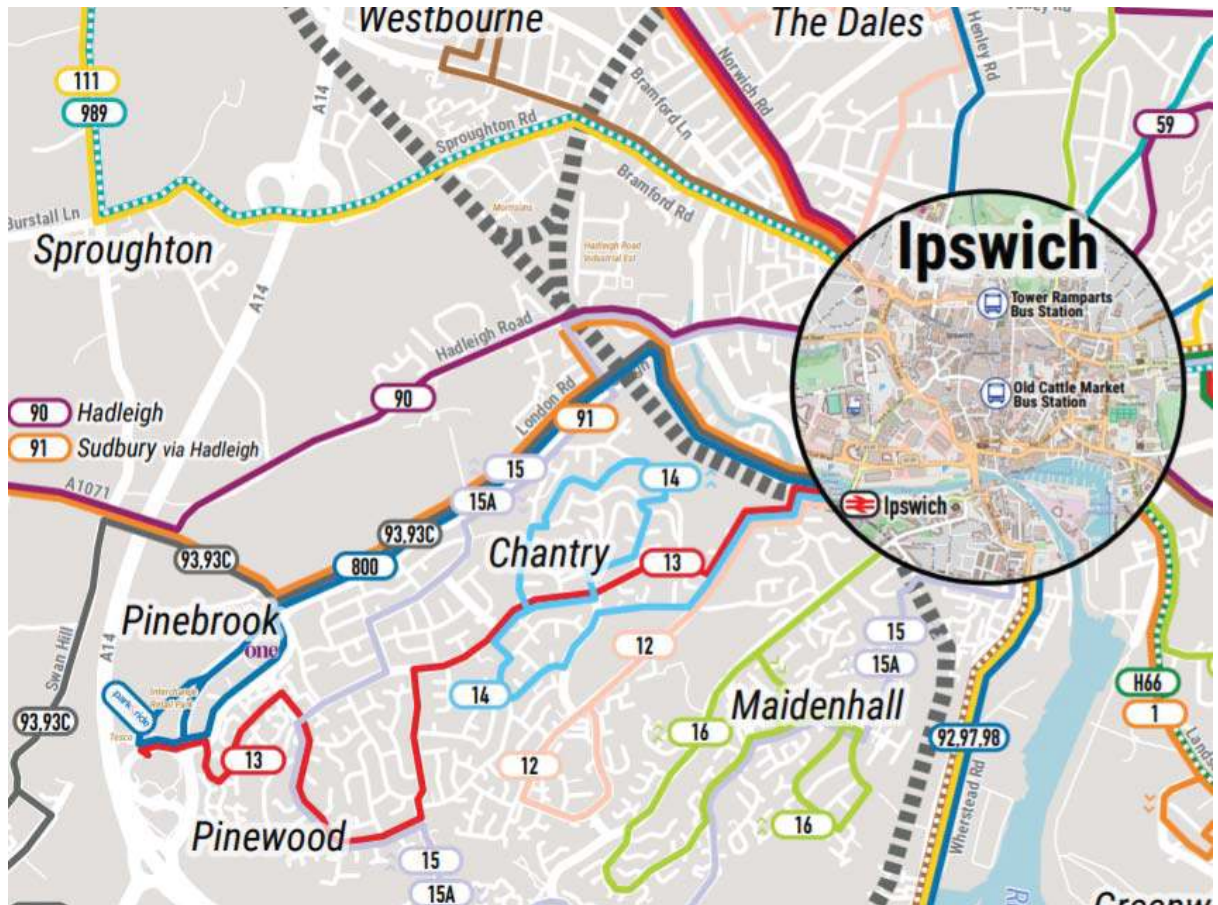
2.5.15 As described above, Church Lane is a local unclassified road that serves a few residential dwellings and provides access to agricultural land. It has neither footways nor street lighting and is subject to a derestricted speed limit. Beyond the agricultural land, Church Lane provides a pedestrian cycle link (PROW W-486 024) under the A14 carriageway to Sproughton to the north. At the underpass this link has street lighting present and continues along the PROW W-486 023 to the west, linking with the B1113.

2.5.16 A network of PROWs can be accessed from Church Lane including PROW W-486 012 to the west and from Hadleigh Road in an east to west direction PROW W-486 011. Both terminate at the site boundary with the A14. They are also retained in the development masterplan.

Bus stop Scrivener Drive Suffolk One	Operator	Route (journey time in mins)	Frequency			
			Mon-Fri	First & Last Bus	Sat	Sun
92	Ipswich Buses	Ipswich (22) Holbrook (38) Brantham (52) Manningtree (68)	One service a day	1610	No service	No service
111	Ipswich Buses	Ipswich Somersham Bildeston Hitcham	One school service a day	0855 1610	No service	No service
800	First in Norfolk and Suffolk	Martlesham P & R (36) - Ipswich Town Centre (10) - London Road P & R (4)	Two services an Hour	0830 1618	No service	No service
Bus stop A1071 & A1214 Chantry Holiday Inn	Operator	Route	Mon-Fri	First & Last Bus	Sat	Sun
95/94	Ipswich Buses	East Bergholt High School	School Service	1601	No service	No service
93/93A/C/X93	Ipswich Buses	Ipswich (7) Capel St Mary (10) East Bergholt (20) Colchester(55)	Hourly	0612 1831	Hourly	No service
97	Ipswich Buses	Ipswich (18) Chelmondiston (40) Shotley Gate (54)	School Service	1556	No service	No service
114/114A	Galloway	Ipswich (9) Claydon (44) Eye (89)	School Service	0908 1556	No service	No service
615	Suffolk Norse	Whitehouse (15) Chantry (4) Holbrook (57)	School Service	0722	No service	No service
Bus Stop Hadleigh Road Opp/adj Larchwood Close	Operator	Route	Mon-Fri	First & Last Bus	Sat	Sun
90	Hadleigh Community Transport	Ipswich (11) Hadleigh (23-28)	Two services a day	2011 2241	Two services a day	Four services a day
91	Ipswich Buses	Ipswich (11) Hadleigh (15)	Every 90 minutes	0651 1825	Every 90 minutes	No service
988	Ipswich Buses (school service)	Chantry (3) Sproughton (6) Bramford (12) Claydon High School(19)	One service a day	0755 1517	No service	No service
Bus Stop Hadleigh Rd Chantry Park	Operator	Route	Mon-Fri	First & Last Bus	Sat	Sun
15A	Ipswich Buses	Ipswich town Centre (23) Stoke Park (13)	Two services an hour	0619 2304	Two services an hour	Hourly

Table 2.1 Bus Services and Frequencies

2.6.3 The insert below shows the bus routes in the immediate vicinity of the site.



Insert 2.2: Extract from SCC Ipswich Bus and Train Map (Valid from Oct 2020).

2.6.4 The bus timetable information demonstrates that there are a number of services in the local vicinity of the site. There are frequent services into Ipswich from the A1071 and Hadleigh Road. Depending on the service number and route, the journey time into Ipswich Town Centre are between 11 and 23 minutes. Service 93/93C provides the most regular service into Ipswich town centre and can be accessed via the A1071 and the A1414.

Rail Services

2.6.5 Ipswich Train Station is located 4km to the east of the site, which is equivalent to a 15 minute cycle ride. Ipswich Train Station has a number of facilities including 228 storage spaces of which 108 are located within a secure compound. A summary of the rail frequencies are provided at **Table 2.2** overleaf.

Destination	Journey Time (min)	Route	Frequency			
			Mon-Sat		Sunday	
			Typical Frequency	First & Last Train	Typical Frequency	First & Last Train
London Liverpool Street	83	Manningtree, Colchester, Witham, Chelmsford, Stratford	Four services an hour	05:12 22:43	Two services an hour	07:35 22:43
Cambridge	80	Needham Market, Stowmarket, Elmswell, Thurston, Bury Ste Edmunds, Kennett Newmarket, Dullingham	Hourly	05:10 21:17	Hourly	07:34 21:05
Norwich	45	Stowmarket, Diss	Two/three services an hour	00:45 06:39	Hourly	08:46 23:44

Table 2.2 Rail Services and Frequencies from Ipswich Train Station

2.7 Personal Injury Accident Review

2.7.1 An analysis has been undertaken of Personal Injury Accident (PIA) data for the most recently available 5-year period between 01/06/2014-01/06/2019. Accident details have been obtained from Suffolk County Council (ECC) for the area shown on Image 2.1 below. Full details of the PIA data is contained at **Appendix H**.



Image 2.1 Extract from accident plot and search area

2.7.2 A total of 43 PIAs were recorded within the study area, of which 35 (81%) were recorded as slight in severity and 8 (19%) were recorded as serious. The accident data has been reviewed and separated into distinct areas. The following areas have been identified:

- A1241 / Scrivener Drive / A1071 junction;
- Hadleigh Road;
- A1071 / B1113 / Swan Hill junction;
- A1241 London Road;

A1241 / Scrivener Drive / A1071 junction

2.7.3 A total of seven PIAs were recorded at the A1241 / Scrivener Drive / A1071 junction of which two were recorded as serious and five recorded as slight. Table 2.3 summarises the personal injury data, full details of the PIA data is contained at **Appendix H**.

Year	No. of Accidents	Severity		Time		Road Surface		
		Slight	Serious	Day	Night	Dry	Wet	Ice
2014	1	1			1		1	
2015								
2016	2		2	2		2		
2017	2	2		2		1	1	
2018	2	2		2			2	
2019								
Total	7	5	2	6	1	3	4	

Table 2.3: A1241 / Scrivener Drive / A1071 junction Personal Injury Accident Data Summary

Hadleigh Road

2.7.4 A total of 15 PIAs were recorded along Hadleigh Road of which 12 were recorded as slight and three recorded as serious. Table 2.4 summarises the personal injury data, full details of the PIA data is contained at **Appendix H**.

Year	No. of Accidents	Severity		Time		Road Surface		
		Slight	Serious	Day	Night	Dry	Wet	Ice
2014	2	2		1	1		2	
2015	1	1		1		1		
2016	4	2	2	1	3		4	
2017	1	1		1		1		
2018	6	5	1	4	2	3	3	

2019	1	1			1	1		
Total	15	12	3	8	7	6	9	

Table 2.4: Hadleigh Road Personal Injury Accident Data Summary

A1071 / B1113 / Swan Hill junction

2.7.5 A total of 8 PIAs were recorded at A1071 / B1113 / Swan Hill junction of which 7 were recorded as slight and one was recorded as serious. Table 2.5 summarises the personal injury data, full details of the PIA data is contained at **Appendix H**.

Year	No. of Accidents	Severity		Time		Road Surface		
		Slight	Serious	Day	Night	Dry	Wet	Ice
2014	1	1		1			1	
2015	1	1		1		1		
2016	1	1		1			1	
2017	3	2	1	2	1	1	2	
2018	1	1		1				1
2019	1	1		1		1		
Total	8	7	1	7	1	3	4	1

Table 2.5: A1071 / B1113 / Swan Hill junction Personal Injury Accident Data Summary

London Road

2.7.6 A total of 13 PIAs were recorded along London Road of which 2 were recorded as serious and 11 was recorded as slight. Table 2.6 summarises the personal injury data, full details of the PIA data is contained at **Appendix H**.

Year	No. of Accidents	Severity		Time		Road Surface		
		Slight	Serious	Day	Night	Dry	Wet	Ice
2014	3	2	1	3		3		
2015	2	2		1	1	1	1	
2016	1	1		1			1	
2017	4	4		3	1	4		
2018	2	1	1	2			2	
2019	1	1		1		1		
Total	13	11	2	11	2	9	4	

Table 2.6: London Road Personal Injury Accident Data Summary

2.8 Accident Summary

2.8.1 The PIA data for the search area was split into areas and reviewed to establish any existing accident problems which may be exacerbated by the proposed development. Whilst all accidents are regrettable it is not considered that these represent an accident pattern that is indicative of an issue with the highway.

2.9 Existing Conditions Update to Reflect Wolsey Grange 1 (WG1) Proposals

2.9.1 As described in Section 1.3.1 there are a number of local highway improvements proposed as part of the WG1 development. WG1 is currently being occupied and the local highway improvements implemented. For context, the WG1 site masterplan can be seen on the Parameter Plans in **Appendix A**. In terms of sustainable transport, the following local improvements are proposed:-

- Relocated bus stop from the eastbound A1071 to London Road A1214.
- High quality pedestrian and cycle access will be provided to connect directly with the existing shared footway / cycleway along the A1214, linking the site with Ipswich town centre and the railway station, and the Copdock Retail Park to the south-west.
- TOUCAN crossings will be retained within the existing A1214 / A1071 signal controlled junction providing Non-Motorised User (NMU) access to Scrivener Drive/ Suffolk One and the on-street footway and cycleway network.
- A new footway/cycleway link will be provided through the development adjacent to the A1071 from Hadleigh Road junction up to Poplar Lane on the southwest side in order to provide a high quality, largely traffic free route for existing users, thereby providing a high quality alternative for pedestrians to avoid using the unmade path on the north-east side of the A1071.
- The Hadleigh Road/A1071 signal controlled junction will be improved and incorporate pedestrian crossings on the eastern and northern arms of the junction.
- A footpath link will be provided along the western edge of the site between Old London Road and Poplar Lane to facilitate NMU movements to the Park and Ride site, Tesco, and the adjacent business premises.
- A new pedestrian/cycle crossing will also be provided on the A1214 at the new all movements junction to the business and leisure park. The route will be extended by making up the existing unmade public footpath adjacent to Suffolk One to link with Scrivener Drive.
- Internally, a comprehensive network of quality footways and cycle facilities will be provided to encourage people to cycle or walk within the site and to gain access to the improved off-site infrastructure.
- Delivery of a Travel Plan to encourage sustainable travel.

2.9.2 When considering access by walking and cycling, reference is made to the Department for Transport Local Transport Note 1/04 – Policy, Planning and Designing for Walking and Cycling. This document refers to the Chartered Institution of Highways and Transportation (CIHT) guidelines for “Providing for Journeys on Foot” which considers suggested acceptable walking distances for various journey purposes such as commuting, walking to school and recreational journeys. These are summarised in the table below.

CIHT Guidelines	Distance		Walk Time	
	Commuting, Walking to School and Recreational	Other Non- Commuter Journeys	Commuting, Walking to School and Recreational	Other Non- Commuter Journeys
Desirable	500m	400m	6.25 mins	5 mins
Acceptable	1,000m	800m	12.5 mins	10 mins
Considered	2,000m	1,200m	25 mins	15 mins

Table 2.7: CIHT guidance 'Providing for Journeys on Foot'

2.9.3 **Table 2.7** provides a summary of walking and cycling distances and journey times to key local services/facilities from the centre of the site. The proposed WG1 pedestrian and cycleway improvements discussed above are included in the assessment as these are committed and will be in place by the time WG2 is constructed. The calculations are based on a walk speed of approximately 80m per minute (4.7kmh/3mph) and a cycle speed of approximately 270m per minute (16.2kmh/10mph) from the centre of the WG2 site. **Figure 1** shows the location of the site in relation to key amenities.

Facility/Service		Distance (Metres)	Walking Category as per CIHT guidance	Walking or Cycling routes	Journey Time (mins)	
				Shortest route	Walking	Cycling
Employment and Retail	The Beagle Pub and Premier Inn	1,000	Acceptable	Northbound along the pedestrian footway provision that is provided along Hadleigh Road to the junction with the A1071. Westbound on the A1071 to the Swan Hill / B1113 / A1071 Roundabout.	13	4
	Hadleigh Road Industrial Estate	2,000	Considered	From the site boundary with Hadleigh Road there is existing footway provision on the north-eastern side of the carriageway which is continuous to the Industrial Estate.	25	7
	Aldi	1,200	Considered	Aldi is located adjacent to Suffolk One and can be accessed from Scrivener Drive using the A1071 /A1214 signal controlled crossing.	16	5
	Tesco Extra	1,700	Considered	Tesco and the Copdock Retail Park can be accessed from the existing footway on the northern side of the A1214. Pedestrian crossings are provided at the junction of the A1214 /Scrivener Drive	21	6
	Copdock Retail Park	1,700	Considered		21	6
Health	Pinewood Surgery	1,700		Pinewood surgery is located to the south of Suffolk One and can be access from here via the existing footway provision on Shepherds Drive.	21	6
	Hawthorn Surgery	2,000			25	7
Education	Suffolk One	1,100	Considered	The existing schools are located to the south of the A1214; students can walk or cycle adjacent the A1071 and cross the A1071 /A1214 signal controlled crossing, or access Scrivener Drive via new pedestrian and cycle infrastructure to be provided in conjunction with the proposed employment access.	14	4
	Sprites Primary School	1,100	Considered		14	4
	Bridge School	1,500	Considered		19	6
	Chantry Academy	2,600			33	10

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Ipswich and Ipswich Railway Station	Ipswich Town Centre	4,100	<p>Route 1 along the A1214 with dedicated on cycle provision, Hadleigh Road / Ranelagh Road junction and Yarmouth Road / West End Road junction, Handford Road to reach Cycle Route National No 51 on Portman Walk to the Town Centre.</p> <p>Cyclists could also commute via Hadleigh Road, which is identified as an Advisory Route on Ipswich Cycle Map.</p>	51	15
	Ipswich Railway Station	4,000	<p>The cycle provision along the A1214 includes off road facilities, such as shared or segregated footways / cycleways. Cyclists and pedestrian will be encouraged to use the path through Gippeswyk Park to reach Gippeswyk Avenue and Ranelagh Road to Ipswich Railway Station. Several TOUCAN or pedestrian crossing are located along the A1214 that allow cyclists and pedestrians to cross the A1214 such as at the A1214 / A1071 junction, near Robin Drive and near Gippeswyk Park.</p> <p>The alternative option (Route 2) would be to cycle to quieter roads, crossing the A1214 / A1071 junction using Scrivener Drive, Sprites Lane, Hawthorn Drive and Birkfield Drive also leading to Gippeswyk Avenue and Ranelagh Road to Ipswich Railway Station. Most of these roads are classified on the Ipswich Cycle Route Map as Advisory Cycle Routes. This route is approximately 3.3km in length (starting point: A1214 / A1071 junction)</p>	51	15

2.10 Summary

- 2.10.1 The table above shows that the proposed development is widely accessible by foot and cycle to a number of key services and facilities and many are within a 25 minute walk and 15 minute cycle ride in accordance with the CIHT guidance for Journeys on Foot.
- 2.10.2 Key facilities that encourage sustainable travel such as the bus stops and railway station are also within the desirable walking distance and cycling distance (in the case of the railway station).
- 2.10.3 The masterplan for WG2 will aim to connect to the existing infrastructure. The site also provides an opportunity to enhance accessibility in the local area through providing new pedestrian and cycle connections from Sproughton to Hadleigh Road and the A1214. This will maximise connectivity for existing residents as well as future residents and has formed a key part of the proposed masterplan.

3.0 POLICY REVIEW

3.1 Policy Overview

3.1.1 This section of the report considers the transport policy background against which the planning application will be assessed. This includes National, Regional and Local Policy. The main policy documents setting the context within which the assessment will be undertaken are:

- National Planning Policy Framework (February 2019)
- Planning Practice Guidance (2014)
- Suffolk County Council Local Transport Plan 2011-2031
- Babergh and Mid Suffolk Joint Local Plan – Pre-submission (Reg 19) document (November 2020)

3.2 National Planning Policy Framework (February 2019)

3.2.1 A revision to the 2012 National Planning Policy Framework (NPPF) was published on 24th July 2018, and later updated on 19th February 2019. NPPF (2019) has been prepared as a result of proposals set out in the Budget 2017, including changes to planning policy and legislation to bring forward more land for development and investment in infrastructure.

3.2.2 Section 2 sets out the overarching objectives to achieve sustainable development at paragraph 10 confirms states that *“so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”* Paragraph 11 confirms that *“plans and decisions should apply a presumption in favour of sustainable development”*.

3.2.3 Section 9 of the document refers to the promotion of sustainable transport.

3.2.4 Paragraph 102 notes that *“transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- *The potential impacts of development on the transport networks can be addressed;*
- *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
- *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net gains in environmental quality; and*
- *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.”*

3.2.5 Paragraph 104 notes that the planning system should *“actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which*

are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

3.2.6 Paragraph 106 notes that *“maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of the Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.”*

3.2.7 Paragraph 108 notes that *“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the site can be achieved for all users; and*
- *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

3.2.8 Paragraph 109 notes that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

3.2.9 Paragraph 110 notes that within this context, applications for development should:

- *“Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

Planning Practice Guidance (2014)

3.2.10 The Planning Practice Guide (PPG) March 2014 aims to provide an accessible web based source for all national planning guidance. In the section relating to Travel Plans, Transport Assessments and Statements, the NPPG defines Transport Assessments and Statements as documents which:

“... are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans).”

3.2.11 The PPG also discusses the relationship between Transport Assessments and Travel Plans:

“Transport Assessments and Transport Statements primarily focus on evaluating the potential transport impacts of a development proposal. (They may consider those impacts net of any reductions likely to arise from the implementation of a Travel Plan, though producing a Travel Plan is not always required). The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or “severe” impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development.”

3.2.12 The PPG identifies key principles governing the production of these documents stating that they should be:

- *proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible;*
- *established at the earliest practicable possible stage of a development proposal;*
- *be tailored to particular local circumstances (other locally-determined factors and information beyond those which are set out in this guidance may need to be considered in these studies provided there is robust evidence for doing so locally);*
- *be brought forward through collaborative ongoing working between the Local Planning Authority / Transport Authority, transport operators, Rail Network Operators, Highways Agency where there may be implications for the strategic road network and other relevant bodies. Engaging communities and local businesses in Travel Plans, Transport Assessments and Statements can be beneficial in positively supporting higher levels of walking and cycling (which in turn can encourage greater social inclusion, community cohesion and healthier communities).*

Local Policy

3.2.13 Local policy is contained within the following documents and these are discussed in turn below.

Suffolk County Council Local Transport Plan 2011-2031

3.2.14 The Suffolk County Council Local Transport Plan (LTP) outlines a 20 year strategy that highlights the council's long-term ambitions for the transport network. The LTP aims to show how transport can play an important part in supporting and facilitating future sustainable economic growth by:

- Maintaining (and in the future improving) transport networks
- Tackling congestion
- Improving access to jobs and market
- Encouraging a shift to more sustainable travel patterns.

Babergh and Mid Suffolk Joint Local Plan – Pre-submission (Reg 19) document (November 2020)

3.2.15 The Babergh and Mid Suffolk Draft Joint Local Plan ('Pre-submission document) provides a framework for the growth of Babergh and Mid Suffolk for development up to 2037, including land allocations. Once adopted, the JLP will replace the existing local planning policies for both Babergh and Mid Suffolk. The Babergh and Mid Suffolk Joint Local Plan - Pre-submission document (Regulation 19) (November 2020) was approved by Babergh Full Council on 10 November 2020 and Mid Suffolk Full Council on 11 November 2020.

3.2.16 On the 31st March 2021, the Babergh & Mid Suffolk Joint Local Plan was formally submitted to the Secretary of State for Housing, Communities and Local Government for independent examination.

3.2.17 The site is included as an allocation in the JLP, policy reference LA013 - Allocation: Land north of the A1071, Sproughton for approximately 800 dwellings (and associated infrastructure).

3.2.18 The policy states that "*The development shall be expected to comply with the following:*

- I. The relevant policies set out in the Plan;*
- II. Landscaping will be used to reflect the sensitivity of the landscape the area, including to the east of the site to mitigate the potential impact on Chantry Park registered park & garden and conservation area;*
- III. An ecological survey, and any necessary mitigation measures are provided;*
- IV. Development is designed to conserve and where appropriate enhance Red House and its associated barn (all Grade II listed) and their settings, including long views from the west, a buffer to the east and screening;*
- V. An archaeological assessment and measures for managing impacts on archaeological remains are provided;*
- VI. An ecological survey, and any necessary mitigation measures are provided;*

- VII. *Rights of Way within the site and within the vicinity of the site should be retained and enhanced to enable access to the countryside and active transport.*
- VIII. *Provision of highway improvements of strategic road network in the area may be required;*
- IX. *Provision of a transport assessment to determine existing and projected capacity and any mitigation required;*
- X. *Provision of cycle and pedestrian links;*
- XI. *A full assessment of increased discharge on the watercourse, and relevant mitigation measures.*
- XII. *If appropriate, measures are used to mitigate against noise pollution from the A14 and odour pollution from Water Recycling Centre;*
- XIII. *Site layout should be designed to take into account existing water mains in Anglian Water's ownership within the boundary of the site;*
- XIV. *A free serviced site of 3ha should be reserved for a new pre-school and primary school plus proportionate contributions towards the build costs;*
- XV. *Contributions to the satisfaction of the LPA, towards secondary school provision;*
- XVI. *Contributions to the satisfaction of the LPA, towards healthcare provision;*
- XVII. *Contributions to the satisfaction of the LPA, towards additional Household Waste Recycling provision."*

3.2.19 This TA is focused on the improvements that can be made along the A1071 corridor as it is recognised as a key corridor into Ipswich. The site offers the opportunity for improved, and new, pedestrian and cycle links in the area, in particular to/from the Sproughton area and north of the River Gipping.

3.3 Summary

3.3.1 The requirement of the draft Local Plan policy related to the site has been considered in detail within the report. As part of the preparation for this planning application there has been an extensive review of highway mitigation and consideration of the impact of development on the local highway network.

4.0 DETAILED HIGHWAY NETWORK REVIEW

4.1 Introduction

4.1.1 This chapter provides a detailed review of the local highway network and its current operation and how the committed WG1 highway mitigation will change the existing conditions up to the period 2025 (the end of the current Local Plan period). This WG2 application will have to consider traffic conditions in 2036 which was the end of the emerging Local Plan. The end of the Local Plan period is now 2037. This will does not change the conclusions of the network review. This Section therefore also considers the likely traffic conditions at the end of the emerging Local Plan and the likely issues that this application will need to assess.

4.2 A1071 Corridor Observations

4.2.1 In 2019 (pre COVID-19) the A1071 experienced congestion in the AM peak period with eastbound traffic queueing at junctions along the A1071 from the A1214 junction to Hurdlemakers Hill which is west of the Beagle Roundabout.

4.2.2 It was noted that the majority of vehicle delay in the corridor was on the eastbound A1071 approach to the Beagle Roundabout where a queue of traffic of around 1km forms for much of the morning peak period. Journey times during this period are typically 8-10 minutes on this approach alone. The Swan Hill (from Copdock) approach to this junction also showed peak period queueing but the delays were less significant than on Hurdlemakers Hill.

4.2.3 The cause of such delay on the approach was observed to be the queueing back of traffic from the traffic signals at the Hadleigh Road junction that causes “exit” blocking from the Beagle Roundabout. As a result, the traffic queueing on the westbound approach to the junction needs to give way to traffic from the B1113 and is penalised. Such delays are a key frustration of drivers trying to get into Ipswich or to reach the A14 & A12 corridors.

4.2.4 It is noticeable that on clearing the Beagle Roundabout that traffic has minimal additional delay once it has passed through the Hadleigh Road junction and onwards towards the A1214.

4.2.5 Overall journey times give context to the delays experienced by regular travellers which are considered severe. It is noted that traffic in the wider area is using alternative routes to reach their end destination as a result of the identified congestion in the A1071 corridor and around the Copdock Interchange.

4.2.6 As already described, the recently permitted WG1 application proposes a number of changes to the local highway network that formed mitigation for their impacts or part of their site access arrangements. These are described below. The WG1 proposals improved the junctions within the corridor to achieve nil-detriment or better in a future year of 2025 which represented the end of the Adopted Local Plan period. WG1 is committed development that is currently under construction. The WG1 proposed improvements provide the baseline against which the impact of the WG2 proposal was reviewed.

WG1 Highway Improvements

- 4.2.7 WG1 development is committed to the following off-site highway improvements:-
- Improvement to the A1071/Hadleigh Road junction through upgrading the existing three arm traffic signal controlled and providing controlled pedestrian crossing facilities.
 - Capacity improvements to the A1071/B1113 Sproughton Road roundabout commonly known as the Beagle Roundabout.
 - A new traffic signal controlled junction on the A1214 to provide dedicated access the employment site. This will be implemented as part of a separate application relating to the employment proposals.
 - Improvements to the A1214 Tesco/Scrivener Drive roundabout that would incorporate additional traffic signal control at the A1214 southbound approach.
 - Focus on strengthening the public transport services on the A1071 corridor, and making such stops accessible to all residents with a clearly legible network of footways and cycleways providing ease of connectivity throughout the development areas to relocated stops.
- 4.2.8 All of these improvements were assessed for the current Local Plan period at 2025, including committed development traffic and appropriate background traffic growth. The ability to accommodate traffic without detriment means that conditions in 2025 would not be materially worse than if the development had not taken place and on this basis the access and mitigation measures were accepted when planning permission was granted in 2015. It did mean that the observed queueing traffic described in the baseline conditions would still have been observed in the future year at 2025, even though the amount of traffic on the network will have increased. There would be no betterment to current traffic conditions and the delays being experienced.
- 4.2.9 As mentioned previously, the improvements above represent the final schemes that will be provided by WG1 and were themselves subject to changes. The main change was to remove an access to the WG1 development that would have made the A1071/Hadleigh Road junction a crossroads. Such a layout was found to limit future capacity improvement and therefore limit the ability for the corridor to accommodate growth in the emerging Local Plan.
- 4.2.10 As discussed earlier in considering the baseline conditions, it is this junction which currently causes blocking back to the Beagle Roundabout resulting in traffic queueing on the eastbound approach with delays of 8-10 minutes. Such conditions are simply a function of the existing traffic signal control junction. A non-material amendment application was made to the WG1 permission to remove the site access and simplify the remaining layout of this junction. The result was a significant increase in capacity and this will in itself benefit the current operation of the junction and reduce queueing on the network.

4.2.11 The timetable for the highways improvements associated with the consented scheme at Wolsey Grange 1 is set out below:

- Works on part of A1071/A1214/Poplar Lane Junction (including new traffic lighting schemes, construction of new traffic islands and re-shaping existing islands and the diverting of major underground services) - April 12th – July 4th 2021;
- Poplar Lane road widening – works to start April 2021;
- Employment junction off A1214 –19th July 2021 – 10th November 2021 (prior to this, temporary roads and footpaths will be installed);
- A1071 / Hadleigh Road / Beagle Roundabout improvements – end of 2021/beginning of 2022;
- A1071/Hadleigh Road improvements to the traffic signal controlled junction to encompass the increased width of the approach lanes required for WG2 and a TOUCAN Crossing for pedestrian movements.

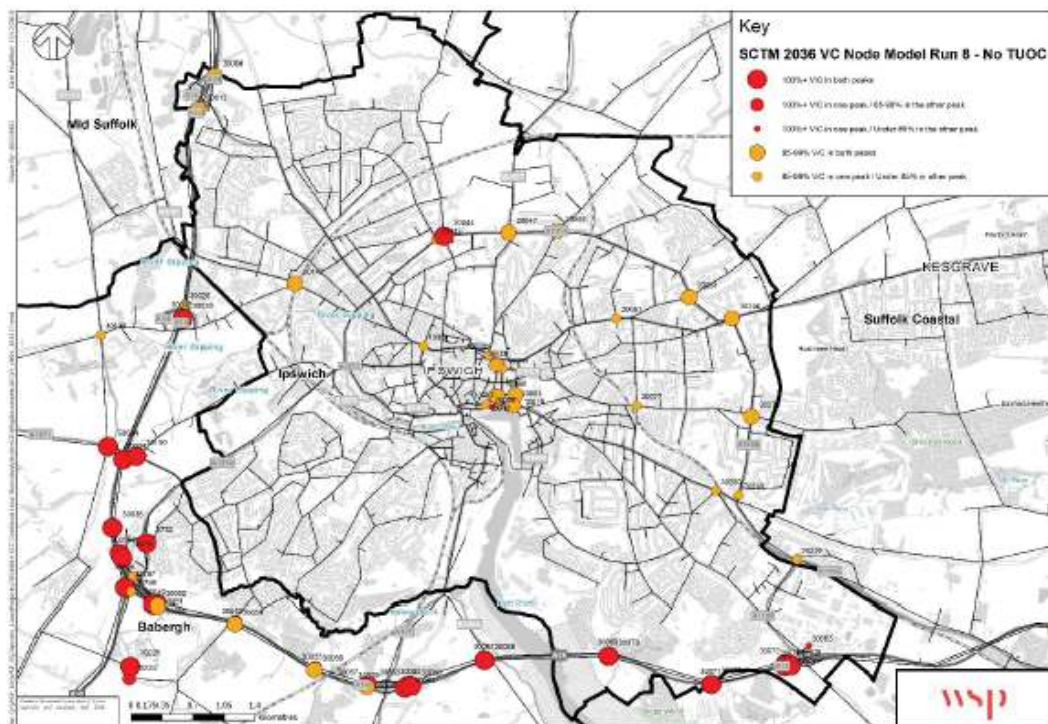
4.2.12 In accordance with the above timescales, many of the local highway improvements will be implemented before construction of WG2 begins in 2026.

Traffic Forecast for the end of the Local Plan Period (2036)

4.2.13 The transport improvements proposed by WG1 provided mitigation to the end of the Local Plan period at the time the application was made, which was 2025. The assessment of WG2 will need to take account of the emerging Local Plan period to 2036. As such, this WG2 application will include both current committed developments, including WG1, and background traffic growth to the new Local Plan period at 2036. The impact of the development at 2036 will need to be mitigated to ensure there is not an impact that could be considered severe in relation to both highway capacity or safety.

4.2.14 There are a series of reports underpinning the Local Plans for Babergh & Mid-Suffolk District Council, Ipswich Borough Council and Suffolk Coastal District Council. These provide evidence regarding the impact of emerging Local Plan growth on the highway network.

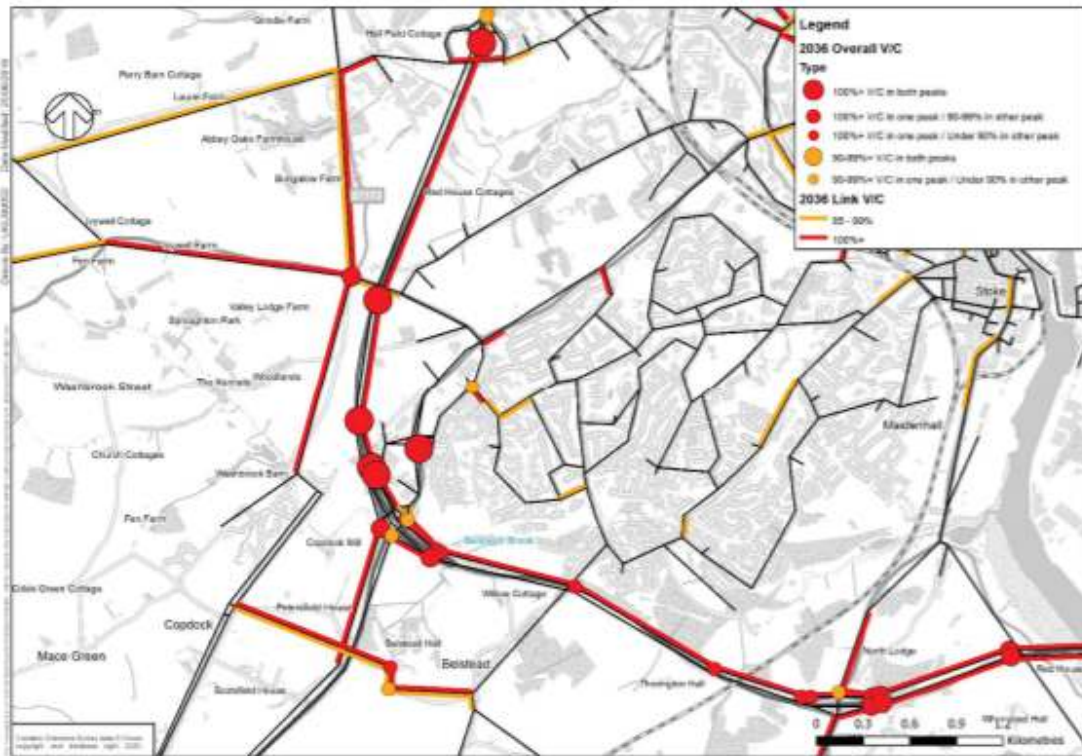
4.2.15 The following diagrams show the impact of travel demand and junctions where traffic flows exceed capacity. Whilst this is high level modelling and a more crude measure than would be provided by detailed junction modelling, these indicators do show that junction operations in the vicinity of the site would be constrained. This reinforces the need for corridor wide intervention to support growth in the Local Plan.



Extract from SCC Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal: Forecasting Report – Volume 2: Suffolk Coastal and Ipswich Preferred Option (Figure 15 January 2019). (Junctions near Wolsey Grange highlighted).

4.2.16 The Suffolk Local Plan Modelling Forecasting Report - Forecasts with demand adjustments (October 2020) was produced by WSP for BDC, IBC, MSDC and Suffolk Coastal as the authorities which form the Ipswich Strategic Planning Area (ISPA). The report was produced in advance of the Babergh and Mid Suffolk Regulation 19 Plan to assess the impact upon the highway network of scenarios for growth within the respective Local Plans for a forecast year of 2036. The report identifies junctions and links that are likely to experience significant peak hour congestion in the future. The report focuses on forecast capacity of the network, implementing a reduction in forecast car demand based on assumptions about the likelihood of achieving a mode shift away from private car travel. Figure 7 from the report (included overleaf) shows the A1071 / B1113 (Beagle roundabout) is anticipated to be over capacity on multiple arms during the AM and PM peak in 2026/36.

Figure 7 – West / South West of Ipswich – 2036 Links and Junctions with V/C 85%+ - With Adjustment



Extract from The Suffolk Local Plan Modelling Forecasting Report - Forecasts with demand adjustments (October2020) – Figure 7.

- 4.2.17 The SCC traffic model report (dated January 2019) noted that “for junctions where V/C is shown to approach or exceed operational capacity, the individual development proposals assessed within the model would, as part of their planning applications, need to consider additional measures to help mitigate any impact”.
- 4.2.18 Whilst this is true, the result of growth in locations such as the A1071 corridor is not wholly related to a single development allocation and as such it results from the cumulative impact of all development in the emerging plan. For reasons set out above, the development allocation itself would only have to deal with its own impact in providing for nil-detriment. However, we have acknowledged the ability to promote a scheme linked to the development of land north of the A1071 that will do more than this.
- 4.2.19 The report goes on to discuss “that improvements in capacity through the removal of bottlenecks whilst desirable in one location can have knock on impacts which would be less desirable than the existing congestion”. The report also acknowledges the role that will be played by sustainable travel strategies to reduce impacts of vehicle traffic.
- 4.2.20 We have discussed earlier that the emerging strategy now considers demand management to be an essential part of managing growth and the infrastructure required. For travel this demand management has been built into later modelling scenarios and this will be enabled

for new developments such as Wolsey Grange through travel planning, providing better walking and cycling infrastructure and access to public transport. With COVID, the ability for office based employers to work from home has been greatly enhanced and expanded. It is expected that lasting work from home patterns will emerge post COVID and this will likely reduce peak period traffic. Whilst forecasting will need to adapt and be modified based on future observations, it is clear that the sort of traffic reductions identified in the Local Plan modelling will be significantly enabled by the move away from office based work for part of the working week.

- 4.2.21 It is considered that growth in the corridor would be experienced irrespective of allocating the land north of the A1071. This is as a result of further development to the east of Ipswich in settlements such as Sproughton, Hadleigh, Bramford and Sudbury, and also given that Ipswich is a key workplace destination and access to the A14 & A12 will draw traffic from those areas via the A1071 corridor.
- 4.2.22 Notwithstanding the observations of traffic congestion in the corridor based on pre-COVID traffic surveys and network modelling in both the Local Plan and at a detailed level, improvement in some form to accommodate future growth would be expected to support the emerging Local Plan.
- 4.2.23 All of the modelling in this Transport Assessment is based on pre-COVID traffic surveys, growth rates and committed development that take no account of potential changes in travel patterns and habits that will result from the pandemic.

5.0 TRAFFIC SURVEY DATA COLLECTION

5.1 Scope of data collection

5.1.1 Extensive traffic surveys have been carried out on the A1071 corridor including Hadleigh Road and London Road (A1214). CCE commissioned traffic survey company A-T-R to carry out an Automated Number Plate Recognition (ANPR) surveys of the corridor in order to understand the existing conditions and traffic routing through this part of the network. The ANPR study comprised the following junctions:

- A1071 / Swan Hill (existing roundabout junction);
- A1071 / Hadleigh Road (existing traffic signal controlled junction); and
- A1214 / A1071 / Scrivener Drive (existing traffic signal controlled junction).

5.1.2 The junctions included in the study area as shown on Insert 5.1 below:



Insert 5.1 – Study Area

5.1.3 The ANPR survey was carried out on Wednesday 22nd May 2019 and recorded vehicle movements and journey times. This information has been used to:

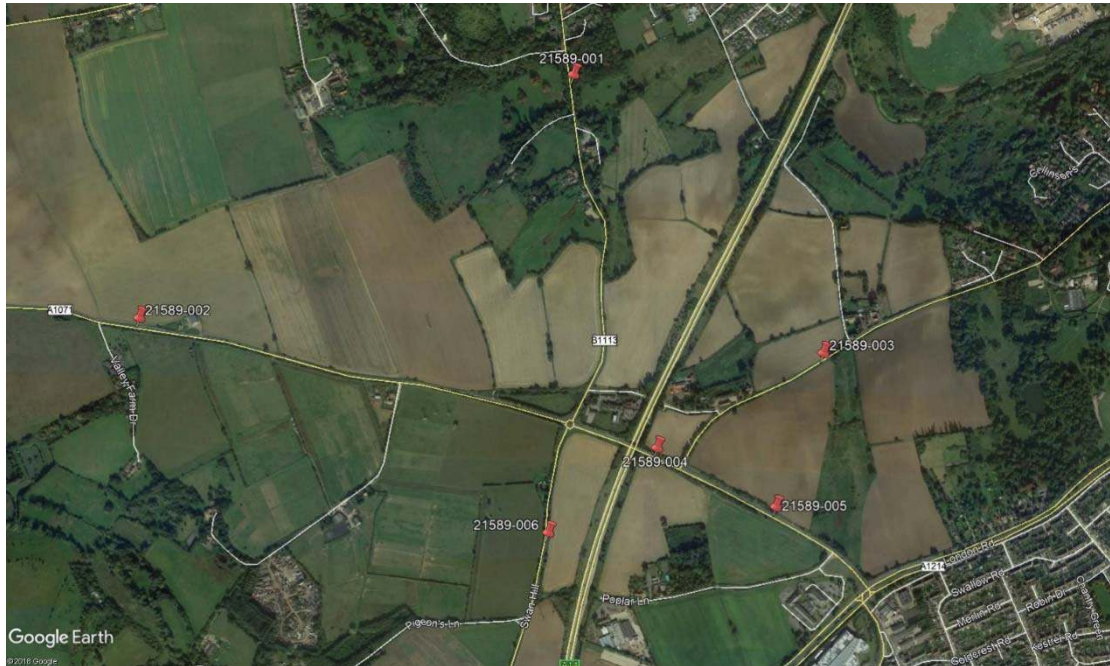
- Estimate the Origin/Destination (OD) Matrices for the corridor network; and
- Calculate the existing journey times of key routes through the corridor.

5.1.4 Manual Turning Counts (MTC), including queue length surveys were carried out over a 12 hour period between 0700 and 1900 on Wednesday 22nd May 2019 at the following locations:

- A1071 / Swan Hill (existing roundabout junction);

- A1071 / Hadleigh Road (existing traffic signal controlled junction); and
- A1214 / A1071 / Scrivener Drive (existing traffic signal controlled junction).

5.1.5 Automatic Traffic Counts (ATCs) surveys were carried out for a seven day, 24 hour period between the 18th and 24th May 2019 at the locations shown in Insert 5.2:



Insert 5.2–ATC Locations

5.1.6 The ATC data was used to confirm that the MCCs were undertaken on a typical day, identify the peak hours, any notable variation across the week. The MTC and ATC data has been used to factor the ANPR data to account for the uncaptured and unmatched routes.

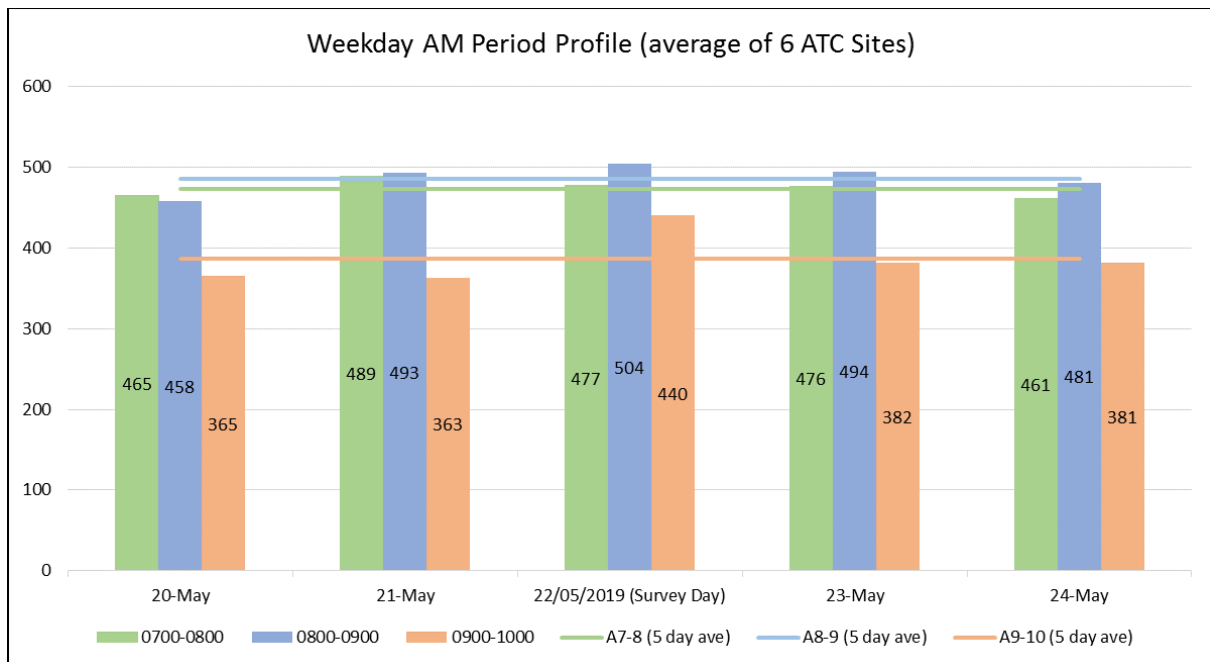
5.2 Data Summary

5.2.1 **Table 5.1** overleaf provides a summary of the ATC data for each link surveyed, including speed and traffic volume.

ATC Location	Direction	Average Speed	85th Percentile Speed	AM Peak	PM Peak
Hadleigh Road (40mph)	Eastbound	38.4	44	241	390
	Westbound	39.5	44.3	629	426
B1119 (40mph)	Northbound	30.7	36.1	462	443
	Southbound	32.8	37.5	422	262
A1071 Hurdle Makers Hill (derestricted 60mph)	Eastbound	43.7	50.1	415	528
	Westbound	46.1	52	480	626
A1071 at A14 Overbridge (40mph)	Eastbound	27.7	36.5	949	829
	Westbound	32.3	37.7	625	825
A1071 East of Hadleigh Rd (40mph)	Eastbound	39.5	45.1	426	502
	Westbound	38.1	43.6	579	583
Swan Hill (derestricted 60mph)	Northbound	37.9	45.6	596	379
	Southbound	41.1	47.1	241	312

Table 5.1: Summary of ATC Survey Data.

5.2.2 The average traffic flow at all ATC locations has been used to assess the relationship of the day of the survey (Wednesday 22nd May) with a typical weekday. This has been completed for the AM period (0700-0900) and the PM period (1600-1700), as shown on the following graphs.



Graph 5.1 – Summary of average ATC data – AM peak period

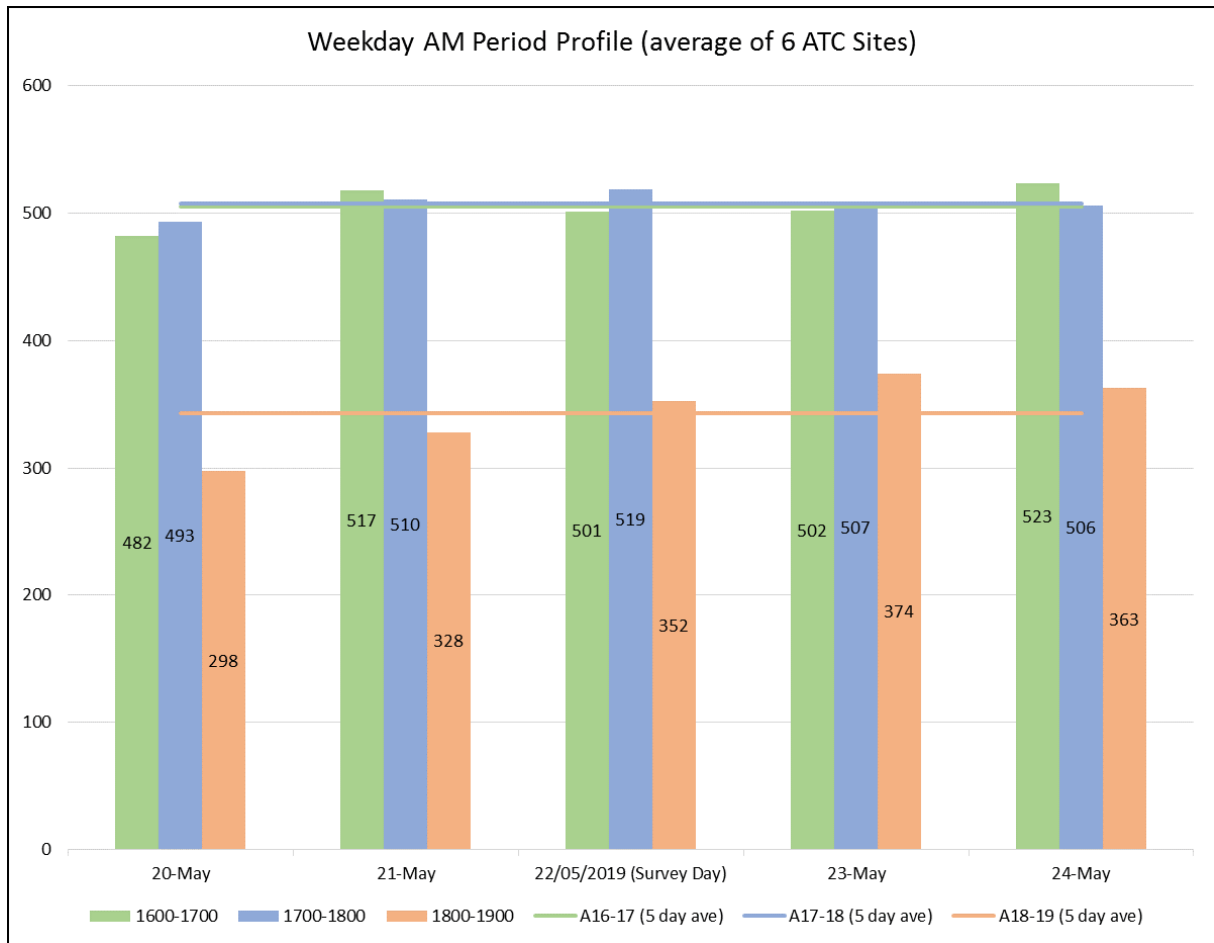
5.2.3 The summary above shows that traffic on the day of the survey (22/05/2019) was higher than the 5 day average in each period. The data also shows that the one hour periods between 0700-0800 and 0800-0900 were the highest in the week.

5.2.4 The daily variations in the period 0800-0900 is:

- +3.7% on the day of the survey;
- -5.8% on Monday 20th May.

5.2.5 The review of the AM peak period shows that the weekday profile is uniform and the day of the survey is the highest in the week, which is therefore considered to be robust.

5.2.6 The average ATC for the PM peak is summarised below:



Graph 5.2 – Summary of average ATC data – PM peak period

5.2.7 The summary above shows that traffic on the day of the survey (22/05/2019) is close to or higher than the 5 day average. The data also shows that the one hour period between 1700-1800 was the highest in the week.

5.2.8 The daily variations in the 1700-1800 period is:

- +2.7% on the day of the survey;
- -2.8% on Monday 20th May.

5.2.9 The review of the PM peak period shows that the weekday profile is uniform and the day of the survey is the highest in the week, which is therefore considered to be robust.

Traffic Flow Comparison

5.2.10 The 2019 traffic surveys have been compared to those obtained as part of the Wolsey Grange Phase 1 Committed Development scheme. The surveys for the Wolsey Grange Phase 1 development were obtained in 2015 and updated in 2017. A comparison of the total junction inflows is summarised in the following tables.

Junction	AM Peak			Change	
	2014 / 2015	2017	2019	2015 v 2019	2017 v 2019
Junction 1 Swan Hill / A1071 / B1113 Roundabout	1,980	N/A	2,327	+17.5%	N/A
Junction 2 Hadleigh Road / A1071 T-junction	1,784	1,809	1,938	+8.6%	+7.1%
Junction 3 Poplar Lane / A1071 T-junction	1,214	1,121	1,260	+3.8%	+12.4%
Junction 4 A1071 / A1214 / Scrivener Drive junction	2,130	2,046	2,258	+6.0%	+10.4%
Junction 5 A1214 / Scrivener Drive / Copdock retail park roundabout	2,876	N/A	2,902	+0.9%	N/A

Table 5.2 – Comparison of Junction Inflows 2015, 2017 and 2019 AM Peak

5.2.11 The table above shows that the traffic between 2014/15 and 2017 remains similar or reduced. The data suggests that the change between 2017 and 2019 is approximately 10% (average of the three junctions). The 2017 data was collected on the 18th July 2017, which isn't typically considered to be a neutral month. As a result it is likely that the percentage change calculated between the 2017 and 2019 data is exaggerated by seasonality changes.

5.2.12 Conversely the 2015 traffic surveys were collected on Tuesday 30th September 2015, which is considered to be a neutral month and therefore the traffic conditions between the 2015 and 2017 surveys are less likely to be affected by seasonality factors. The change between the 2015 and 2019 data is +6.1% (when averaged over the same three junctions) or 7.4% when averaged over all 5 junctions.

Junction	PM Peak			Change	
	2014 / 2015	2017	2019	2015 v 2019	2017 v 2019
Junction 1 Swan Hill / A1071 / B1113 Roundabout	2,142	N/A	2,265	+5.7%	N/A
Junction 2 Hadleigh Road / A1071 T-junction	1,745	1,779	1,848	+5.9%	+3.9%
Junction 3 Poplar Lane / A1071 T-junction	1,134	1,181	1,227	+8.2%	+3.9%
Junction 4 A1071 / A1214 / Scrivener Drive junction	2,142	2,175	2,353	+9.9%	+8.2%
Junction 5 A1214 / Scrivener Drive / Copdock retail park roundabout	3,438	N/A	3,276	-4.7%	N/A

Table 5.3 – Comparison of Junction Inflows 2015, 2017 and 2019 PM Peak

- 5.2.13 The table above shows that the traffic between 2014/15 and 2017 remains similar. The data suggests that the change between 2017 and 2019 is approximately 5.3% (average of the three sites). While the 2017 data was collected during a non-neutral month the results are more uniform, suggesting that there may not be large variations as the result of seasonality factors.
- 5.2.14 The baseline scenario for the capacity assessment within this Transport Assessment will be 2019. Whilst this isn't the year of submission of the application (which will be 2021) it was agreed with SCC that it was the most robust baseline given the fall in traffic as a result of the COVID-19 pandemic in 2020/2021.

6.0 DEVELOPMENT PROPOSALS

6.1 Overview

- 6.1.1 This TA has examines the transport aspects of the proposals for outline planning permission (with all matters reserved except for access) for up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements. The site Parameter Plan is provided in **Appendix A**.
- 6.1.2 The proposals are set in the context of the WG1 site located on the southern side of the A1071 which is a residential development which is currently under construction and in the early stages of occupation. As well as residential development, WG1 has planning consent for the provision of 1.2ha of land for a primary school. From the quantum of residential development proposed through the emerging Local Plan, Suffolk County Council have requested that Taylor Wimpey reserve a 3ha site for a primary school within WG2, which can include an early years facility and may be available for other community use. It is agreed that both school sites on WG1 and WG2 will not be required, and necessity for the provision of the 1.2ha site on WG1 will no longer be required when WG2 is granted planning permission.

6.2 Proposed Access Arrangements

- 6.2.1 **Figure 3** shows the site access locations. The following access points will serve the development :
- Four arm Roundabout junction with Hadleigh Road to serve a small parcel of development on the western side of Hadleigh Road and residential development on the eastern side of Hadleigh Road along with the potential primary school site (Junction No 7 on the Traffic Flow Diagrams, see **Drawing V891/-PI-251-P01**) .
 - Priority T junction with ghost island right turn into land to the north of Hadleigh Road (Junction No 8 on the traffic Flow Diagram, see **Drawing V891-PL-252-P01**).
 - Priority T junction with ghost island right turn into land to the south of Hadleigh Road (Junction No 9 on the traffic Flow Diagram, see **Drawing V891-PL-253_P01**).
 - Exit only onto London Road A1214 (see **Drawing V891/283-P01**).
 - Pedestrian/cycle and emergency access to Church Lane (see **Appendix A**).
 - Each of the above points of access will cater for pedestrians and cyclists. Uncontrolled pedestrian crossings with tactile paving will be provided at each site access arm.
 - The 30mph speed limit along Hadleigh Road will be extended to the junction with the A1071. This will be supported by the new access points into the proposed development, the additional footway/cycleway adjacent to Hadleigh Road and the new crossing points. Visibility splays from the proposed site access junctions have

therefore been shown at 2.4 x 90m in accordance with the proposed speed limit of 30mph.

6.3 Off-Site Mitigation

6.3.1 A number of off-site mitigation measures are proposed. These are summarised below:-

Pedestrian, cycle and public transport connectivity

- Two new bus stops on Hadleigh Road (see **Drawing V891-PL-252-P01**) served by the existing footway to the northern side of Hadleigh Road and a new section of footway on the southern side of Hadleigh Road. An uncontrolled pedestrian crossing with pedestrian refuge island on Hadleigh Road will provide a safe crossing point to access the bus stops.
- Two uncontrolled pedestrian crossings with tactile paving on Hadleigh Road in the vicinity of the northernmost propose site access (Junction 9)
- A parallel crossing (for pedestrians and cyclists, see **Drawing V891-PL-252-P01**) on Hadleigh Road just south of proposed site access Junction 8.
- Provision of a shared footway/cycleway from the A1071/Hadleigh Road junction to the proposed site access Junction 8 (see **Drawings V891-PL-260-P03**).
- Uncontrolled pedestrian crossing and pedestrian refuge island on every arm of the proposed roundabout site access Junction 7 (see **Drawing V891-PL-251**).
- A pedestrian ramp connection from WG1 to the TOUCAN crossing at the A1071/Hadleigh Road junction (see **Drawing V891-PL-260-P03**).
- A new section of footway/cycleway to connect to WG1 footway/cycleway/emergency access onto the A1071 with the TOUCAN crossing at the A1071/Hadleigh Road junction (see **Drawing V891-PL-260-P03**).
- New bus stop locations on A1071 just east of the Hadleigh Road junction to serve WG2 and WG1 residents. Bus patrons will be able to cross the A1071 at the TOUCAN crossing provided.
- The above proposals allow for a safe pedestrian/cycle route from WG1 to WG2 where there is land dedicated for a Primary School which will serve both residential developments.
- A potential link to employment land to the north of the site (the former Sugar Beet Factory site) as indicated on the Parameter Plan.
- An improved pedestrian/cycle connection from Sproughton via the proposed pedestrian/cycle link onto Church Lane. This will provide a connection to the existing A14 underpass (which could also be improved) and through the WG2 site to Hadleigh Road and the A1071.

Highways works

6.3.2 The proposed offsite highways works form a comprehensive package of measures to improve the A1071 corridor and are summarised below. These are discussed in more detail in Section 9.

- **The A1071/B1113 Beagle Roundabout:-** Convert the junction to a traffic signal control crossroads within available highway land. Link the junction to the Hadleigh Road traffic signals to optimise the network as a large part of the problem is caused by traffic blocking back from the Hadleigh Road junction (**CCE Drawing V891-PL-240**).
- **A1071 between the Beagle Roundabout and Hadleigh Road:-** Widen the carriageway to provide 2 lanes in an eastbound (Ipswich) direction, along with a single lane in the westbound direction. Such provision would lead into the Hadleigh Road traffic signal junction which would be linked to the Beagle crossroads. Two lanes in an eastbound direction will significantly improve queue management and the “exit” blocking that currently restricts capacity at the Beagle Roundabout (**CCE Drawing V891-PL-240**).
- **A1071/Poplar Lane/A1214 traffic signal control junction.** An improvement is proposed in this location by the WG1 development. The WG2 development proposes minor amendments to this scheme to include a two lane approach to the junction from Scrivener Drive and a flare lane on the southern A1214 approach to the junction (**CCE Drawing V891-PL-214**).

6.4 Parking Provision

6.4.1 Car parking spaces will be provided in accordance with Suffolk County Council Guidance for Parking (adopted 2014, third edition 2019). The standards relevant to the site are summarised in the table overleaf.

Property Size	Vehicle Minimum*	Cycle Minimum
1 bed	1 space per dwelling	2 secure covered spaces per dwelling (satisfied if garage or secure area is provided within curtilage of dwelling to minimum dimensions)
2 bed	1.5 spaces (1 allocated and 1 shared between 2 units for flexible use); 2 spaces per dwellings when provided within curtilage (or where sharing a space between 2 units is not practical)	
3 bed	2 spaces per dwelling	
4+ bed	3 spaces per dwelling	
Visitor	0.25 spaces per dwelling (unallocated)	
Electric Vehicle Charging		
<ul style="list-style-type: none"> • <i>C3 Dwelling Houses Ducting and suitable consumer unit to allow the install of one wall charging unit per dwelling when required by householder 7.4kw</i> • <i>For residential developments, each dwelling must have the ducting in place to allow a suitable wattage wall charging unit to be installed and connected to a suitable household consumer unit that has the capacity to charge an electric vehicle and run other household electrical appliances when required by the resident.</i> • <i>Garage Provision and Size: - Facilities should be provided for charging electric cars, mobility vehicles and other similar vehicles (where appropriate) and mains power and lighting provided with easy safe access to and from.</i> 		

Table 6.1: Suffolk County Council Car Parking Standards (2019) for residential

development - *Standards exclude garages under 6m x 3m (internal dimension) as a parking space but can include undercroft parking and car ports providing they have no other current or potential use excluding garages less than 7m x 3m internal dimension.

Use	Vehicle Requirement	Cycle Minimum
Education Primary/secondary	Teaching staff: 1 space per 15 pupils plus Visitors: 1 space per 20 pupils	2 spaces per 5 staff plus 2 spaces per 3 pupils Also consider scooter parking

Table 7.2: Suffolk Guidance for Parking: Education (third edition 2019)

6.4.2 Following on from DfT's recent Road to Zero publication and Suffolk County Council's commitment to make the county of Suffolk carbon neutral by 2030, all new developments are required to provide sufficient electric charging infrastructure. For residential developments, each dwelling must have the ducting in place to allow a suitable wattage wall charging unit to be installed and connected to a suitable household consumer unit that has the capacity to charge an electric vehicle and run other household electrical appliances when required by the resident.

6.5 Servicing

- 6.5.1 Paragraph 6.8.5 of MfS notes that the design and layout of developments should help secure opportunities for sustainable waste management. Planning Authorities should ensure that for new developments, there is sufficient provision for the appropriate collection of waste without an adverse impact on the street scene.
- 6.5.2 Further consideration of MfS identifies at paragraph 6.8.9 that the maximum distance that a resident should have to carry their waste is no more than 30m and waste vehicles should be able to get within 25m of a refuse storage point, equating to a maximum distance of approximately 55m from a residential property to an appropriate location that a refuse vehicle can stop within. It should also be noted that whilst the maximum reversing distance of a refuse vehicle is approximately 12m (paragraph 6.8.8), if the road is straight and clear of obstacles or visual obstructions, this distance can be extended.
- 6.5.3 As this is an outline application the internal configuration will be examined in detail as part of a detailed application, however it is considered that the design and layout will adhere to the guidance set in MfS.
- 6.5.4 The access points have been designed to accommodate a refuse vehicle. Swept path analysis for an 11.2m refuse vehicle has been undertaken for each of the proposed site accesses.

6.6 Internal Site Layout

- 6.6.1 The internal road layout is anticipated to comprise of major and minor access roads with footways and direct frontage access and shared surface driveways also with direct frontage access.

7.0 ASSESSMENT YEAR AND BACKGROUND GROWTH

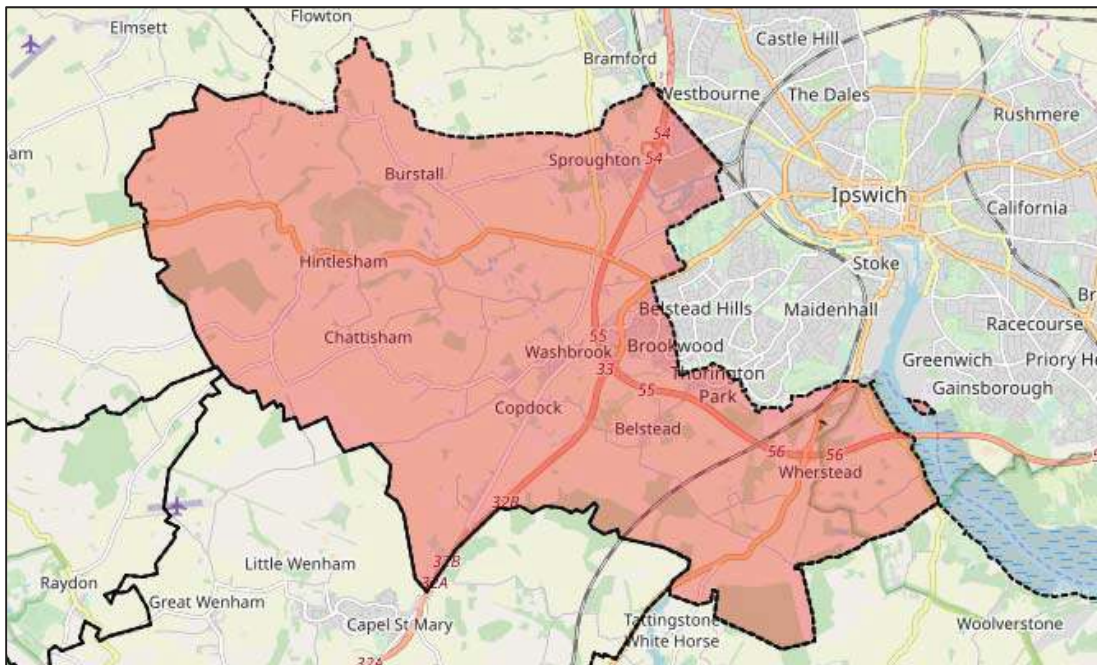
7.1 Introduction

- 7.1.1 As explained earlier in the report. The assessment of the development builds on the previous WG1 scheme which as an allocation in the previously adopted Local Plan was assessed for the period to 2025. The emerging Local Plan is for the period to 2037 and during the preparation of this assessment during 2019/20 the future year being considered was the then stated Local Plan period to 2036. Within Local Plan growth is the draft allocation for this site and other developments in the vicinity. This is represented in the report by TEMPRO growth forecasts that are adjusted to remove the development site itself. What is also added is local committed developments identified by the Authorities during the EIA scoping process.
- 7.1.2 Forecasting future traffic flows does not include for the mitigation proposed in the emerging Local Plan for demand management which will have the effect of reducing the growth in traffic on the network. Neither does it include the potential long term effects of COVID which has been pronounced. What we are assessing is therefore a worst case scenario. The forecasting of growth on the network and the subsequent modelling of the junctions individually or corridors containing several junctions will show where pinch points exist and where the development will potentially have an impact that requires mitigation. Some of the junctions closest to the development will have a more significant impact, before traffic distributes on the wider highway network. An assessment of the developments impact will show whether or not a mitigation scheme needs to be considered at any particular junction on the network that forms part of the agreed assessment
- 7.1.3 Early in the process of discussing this site with the Authorities and on the back of observed congestion in the A1071 corridor it was identified that mitigation would likely be necessary. The WG1 assessment at 2025 provided some mitigation that was combined with site access arrangements. As WG2 was being assessed it was noted that some of these works whilst acceptable for the period of assessment to 2025 to support the WG1 development would effectively become pinch points at 2036. As WG1 was delayed it was decided to make some changes to the WG1 access arrangements and highway works to effectively mitigate for later growth in traffic in the emerging Local Plan period and therefore support the inclusion of WG2. The changes focused on the A1071/Hadleigh Road junction and the A1071/Poplar Lane/A1214 traffic signal control junctions. In relation to the latter, this included the widening of the carriageway westbound to provide 2 lanes, removal of extraneous pedestrian connections to simplify movements and improve the efficiency of the proposed traffic signal controlled junction at Poplar Lane. At the A1071/Hadleigh Road junction a new access arm to WG1 was removed from the junction and the approaches widened to 2 lanes in each direction. This again improved the overall junction operation and increased efficiency and capacity for traffic. Such changes made now as part of the WG1 development are effectively mitigation measures to support growth in the future and overall traffic movements in the corridor.
- 7.1.4 These works are based on background traffic forecasts without the demand management proposed in the emerging Local Plan that will reduce overall forecast growth. A reduction of

circa 15% on all traffic movements within the Ipswich Strategic Planning Area (ISPA) in the Local Plan modelling will have a beneficial effect on junction performance and might have precluded the need for the highway works. We will therefore carry out a sensitivity assessment within the modelling work that follows to consider what effect this has on the junctions and corridor.

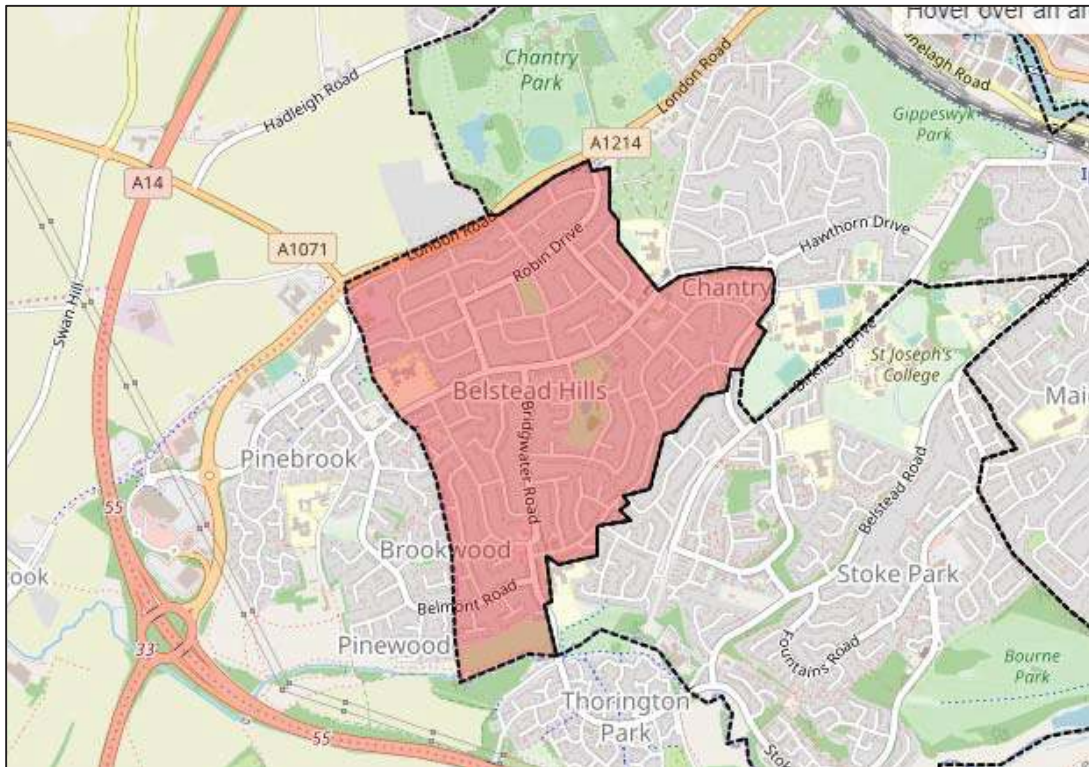
7.2 Forecast Year & Assumptions

- 7.2.1 Growth factors have been applied to the 2019 base data using TEMPRO 7.2 National Transport Model (NTM) AF 15 Dataset for the end of the Local Plan period (2036). The site itself is located in the Super Output Area (SOA) Babergh 005, however this is semi-rural comprising mainly villages on the outskirts of Ipswich albeit does include the more recent developments close to the Copdock Interchange at Pinewood and Pinebrook.



Insert 7.1: Super Output Area Babergh 005 (Source <https://www.nomisweb.co.uk/>)

- 7.2.2 The Super Output Area (SOA) Ipswich 013 is considered to be more representative of the site location. It is a residential area on the southern side of the A1214 located in similar proximity to Ipswich town centre. TEMPRO growth factors for Ipswich 013 have therefore been applied to the 2019 base data.



Insert 7.2: Super Output Area Ipswich 013 (Source <https://www.nomisweb.co.uk/>)

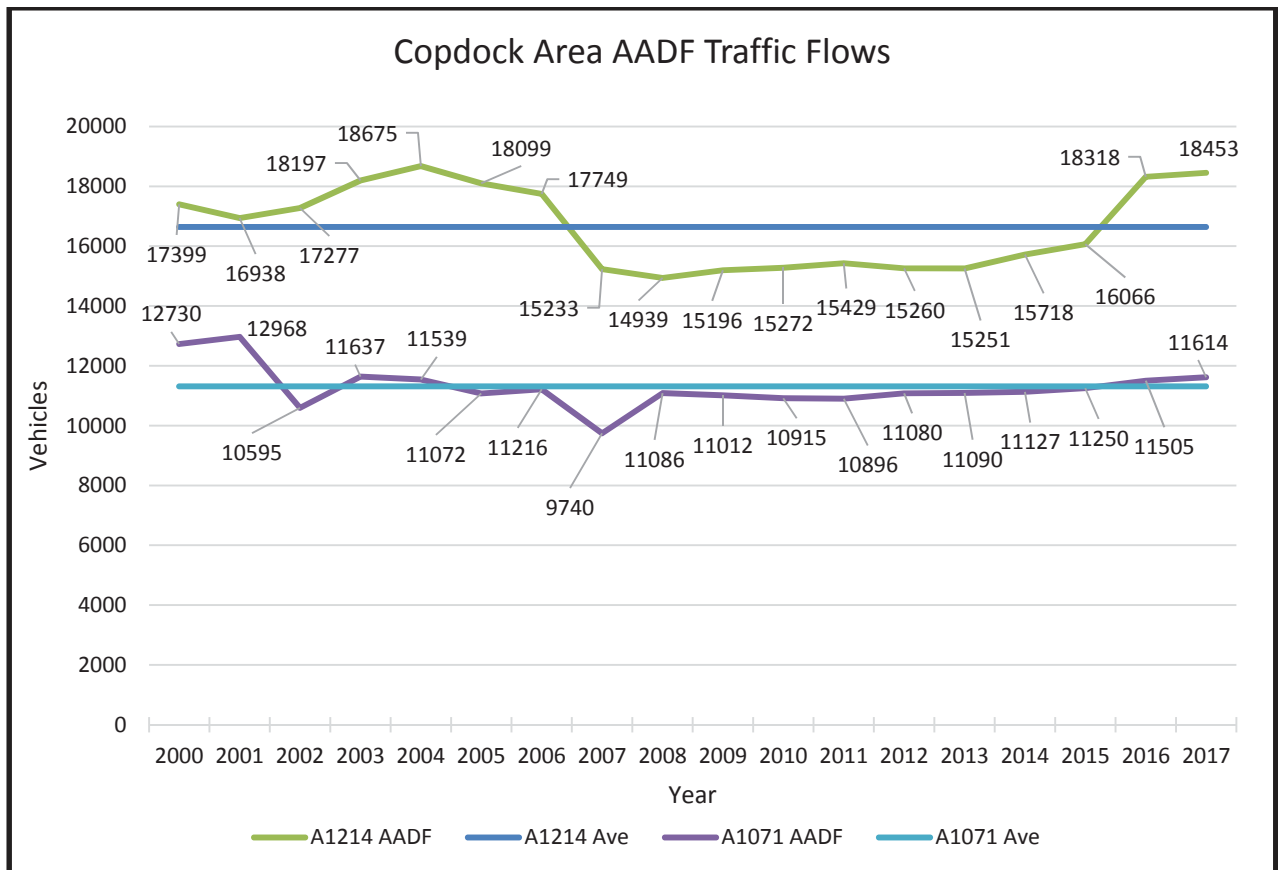
7.2.3 TEMPRO growth facts contain assumptions regarding future housing and job numbers for the local area. This results in an element of double counting when committed development is also included separately in the analysis. The TEMPRO growth factors have therefore been adjusted to remove housing growth as this is considered to be accounted for with the inclusion of the committed developments described in Section 7 and the development site itself.

7.2.4 The NTM adjusted growth factors applied to the 2019 baseline traffic surveys are as follows:

Year	Period	NTM (no Adjustment)	Dwellings removed from assumptions	NTM Adjusted (housing removed)
2019 - 2036	AM	1.2263	565	1.1234
	PM	1.2261		1.1096
	Daily	1.2269		1.1264

Table 7.1: TEMRPO/NTM Growth Factors (Ipswich 013)

7.2.5 The 2019 and 2036 base AM and PM traffic flows are included at **Traffic Flow Diagrams T1 and T2**. Local traffic growth has been considered in more detail. The graph below shows DfT traffic count data for the local highway network at both the A1214 and the A1071. The data presented is Annual Average Daily Traffic Flow (AADTF). This is compared to the average traffic flow. It can be seen that traffic flow on these two links was at its highest between 2000 and 2007, before the economic recession in 2008/10, where traffic flow dropped substantially, particularly in the case of the A1214. It is only recently that traffic levels are starting to increase to pre-recession numbers.



Graph 7.1: DfT Traffic Flow Data for the A1214 and A1071.

7.2.6 As explained earlier in the report, at this stage it is not yet known how the COVID-19 pandemic will affect future traffic flow but if a similar pattern is followed to that of previous recessions, historic data suggest that it could take a substantial amount of time for traffic flows to reach pre-pandemic levels again, if at all.

7.3 Committed Development

7.3.1 The list of committed developments is included overleaf. This includes the Wolsey Grange 1 site permitted in 2018, the residential elements of which are currently being built and occupied. Where available, the traffic flow data has been taken from the accompanying Transport Assessments for each committed development. Each committed development has a corresponding traffic flow diagram for information (See **Traffic Flows Diagrams T8 to T15**). The location of the committed development sites are presented in **Figure 2**. The developments of Snowoasis, Henley Road and Westerfield Road are remote from the site. Traffic growth associated with these developments is considered to be covered by the TEMPRO growth factors.

7.3.2 The WG1 TA included a sensitivity test for a potential employment allocation located south of the Thompson and Morgan premises on Poplar Lane and north of the old London Road. At the time of writing there is no further detail regarding what this site may include and how it will be accessed (either through the existing employment site that is part of WG1, via Poplar Lane or via the retail park to the south). The site is not subject to a planning application, it is

only highlighted as employment use in the Joint Local Plan. For this reason, a site specific trip generation for this potential employment use has not been included in the capacity assessment. Instead it is considered that the application of the TEMPRO growth factors would cover any employment uses in this area. No adjustments have been made to the TEMPRO growth in terms of job numbers. The adjustments made only remove housing growth. The table below summarise the committed developments included the assessment. The locations of the committed developments relative to the site is presented in **Figure 4**.

Committed Development Site Name / Application Reference	Proposal	CCE Comments
Land On The East Side Of Bramford Road, Sproughton - DC/18/02010 / DC/18/02412	Residential development of 54 dwellings with new vehicular access from Bramford Road	Flows included directly Traffic Flow Diagram T11
Former Sugar Beet Factory - DC/17/06235	Erection of a high bay distribution unit (Use Class B8) with ancillary offices (Use Class B1) and gatehouse	Flows included directly Traffic Flow Diagram T13
Belstead House, Sprites Lane Pinewood - B/14/01377	155 no. dwellings, 65 no. bedroom care home and cafe building	Flows included directly Traffic Flow Diagram T10
Land To The South West Of Church Lane And Gipping Way Sproughton - B/11/00745/OUT	Erection of 30 dwellings and associated works	Flows included directly Traffic Flow Diagram T15
Former Manganese Bronze Site (Also Known as Elton Park Works) Hadleigh Road Ipswich - B/17/00037	Up to 128 dwellings (C3) including provision of a 60-bed care home (C2)	TA Demonstrated net decrease in trips. No flows added.
Land North of Burstall Lane, Sproughton - DC/19/00567	114 no. dwellings & land for B1(a) offices and D1 nursery	Flows included directly Traffic Flow Diagram T14
Land Adj Car Parking Area Elton Park Business Centre, Hadleigh Road - 19/00345/FUL Erection of 18 industrial starter units.	Land Adj Car Parking Area Elton Park Business Centre, Hadleigh Road - 19/00345/FUL Erection of 18 industrial starter units.	Flows included directly Traffic Flow Diagram T12
Wolsey Grange 1 (Residential element currently under construction) B/15/00993	Up to 475 dwellings; 4ha of employment use (to include A3, A4, A5, D1, D2 with Sui Generis uses) to form 11,380sqm of Leisure Park.	Flows included directly Traffic Flow Diagram T9
Land At Column Field Quarry Bramford Road Great Blakenham – 1969/10 "SnOasis" a ski centre	"SnOasis" ski centre	Traffic covered by TEMPRO growth factors
16/00608/OUT - Land north of Railway and East of Henley Road	1,100 residential dwellings (use class C3); a local centre, up to 250sqm in use classes A1-A5 and up to 500sqm community centre (D1)); provision of land for a	Traffic covered by TEMPRO growth factors

	primary school (D1); provision of sports facilities,	
14/00638/OUTFL - Land west of Westerfield Road, Ipswich	815 dwellings (C3); a district centre, financial services (A2), restaurants, pubs and takeaways (A3, A4, A5), business uses (B1a), dwellings and institutional residential uses (C2,C3) and non-residential institutions (including health centre (D1) and leisure uses (D2); a primary school (D1);	Traffic covered by TEMPRO growth factors

Table 7.2: Committed Developments. See Figure 3.

8.0 TRIP GENERATION AND DISTRIBUTION

8.1 Vehicle Trip Rates

Residential Proposals

8.1.1 The vehicle trip rates used for the assessment of the WG1 development have been used to assess the WG2 proposals. These trips were approved by SCC in their review of the WG1 applications and provides a consistent approach to the impact analysis.

Peak Hour	Vehicle Trips Rates per Dwelling		
	Arrivals	Departures	Total
AM Peak Hour	0.142	0.424	0.566
PM Peak Hour	0.392	0.247	0.639

Table 8.1: Vehicle Trip Rates: Residential Proposals

8.1.2 It should be noted that they compare favourably with the rates used in the emerging Local Plan supporting transport modelling and are marginally higher which are presented in the insert below from the Local Plan Modelling Report for Babergh and Mid Suffolk (August 2018).

Table 22 - TRICS trip rates (Residential)

Land Use Type	Metric	AM Dep (Origins)	AM Arr (Dest)	AM Two-Way	PM Dep (Origins)	PM Arr (Dest)	PM Two-way
Residential (non Ipswich Borough)	Per dwelling	0.3436	0.1454	0.489	0.19395	0.3071	0.50105
Residential (Ipswich Borough)	Per dwelling	0.319	0.128	0.447	0.150	0.280	0.431

Insert 8.1: Extract from Local Plan Modelling Report for Babergh and Mid Suffolk. Ipswich Suffolk (August 2018) showing the TRICS trip rates used to inform the Local Plan modelling

8.1.3 The trips rates have been applied to the development proposals for up to 750 dwellings. The anticipated vehicle trips are summarised in Table 8.2.

Peak Hour	Vehicle Trips Residential Dwellings		
	Arrivals	Departures	Total
AM Peak Hour	107	318	425
PM Peak Hour	294	185	479

Table 8.2: Vehicle Trips (750 dwellings)

- 8.1.4 It is anticipated that a development of 750 dwellings would generate 425 vehicle in the AM peak and 479 vehicle in the PM peak. The residential vehicle trip rates include trips for all journeys purposes such as commuting, journeys to school, leisure and personal business.

School Proposals

- 8.1.5 The WG2 proposal includes 3ha of land for primary education use. This would accommodate a two form entry school and up to 320 pupils. The WG1 proposal also included a primary school. As described earlier, it is agreed that both school sites on WG1 and WG2 will not be required, and necessity for the provision of the 1.2ha site on WG1 will fall away if/when WG2 is granted planning permission. The vehicle trips rates used for the WG1 assessment for the Primary School have been used to assess the Primary School for WG2. These are summarised in the table below.

Peak Hour	Vehicle Trips Rates - Primary School per Pupil		
	Arrivals	Departures	Total
AM Peak Hour	0.356	0.270	0.626
PM Peak Hour	0.010	0.025	0.035

Table 8.3: Vehicle Trip Rates per Pupil: Primary School

- 8.1.6 The Proposed Primary School will serve both WG1 and WG2. This is reflected in the site access strategy for WG2 and the proposed footway and cycleway connections proposed between WG1 and WG2.
- 8.1.7 In considering the likely demand for school places arising from new development, SCC use a multiplier of 25 primary school pupils per 100 dwellings. Based on this calculation, WG2 will yield 188 pupils and WG1 would yield 119 pupils. This equates to 307 pupils of the 320 potential pupil places at the proposed school.
- 8.1.8 It is considered reasonable to assume that these pupils will in the large part walk or cycle to the primary school and therefore there would be limited traffic generation associated with the school run by pupils attending the school from WG1 and WG2. That said, the residential trip rates used to calculate the trip generation from WG1 and WG2 include trips associated with the school run. The National Travel Survey 2018 reports that 51% of trips in the AM peak period are associated with “education/escort to education” to all forms of school. Therefore the TRICS trip rates applied to the residential proposals are considered to cover any education journeys made by car.
- 8.1.9 An allowance has also been made for pupils who attend the school from outside of WG1 and WG2. Once the pupil numbers from the two sites are taken into account, there is space for around 13 “off-site” pupils. The Primary School trip rate has therefore been applied to 13 pupils that would come from beyond the confines of the site. It should be noted that whilst the trip rates are based on pupil numbers, they take into account all trips associated with a

school, including staff and deliveries, which generally take place outside of network peak hours.

Peak Hour	Vehicle Trips Rates - Primary School per Pupil		
	Arrivals	Departures	Total
AM Peak Hour	5	3	8
PM Peak Hour	0	0	0

Table 8.4: Vehicle Trips (13 Pupils)

8.1.10 As demonstrated by the vehicle trips rates, trips associated with a Primary School only occur in the AM peak. School trips in the afternoon generally do not coincide with the PM peak period.

8.2 Traffic Distribution

8.2.1 The proposed traffic distribution has been based on the agreed distribution for the WG1 assessment. The WG1 distribution is presented on the Traffic Flow Diagram taken from the supporting Transport Assessment and is included in **Appendix I**. The WG1 trip distribution was based on 2011 Census data for all people living in the area “Babergh 005” with the method to travel to work “Driving a car or a van” only, and working in any other area in the UK. Despite the 2011 Census now being 10 years old, it still provides the most up to date picture of where people travel in the peak periods. Outbound trips from the development in the AM peak will be predominantly employment related, followed by trips to primary school education. Primary School education will be provided on site therefore the 2011 Census for journeys to work is the most appropriate data to use to distribute the traffic on the local highway network.

8.2.2 The distribution has been updated to reflect that WG2 will take access from Hadleigh Road. The following updates have been made:-

- The WG1 distribution indicated 31% of traffic would head into Ipswich along the A1214. WG2 is accessed from Hadleigh Road, except for single access from one of the development parcels as an exit only to the A1214 and as such most traffic heading to Ipswich is likely to use this route. Therefore the percentage of traffic heading along the A1214 has been reduced to 5% and the remaining 26% has been distributed along Hadleigh Road.
- The WG1 distribution sent all traffic destined for the A12 southbound via the Copdock Interchange. It is considered that some drivers from WG2 would instead use Swan Hill and join the A12 at Junction 32B via Copdock. 12% of traffic is destined for the A12 southbound. To reflect the WG2 location this has been split 6% via the Copdock Interchange and 6% via Swan Hill.

8.2.3 The development traffic distribution is presented on **Traffic Flow Diagrams T3 to T8**. It is considered that trips associated with the primary school will be most likely to be local trips from the Pinewood area. This is reflected in the traffic distribution.

9.0 JUNCTION IMPACT APPRAISAL

9.1 Scope of Assessment

9.1.1 The table below summarises the development impact on the local highway network. This includes the roundabout junction of A1214/Scrivener Drive/Copdock Retail Park (Junction 5). Whilst this doesn't form part of the detailed highway assessment it has been reviewed in terms of percentage impact. The proposed development will result in a 3% increase in traffic at this junction at 2036. A junction improvement is proposed as part of the WG1 works at this location. The roundabout is currently part signalised on the A1214 northbound approach. The WG1 proposal include the additional signalisation of the A1214 southbound arm.

Junction	2036 Junction Inflows + Committed Development		Proposed Development Junction Inflows		Percentage Impact of Proposed Development	
	AM	PM	AM	PM	AM	PM
Junction 1 Swan Hill / A1071 / B1113 Roundabout	2,872	2,770	115	129	4%	5%
Junction 2 Hadleigh Road / A1071 T-junction	2,439	2,318	270	297	11%	13%
Junction 3 popular Lane / A1071 T-junction	1,774	1,811	151	163	8%	9%
Junction 4 A1071 / A1214 / Scrivener Drive junction	2,943	3,352	155	168	5%	5%
Junction 5 A1214 / Scrivener Drive / Copdock retail park roundabout	3,473	3,977	119	134	3%	3%

Table 9.1: Percentage Impact of the proposed WG2 development on the local highways network.

9.1.2 The table above shows that the impacts resulting Wolsey Grange Phase 2 development proposals is greater than 5% at Junctions 1 to 4. The impact at Junction 5 is less than 5% and therefore it is not proposed to assess the capacity of Junction 5.

9.1.3 It has been agreed with SCC that the following junctions on the local highway network will be assessed:

- Junction 1: The Beagle Roundabout (A1071/Swan Hill)
- Junction 2: A1071/Hadleigh Road signal controlled junction
- Junction 3: A1071/Poplar Lane junction
- Junction 4: A1214/A1071/Scrivener Drive signalised junction

- Proposed site access junctions (Junctions 7, 8 and 9 as shown on **Figure 2**)

9.1.4 The A12 Copdock Interchange has not been included in the detailed junction modelling. The traffic impact at the Copdock Interchange (junction 55) as a result of the WG2 development is negligible at around 1.5%. Based on this it is not considered that any further detailed analysis of the junction is required as part of the WG2 planning application. There has been significant work undertaken to date to inform proposals for a large improvements scheme at the Copdock Interchange which will form part of a RIS scheme which will be implemented between 2025 and 2030. This will be complimented by improvements works proposed by WG2 to the A1071 corridor on the local road network. This has been discussed separately with Highways England.

9.1.5 As explained earlier, the capacity assessment of the local highway network has been undertaken for the following scenarios:-

- 2036 + Committed Development
- 2036 + Committed Development + Development

9.1.6 The impact of the proposed development has been considered with the highway improvements proposed as part of the WG1 development and as explained earlier this includes the recent changes to improve access and network efficiency in the corridor to support future growth in traffic flows.

9.1.7 Section 4 described in detail the existing local highway condition and discussed the existing congestion on the A1071 corridor. The observations are summarised below:-

- It was noted that the majority of vehicle delay in the corridor was on the eastbound A1071 approach to the Beagle Roundabout where a queue of traffic of around 1km forms for much of the morning peak period.
- Journey times during this period are typically 8-10 minutes on this approach alone.
- The cause of such delay on the approach was observed to be the queueing back of traffic from the traffic signals at the Hadleigh Road junction that causes “exit” blocking from the Beagle Roundabout. As a result, the traffic queueing on the westbound approach to the junction needs to give way to traffic from the B1113 and is penalised.
- It is noticeable that on clearing the Beagle Roundabout that traffic has minimal additional delay once it has passed through the Hadleigh Road junction and onwards towards the A1214.

9.1.8 The review of the existing issues highlighted that a corridor approach to reduce congestion is required, modelling each junction independently will not accurately reflect what is happening on the ground. This section discusses the use of a VISSIM model to accurately assess the corridor and resolve the exiting blocking issues, thus reducing the queues on the A1071.

9.1.9 The initial corridor review looked at simplifying the future network with the WG1 changes and making sure that any proposals as part of WG1 did not restrict future highway capacity.

Secondly, CCE focused on improvements for the future year of 2036 to deal with the residual capacity issue.

9.2 Progression through the A1071 corridor

9.2.1 The A1071 corridor review comprises the A1071 / Swan Hill, A1071 / Hadleigh Road and A1071 / A1214 junctions. A zonal network was mapped and an Automatic Number Plate Recognition (ANPR) survey was carried out to understand journey times through the corridor. The ANPR data along with the Manual Turning Count (MTC) and Automatic Traffic Count (ATC) surveys have been used to calculate network origin/destination matrices and journey time profiles for key routes through the network.

9.2.2 Microsimulation software VISSIM has been used to produce a calibrated network model for the 3 hour AM peak period which has been validated using observed survey information. The AM peak suffers from congestion on the eastbound movements through the network, with high delay, particularly at the A1071/Hadleigh Road junction. The extent of the network model are shown below:

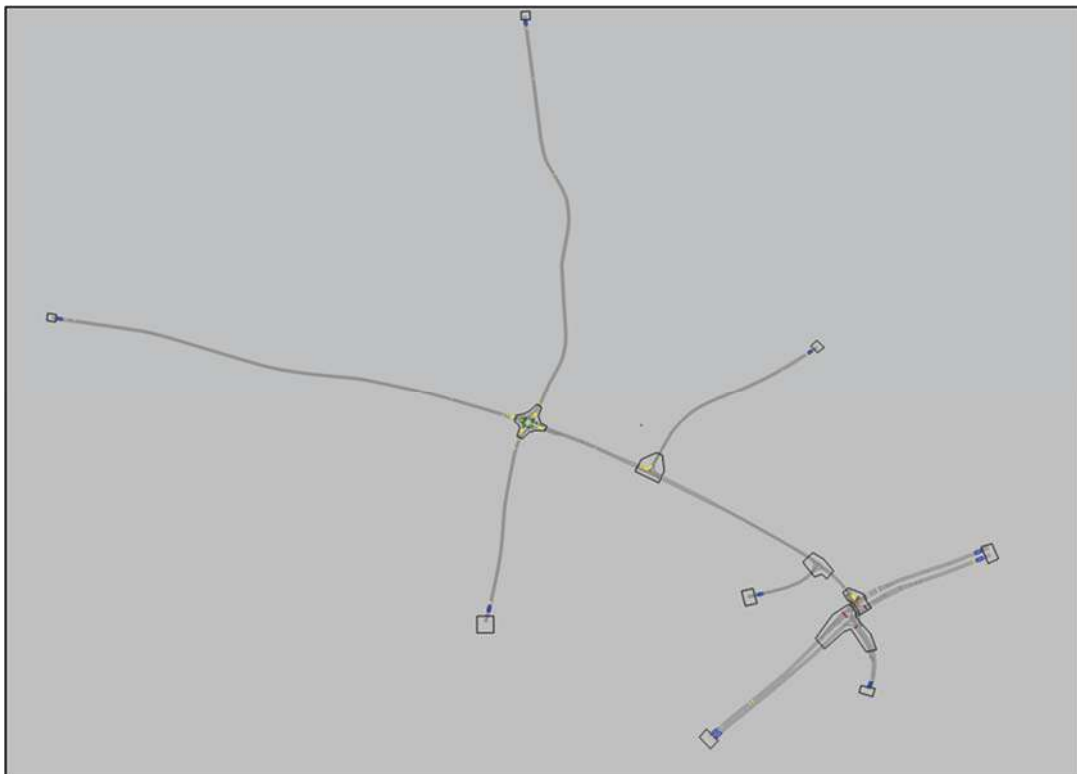


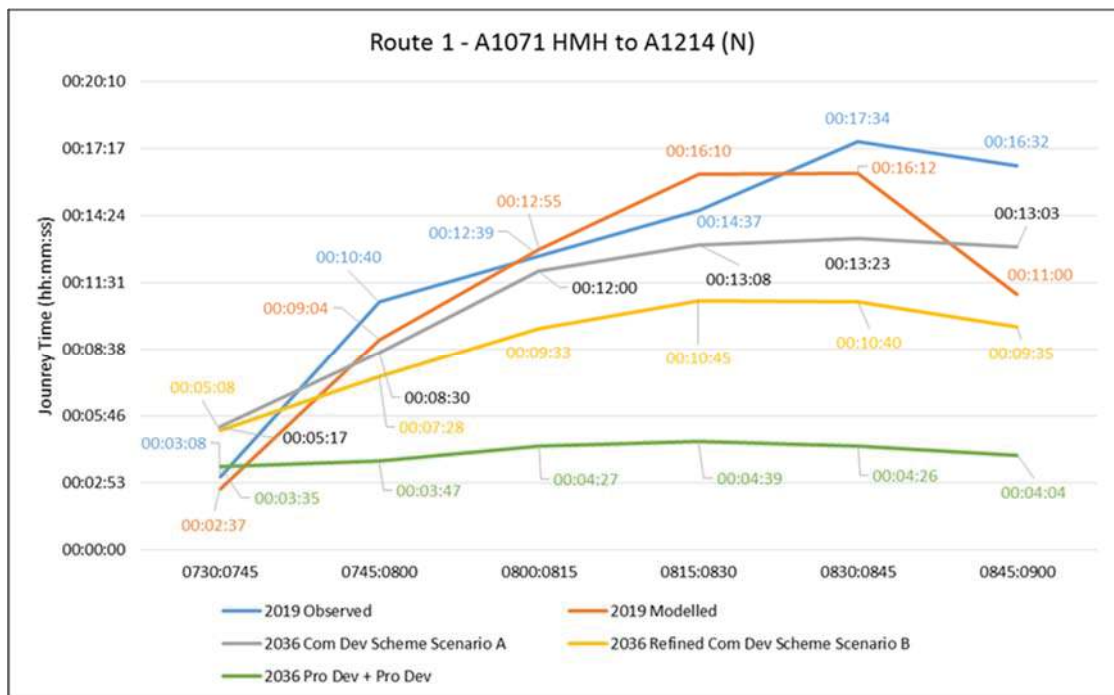
Image 9.1 – VISSIM Network Model Extents

9.2.3 The validation process confirms the acceptability of the base model based on Transport for London's (TfL) Vmap process which is considered to be the most appropriate approach to refined modelling in urban corridors. A Local Model Validation Report (LMVR) has been prepared setting out the methodology used to construct, calibrate and validate the model. The LMVR is contained at **Appendix J**.

9.2.4 The validated base model has been updated to include the junction improvements secured as part of the Wolsey Grange Phase 1 development. This committed development model was

run with the future year forecast traffic flows to establish the impact of the proposed development on journey times/delay. The review identified that the trips associated with the proposed development would result in an increase in overall journey times through the network.

9.2.5 Mitigation at the three junctions has been developed using detailed capacity models for each junction as summarised in the Section below. These improvements have been coded into the VISSIM model and the model reruns. The journey time Graph 7.2 for Route 1 (A1071 Hurdle Makers Hill to A1214) is presented below:

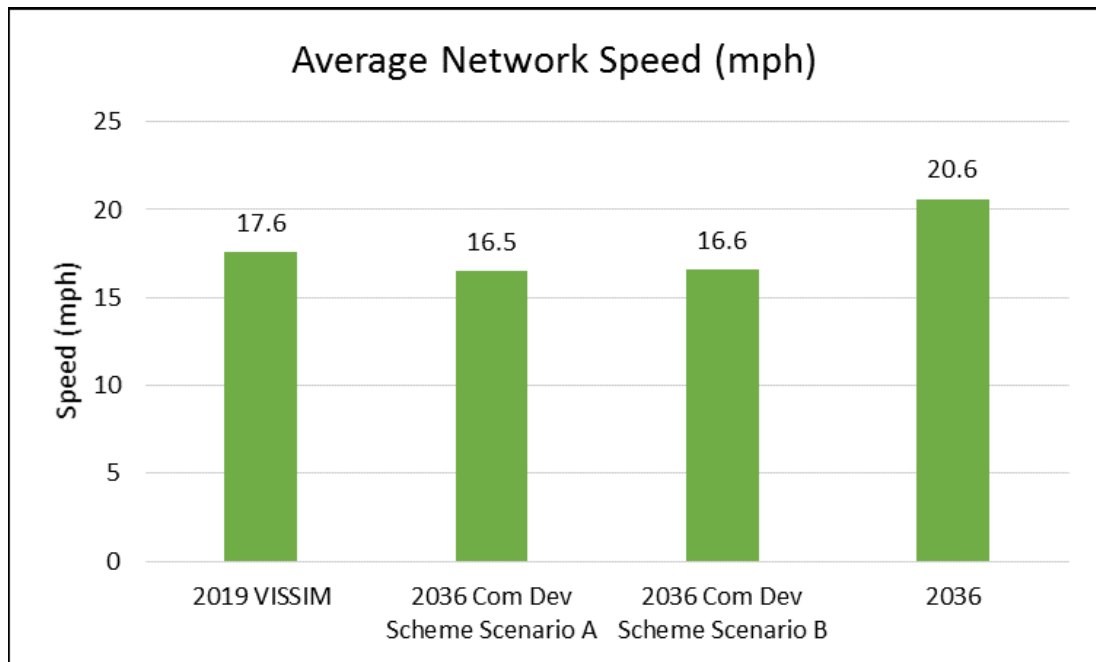


Graph 9.2 – Route 1 Journey Time Summary

9.2.6 The graph above shows that the package of works secured as part of the Wolsey Grange Phase 1 and additional works as part of Wolsey Grange Phase 2 will provide a substantial reduction in journey times within the network. In particular the journey time on Route 1 from A1071 Hurdle Makers Hill (EB) to A1214 (NB) is predicted to reduce by 71% when compared to the 2019 observed base values.

9.2.7 The overall network performance on all test movements has been estimated as a 40% reduction when compared to the 2019 observed base. This represents a significant improvement to the network.

9.2.8 Average speed data within the model has been reviewed which confirms that the speed will increase from 18 mph to 21 mph. This indicates that the congestion is eased and that there will be improved free flow conditions. The summary graph is replicated overleaf.



Graph 9.3 – Network Average Speeds (mph)

- 9.2.9 A corridor approach to the improvements was informed by detailed observations of the issues. These observations led to the conclusion that the originally proposed WG1 access at A1071/Hadleigh Road junction would form a constraint in the future if it were to be implemented. An alternative solution was therefore proposed that would remove the blocking back issues. This then enabled further consideration of what could be done at the “Beagle Roundabout” which, even with exit blocking from the Hadleigh Road junction removed, would have still struggled in capacity terms on other arms without further improvements. This approach has resulted in the whole corridor performing significantly better in the future.
- 9.2.10 In summary it is considered that the residual impacts of the Wolsey Grange development are not severe and in terms of journey time savings will provide a significant betterment. The proposals will also provide the opportunity for improved network management.

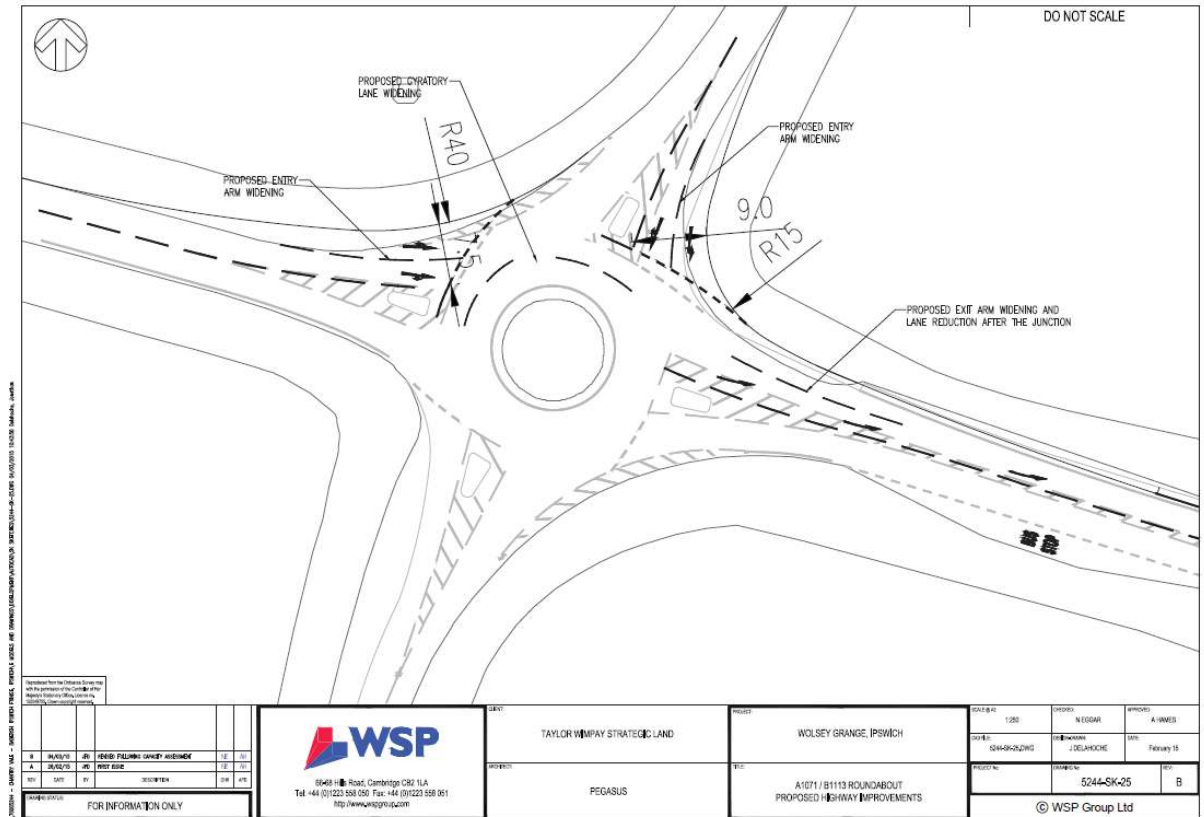
Junction Capacity Analysis

- 9.2.11 It was quickly identified that a corridor approach to the network was required to solve congestion issues which could not be done solely with the use of separate models. For example, early identification of the blocking back issues from the Hadleigh Road junction along the A1071 highlighted that the original proposal for WG1 to have a site access at the location of this junction would further exacerbate the capacity issues. That said, the next section looks at each junction model independently as these models have been incorporated into the VISSIM model.

9.3 Junction 1 Swan Hill / A1071 / B1113 “Beagle Roundabout”

- 9.3.1 The Swan Hill / A1071 / B1113 form a four arm priority controlled roundabout (referred to as the Beagle Runabout). An improvement scheme was agreed as part of the Wolsey Grange Phase 1 planning permission. The improvement includes carriageway widening on the A1071

Hurdle Makers Hill and B1113 approaches. The WSP WG1 proposed scheme is shown in the Insert below.



Insert 9.1: WSP WG1 Beagle Roundabout Improvement (now superseded)

9.3.2 These junction improvements were assessed as part of the Wolsey Grange Phase 1 and agreed as part of the planning permission. The geometric parameters from the Wolsey Grange Phase 1 submission have been used to set up a committed development model using Junctions 9 ARCADY module, the industry standard software for modelling priority controlled roundabouts.

9.3.3 The results of the assessment are summarised below, full modelling outputs are contained at **Appendix K**.

Arm	2036 + Committed Development			2036 + Committed Development + WGP2		
	RFC	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)
B1113	0.57	1	8	0.58	1	8
A1071 (WB)	0.92	10	35	0.99	20	64
Swan Hill	1.64	200	1149	1.74	232	1377
A1071 (EB)	0.81	4	22	0.83	5	25

9.2: ARCADY Results for Junction 1 Swan Hill / A1071 / B1113 “Beagle Roundabout” AM

Arm	2036 + Committed Development			2036 + Committed Development + WGP2		
	RFC	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)
B1113	0.53	1	7	0.58	1	8
A1071 (WB)	1.03	36	101	1.07	53	138
Swan Hill	1.05	22	149	1.07	25	168
A1071 (EB)	0.82	4	22	0.85	5	26

9.3: ARCADY Results for Junction 1 Swan Hill / A1071 / B1113 “Beagle Roundabout” PM

- 9.3.4 The results summarised above predict that the junctions will exceed theoretical capacity on the A1071 (WB) and Swan Hill approaches. Theoretical capacity is where an arm of a junction operates at or over a Ratio of Flow to Capacity (RFC) of 1.0.
- 9.3.5 When the trips associated with the proposed development are added to the committed development model the performance of the junction is further exacerbated. It is considered that mitigation is required. The model does not replicate the interaction between this junction the A1071/Hadleigh Road junction.
- 9.3.6 A scheme to convert the existing junction to a traffic signal controlled crossroad has been development as presented on **Drawing V891-PL-240-P01**. The proposed junction arrangement has been modelled using LinSIG, the industry standard software for modelling traffic signal controlled junctions. The results of the proposed junction performance are summarised below, full details are contained at **Appendix K**.

Arm	2036 + Committed + Development + Proposed Development					
	AM Peak			PM Peak		
	DoS	MMQ	PRC	DoS	MMQ	PRC
B1113	84.1%	8	+1.4%	75.7%	9	+19.0%
A1071 (WB)	88.3%	11		74.4%	12	
Swan Hill	88.7%	12		73.1%	7	
A1071 (EB)	67.8%	7		60.0%	7	
Cycle Time	76 Seconds			86 Seconds		

Table 9.4 – LinSIG Summary – Proposed Swan Hill Crossroads.

- 9.3.7 The results presented above show that the proposed junction layout would operate within operational capacity in the AM and PM peak periods. Operational capacity is where the Degree of Saturation (DoS) on all approaches is less than 90%. The junctions have been optimised to have a cycle time of less than 90 seconds, although it proposed that the junction should operate with MOVA.

9.4.3 The results from Table 10-6 of the approved Wolsey Grange Phase 1 Transport Assessment are replicated overleaf.

Arm	2025 + Wolsey Grange Phase 1			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1071 EB	64%	12	67%	12
Hadleigh Rd	74%	9	94%	18
A1071 WB	75%	16	94%	24
Site Access	52%	3	26%	1
Cycle Time	90 Seconds		90 Seconds	
Delay (pcu.hr)	15.9		26.6	
PRC (%)	+20.1%		-4.1%	

Table 9.5 – LinSIG Summary – WGP1 Committed Development Scheme

9.4.4 The results summarised above shows that the committed junction arrangement the AM peak would operate within operational capacity in the AM peak (maximum Degree of Saturation (DoS) of 75%). However the junction was predicted to exceed operational capacity in the PM peak (maximum DoS of 94%).

9.4.5 As discussed in previous sections of this report, as part of the WGP2 assessment a number of refinements to the Hadleigh Road / A1071 were identified which could increase the capacity of the junction to accommodate the trips associated with the WGP2 development. To avoid abortive works and network disruption a Non-Material Amendment (MNA) was submitted for the Wolsey Grange Phase 1 development to agree these works ahead of the delivery of the WGP2 development. These changes included:

- Removing the site access arm and returning the junction to a traffic signal controlled T-junction,
- To simplify the junction while providing additional capacity;
- To provide pedestrian/cycle crossings on the northern and eastern arms of the junction.

9.4.6 The refined junction has been modelled in LinSIG and the results are presented overleaf. Full LinSIG outputs are contained at **Appendix L**.

Arm	2036 Committed Development + Wolsey Grange Phase 2			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1071 EB	82.0%	10	86.8%	17
Hadleigh Rd	81.0%	8	87.6%	15
A1071 WB	76.3%	11	70.1%	13
Cycle Time	60 seconds		85 seconds	
Delay (pcu.hr)	17.2		22.1	
PRC (%)	+9.7%		+2.7%	

Table 9.6 – LinSIG Summary – Proposed A1071/Hadleigh Road Signalised Junction.

- 9.4.7 The results summarised above show that the refined scheme agreed as part of the Wolsey Grange Phase 1 NMA can accommodate 2036 future year forecast including the proposed development while operating within operation capacity. The practical reserve capacity (PRC) in the AM peak is predicted to be +9.7% and in the PM peak is predicted to be +2.7%.
- 9.4.8 The maximum queue predicted in the AM peak is 11 vehicles which is 6 vehicles (-31%) lower than the original Wolsey Grange Phase 1 accepted scheme. The maximum queue in the PM peak is 17 vehicles which is 7 vehicles lower (-29%).
- 9.4.9 In summary the improvement works being delivered by the Wolsey Grange Phase 1 development deliver sufficient capacity to accommodate growth to 2036 and the trip associated with the proposed WGP2 development. Therefore no additional capacity improvements are required.

9.5 Junction 3 - Poplar Lane / A1071

- 9.5.1 Poplar Lane forms the minor arm of an existing priority controlled T-junction with the A1071. Poplar Lane provides a southern access to the proposed Wolsey Grange Phase 1 committed development parcel. The Wolsey Grange Phase 1 development is committed to upgrade this junction to traffic signal control.
- 9.5.2 The results of the modelling accepted as part of the Wolsey Grange Phase 1 development have been taken from the supporting TA (Table 10-+5) and are summarised overleaf.

Arm	2025 + Wolsey Grange Phase 1 (Table 10-5)			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1071 EB	73%	13	101%	24
Poplar Lane	76%	5	55%	4
A1071 WB	84%	19	55%	18
Cycle Time	120 seconds		120 seconds	
Delay (pcu.hr)	49.1		119.6	

Table 9.7 – LinSIG Summary – WGP1 Proposed Junction (Taken from WSP TA)

- 9.5.3 The table above shows that whilst the junction is predicted to operate within operational capacity in the AM peak, it is predicted to operate at capacity in the PM peak where the DoS on the A1071 Eastbound movement is 101% with a resulting queue of 24 vehicles.
- 9.5.4 The layout approved at planning incorporates a dedicated left turn lane from the A1071 (WB) to Poplar Lane, however this arrangement restricted the ability to provide additional capacity at the junction in the future. As part of the WG2 assessment a number of refinements were identified. These involve simplifying the layout and pedestrian crossings to allow two ahead lanes for the A1071 westbound movement. In addition the method of control has been updated to run each approach in its own phase, allowing for better co-ordination with the A1214 / Scrivener Drive Junction.
- 9.5.5 An NMA was submitted to change the layout of the Poplar Lane / A1071 junction which has been accepted. This layout provides additional capacity for the WG2 development. The capacity results are summarised below, full output files are contained at **Appendix M**.

Arm	2036 + Committed Development + WGP2			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1071 EB	78.6%	14	75.7%	14
Poplar Lane	77.0%	9	71.9%	6
A1071 WB	67.2%	13	67.6%	13
Cycle Time	120 Seconds		120 Seconds	
Delay (pcu.hr)	28.2		27.4	
PRC (%)	+14.5%		+18.9%	

Table 9.8 – LinSIG Summary – Refined Development Proposal

- 9.5.6 The results summarised above show that the Poplar Lane / A1071 junction will operate well within capacity in both the AM and PM peak periods. The maximum RFC is predicted to be 78.6% in the AM peak with a resulting queue of 14 vehicles and 75.7% in the PM peak with a resulting queue of 14 vehicles. The junction operation is significantly better than those

accepted as part of the Wolsey Grange Phase 1 development and therefore no further improvements are required.

Junction 4 A1071 / A1214 / Scrivener Drive junction

9.5.7 Scrivener Drive and the A1071 form the minor arms of a staggered traffic signal controlled junction with the A1214. Junction improvements have been secured as part of the WG1 committed development which includes carriageway widening to allow two lanes of traffic to turn right from the A1071 (EB) to the A1214 (SB).

9.5.8 The results of the modelling accepted as part of the Wolsey Grange Phase 1 development have been taken from the supporting TA (Table 10-5) and are summarised below:

Arm	2025 + Wolsey Grange Phase 1 (Table 10-5)			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1214 (SB)	89%	11	101%	27
Scrivener Drive	92%	13	97%	14
A1214 (NB)	90%	18	97%	21
A1071 Left /Ahead	92%	20	102%	31
A1071 Ahead / Right	88%	12	92%	15
Cycle Time	120 seconds		120 seconds	
Delay (pcu.hr)	49.1		119.6	
PRC (%)	-2.3%		-13.1%	

Table 9.9 – LinSIG Summary – WGP1 Proposed Junction (Taken from WSP TA)

9.5.9 The table above shows that whilst the junction was predicted to operate at or over capacity in the AM and PM peaks. The PRC was calculated as -2.3% in the AM peak and -13.1% in the PM peak. These results were accepted as part of the WGP1 application.

9.5.10 The committed development layout has been modelled with 2036 + Committed Development and 2036 + Committed Development + WGP2 traffic flow forecasts as summarised overleaf.

Arm	2036 + Committed Development		2036 + Committed Development + WGP2	
	AM Peak		AM Peak	
	DoS	MMQ	DoS	MMQ
A1214 (SB)	103.0%	16	109.7%	25
Scrivener Drive	102.4%	30	109.6%	44
A1214 (NB)	99.0%	22	108.1%	38
A1071 Left / Ahead	103.6%	33	109.7%	44
A1071 Ahead / Right	100.9%	20	109.0%	33
Cycle Time	120 Seconds		120 seconds	
Delay (pcu.hr)	99.3		186.6	
PRC (%)	-15.1%		-22.0%	

Table 9.10 – LinSIG Summary – WGP1 Proposed Junction

Arm	2036 + Committed Development		2036 + Committed Development + WGP2	
	PM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1214 (SB)	96.9%	15	112.3%	34
Scrivener Drive	102.9%	21	112.2%	33
A1214 (NB)	100.8%	29	112.2%	66
A1071 Left / Ahead	102.8%	33	111.5%	49
A1071 Ahead / Right	101.0%	22	112.3%	38
Cycle Time	120 Seconds		120 seconds	
Delay (pcu.hr)	102.7		228.8	
PRC (%)	-14.3%		-24.1%	

Table 9.11 – LinSIG Summary – WGP1 Proposed Junction

- 9.5.11 The results summarised above show that with committed development and back growth applied to 2036 the junction would operate at over saturation with all but one arm operating at over 100% degree of saturation.
- 9.5.12 When the trips associated with the WGP2 development are added the performance of the junction is further impacted and therefore mitigation at this junction is required.
- 9.5.13 It is proposed to provide two ahead lanes from Scrivener Drive to A1071 westbound to provide better efficiency of the stop line. These works include realigning the central A1214 islands to enable large vehicles to track through the junction. It is also proposed to extend the left turn flare from the A1214 to A1071. The proposed improvements are shown on **Drawing V891/214**.

9.5.14 The committed development model has been updated to reflect the proposed changes and have been modelled with the 2036 + Committed Development + WGP2 traffic flow forecast. The results of the modelling are summarised below, full output files are contained at **Appendix M**.

Arm	2036 + Committed Development + WGP2			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1214 (SB)	95.9%	26	106.1%	50
Scrivener Drive	93.2%	14	99.8%	13
A1214 (NB)	94.2%	19	103.0%	32
A1071 Left	97.1%	22	103.9%	32
A1071 Ahead / Right	94.7%	18	102.3%	26
Cycle Time	120 Seconds		120 seconds	
Delay (pcu.hr)	75.6		144.4	
PRC (%)	-7.9%		-17.9%	

Table 9.12 – LinSIG Summary – WGP2 Proposed Junction

9.5.15 The results summarised above show that the junction would operate within capacity in the AM peak where all approaches are within a DoS of 100%. The total junction delay has been calculated as 75.6 which represents a 23.9% reduction in delay. This is considered to be a significant improvement in the AM Peak.

9.5.16 In the PM peak the total junction delay increases from 102.7 to 144.4 which represents a 32% and the overall PRC increases from -15.1% to -17.9%. The controller for the WGP1 committed development scheme has been set up by Green Traffic Signals, where they have proposed changes to the stages (increasing from 4 to 5 stages). The purpose of this is to allow flexibility and the ability for phases to be demanded. Where a demand is not placed the stage or individual phase is not called, which in itself is a significant improvement on the existing arrangement. However the LinSIG model results summarised above assume that all stages phases are called 100% of the time. This is considered to be an absolute worst case. With MOVA providing real time optimisation and observed pedestrian demand lower the junction will perform better.

9.5.17 To demonstrate this the phasing within each stage has been changed to omit the following:

- Pedestrian Phase J from Stage 1;
- Pedestrian Phase K from Stage 2;
- Pedestrian Phase I from stage 5

9.5.18 In this sensitivity test all pedestrian movements are still catered for within the cycle, however pedestrian phases have been curtailed in the phase ending stage to reduce the intergreen requirement (wasted green time). the impact of this subtle change is summarised below:

Arm	2036 + Committed Development + WGP2			
	AM Peak		PM Peak	
	DoS	MMQ	DoS	MMQ
A1214 (SB)	90.3%	12	100.5%	22
Scrivener Drive	93.2%	14	99.8%	13
A1214 (NB)	94.2%	19	103.0%	32
A1071 Left	94.5%	25	100.6%	27
A1071 Ahead / Right	90.9%	16	98.2%	21
Cycle Time	120 Seconds		120 seconds	
Delay (pcu.hr)	61.4		100.6	
PRC (%)	-5.8%		-14.4%	

Table 9.13 – LinSIG Summary – WGP2 Proposed Junction – Alternative MoC

9.5.19 When the results above are compared to the 2036 Committed Development scheme it shows that the overall delay in the AM peak reduces from 99.3 to 61.4 (a reduction of 38%) and in the PM from 102.7 to 100.6 (a reduction of 2%). This shows that the junction would operate significantly better in the AM peak and there would be a beneficial improvement in the PM peak.

9.5.20 Queuing at the junction is substantially reduced. In the AM peak total queuing on the 5 links reduces by 34 vehicles and in the PM peak by 5 vehicles. however as noted above with the flexibility of MOVA control it is expected that these results will be improvement upon.

Junction 7 Site Access Roundabout Junction with Hadleigh Road

9.5.21 The capacity at the site access roundabout has been reviewed. The model demonstrates the proposed roundabout has sufficient capacity with a maximum RFC of 0.76 in the AM peak and 0.57 in the PM on the Hadleigh Road northbound arm. The modelling output files are included in **Appendix N**.

2036 + Committed + Development						
Arm	AM Peak			PM Peak		
	RFC	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)
Hadleigh Rd (SB)	0.51	1.0	6.42	0.59	1.40	7.78
Site Access East	0.08	0.1	4.56	0.05	0.1	4.60
Hadleigh Rd (NB)	0.76	3.1	11.09	0.57	1.3	6.16
Site Access West	0.03	0.0	7.19	0.01	0.0	5.53

Table 9.14: ARCADY Results for Junction 7 Site Access Roundabout Junction with Hadleigh Road.

Junction 8 Site Access Priority T junction with Hadleigh Road (Northern side)

9.5.22 The capacity of the proposed site access from Hadleigh Road to serve the northern parcel of development has been reviewed using PICADY. The results show that the junction has suitable capacity to serve the development with a maximum RFC of 0.36 in the AM peak and 0.17 in the PM peak. The modelling output files are included in **Appendix O**.

Arm	2036 + Committed + Development			
	AM Peak		PM Peak	
	RFC	Queue (PCU)	RFC	Queue (PCU)
Hadleigh Rd (SB)	0.04	0.0	0.17	0.2
Site Access North of HR	0.36	0.6	0.07	0.1
Hadleigh Rd (NB)	-	-	-	-

Table 9. 15: PICADY Results for Junction 8 Site Access Priority T junction with Hadleigh Road (Northern side)

Junction 9 Site Access Priority T junction with Hadleigh Road (Southern side)

9.5.23 The capacity of the proposed site access from Hadleigh Road to serve the southern parcel of development has been reviewed using PICADY. The results show that the junction has suitable capacity to serve the development with a maximum RFC of 0.33 in the AM peak and 0.20 in the PM peak. The modelling output files are included in **Appendix P**.

Arm	2036 + Committed + Development			
	AM Peak		PM Peak	
	RFC	Queue (PCU)	RFC	Queue (PCU)
Hadleigh Rd (SB)	-	-	-	-
Site Access South of HR	0.33	0.5	0.20	0.30
Hadleigh Rd (NB)	0.05	0.1	0.15	0.20

Table 9.16: PICADY Results for Junction 9 Site Access Priority T junction with Hadleigh Road (Southern side)

10.0 ACCESS AND MOVEMENT STRATEGY

10.1 Introduction

10.1.1 The existing transport networks and the opportunities for sustainable travel by non-car modes are described in Section 2. This section of the TA details the proposed transport access strategy for non-car modes at the development which is consistent with local and national transport policy aims and objectives. An audit of such local facilities has been undertaken and an accessibility plan produced. This is shown on **Figure 1**. The plan contained in **Appendix A** shows the walking routes to the new local primary school from within the site. **Figure 4** provides a plan of the development land parcels labelled A-E for ease of reference.

10.2 Walking & Cycling Strategy

10.2.1 The internal site layout has been designed to accommodate pedestrian desire lines through and within the site. Development of the site provides an opportunity to create enhanced connection between Sproughton Village, Hadleigh Road and London Road (A1214).

10.2.2 **Figure 1** shows how the pedestrian desire lines have been catered for. The existing PROWs that run through the site have been maintained and incorporated into the masterplan without change to their existing alignment. Whilst alternative surfaced routes within the development will cater for the majority of movements the PROWs offer a more informal ability to move around the development and will likely be used for recreation, such as dog walking.

10.2.3 There is a north-south pedestrian desire line. The site is bisected by Hadleigh Road. Two pedestrian crossings are proposed on Hadleigh Road. The first of these is proposed in the vicinity of the site access for Parcel A. There is a Tiger crossing which will cater for both pedestrian and cyclists. This will allow pedestrians and cyclists to cross from Parcel A to Parcel D. A shared footway/cycleway is proposed on the southern side of Hadleigh Road between the new roundabout site access junction for Parcel C and D and the T junction for Parcel A. The pedestrian/cycleway will continue into Parcel A and connect to the A14 underpass to the north of the site. The footway/cycleway will also continue into Parcel D to the proposed Primary School.

10.2.4 Pedestrian and cyclists will also be accommodated at the improved Hadleigh Road/A1071 junction. A TOUCAN crossing is included within the junction design. This will cater for pedestrians and cyclists travelling between WG1 and WG2 and in particular, those residents from WG1 walking and cycling to the Primary School located within WG2.

10.2.5 A footway is currently provided over the bridge over A14 to provide a connection to the bus stops in the vicinity of the Beagle junction, though it is informal in nature and not fully made up. The proposed junction improvements at the Beagle junction will include a pedestrian crossing to allow safe crossing between the existing bus stops on the northern and southern side of the A1071.

10.2.6 Within the site, the footway and cycleway connection run north to south and east to west. These will form 3m shared footway/cycleway. Whilst there has been a recent move away

from the provision of shared use pedestrian and cycle facilities following the publication of LTN 1/20, CCE considered they are still appropriate within the residential setting where vehicle, pedestrian and cycle numbers will be low. LTN 1/20 paragraph 7.5.1 states the following regarding this: *“The design of new residential access streets and redesign of existing streets can create very low speed environments which enable cycling without the need for specific measures (see Figure 7.7). Such streets are mainly used by local residents, their visitors and deliveries and servicing traffic. There is therefore no need to provide geometry that accommodates higher vehicle speed”* and at paragraph 14.3.25: *“Most residential streets in new developments, including smaller schemes, will be suitable for cycling in mixed traffic as the speed and volume of motor traffic will be low.”*

- 10.2.7 The use of shared footway/cycleways within the development has been agreed in principle with SCC as Highway Authority. Where shared footway/cycleways are adjacent to the carriageway within the site, they will be complimented by a 2m footway on the opposite side of the carriageway. This provides pedestrians with a choice.
- 10.2.8 The site is undulating in nature. Providing a pedestrian and cycle connection from Parcels B and E to Parcel D requires crossing the valley within the site and the drainage basin associated with the WG1 development. A “cross valley link” will provide the most direct link between the parcels and be DDA compliant. This will be wider at 4m as it will be a key link to the school and will cater for pedestrians and cyclists. Details of the cross valley link are shown on **CCE Drawing V891-PL-SK-208**.
- 10.2.9 The provision of a dedicated and linked pedestrian and cycle route through the site will reduce the walking/cycling distance from the A14 underpass to the A1214 by around 0.5km for cyclists and provide a predominately traffic free route with appropriate crossing facilities at the Hadleigh Road and within the development.
- 10.2.10 In terms of improvements off site, there is an existing footway on the northern side Hadleigh Road from the eastern boundary of the site all the way to the junction with the A1214 near Sainsbury’s supermarket. There are some improvements that can be made to this footway as listed below.
- A. Scrape back vegetation to maximise full width of the footway where appropriate.
 - B. Provide an uncontrolled dropped kerb crossing in the vicinity of the access to Chantry Park
 - C. Uncontrolled crossing point with dropped kerbs and tactile paving at side road junctions (Stella Maris, Elton Park Business Centre, Dunlop Road)
- 10.2.11 A footway/cycleway connection will be provided from the site to London Road. This will tie into the exiting provision along London Road which already includes good provision for pedestrian and cyclists.
- 10.2.12 The proposals have suggested the inclusion of include a direct pedestrian link into Chantry Park which is located immediately east of the site.

10.2.13 There is an existing underpass under the A14 which provides a connection to the village of Stoughton on the north-western side of the A14. The development of the site will provide an attractive onward route to key destinations to the south of the site including Suffolk One Sixth Form College. Therefore it is considered that improvements to the existing underpass could be made to make this a more attractive route for walking and cycling. We are aware that SCC are currently looking at improvements to the underpass.

10.2.14 There is a new employment area under development at the former Sugar Beat factory to the north of the site and north of the River Gipping. This location is shown on **Figure 1** and on the Parameter Plans in **Appendix A**. The local planning authority have a desire to provide a pedestrian/cycle bridge across the River Gipping to link the employment area with the residential area surrounding Hadleigh Road and this is included in the emerging Local Plan Infrastructure Development Plan. Taylor Wimpey are happy to facilitate a bridge connection on land within their control.

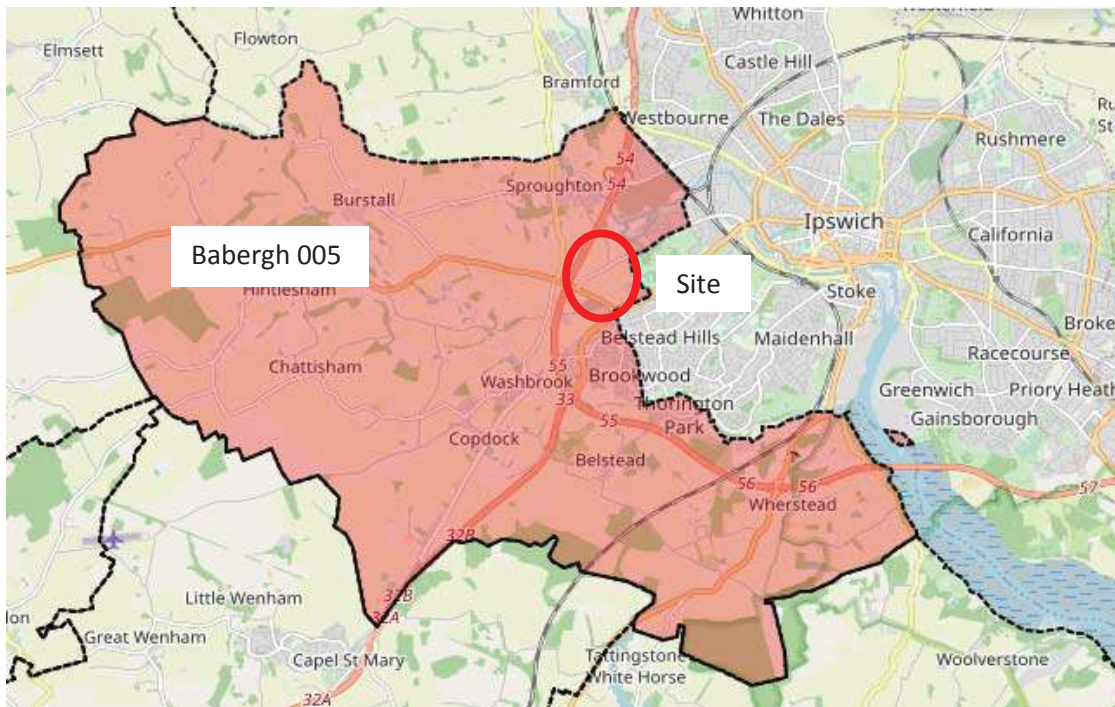
10.3 Public Transport

10.3.1 A number of public transport improvements are proposed in the form of new bus stops. These are to be located as follows:-

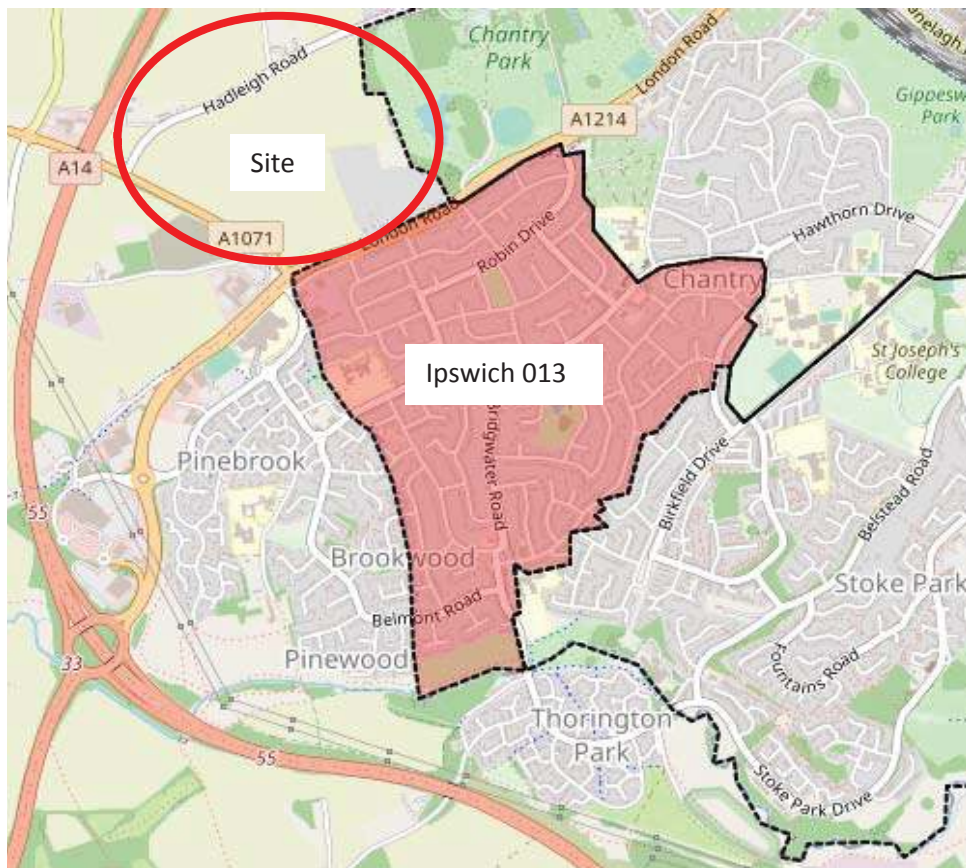
- 2 x bus stops on Hadleigh Road in the vicinity of the access to Parcel A.
- 2 x bus stop on the A1071 in the vicinity of the improved Hadleigh Road/A1071 junctions.
- Improved pedestrian connectivity to the bus stop in the vicinity of the Beagle junction.

10.4 Existing Mode Share

10.4.1 To determine the existing mode split of local residents and estimate how people travel in the area, the 2011 Census data has been interrogated. The data reviewed included Super Output Area (SOA) Babergh 005 and SOA Ipswich 013. These areas are shown in the inserts overleaf.



Insert 10.1: Super Output Area Babergh 005 (Source <https://www.nomisweb.co.uk/>)



Insert 10.2: Super Output Area Ipswich 013 (Source <https://www.nomisweb.co.uk/>)

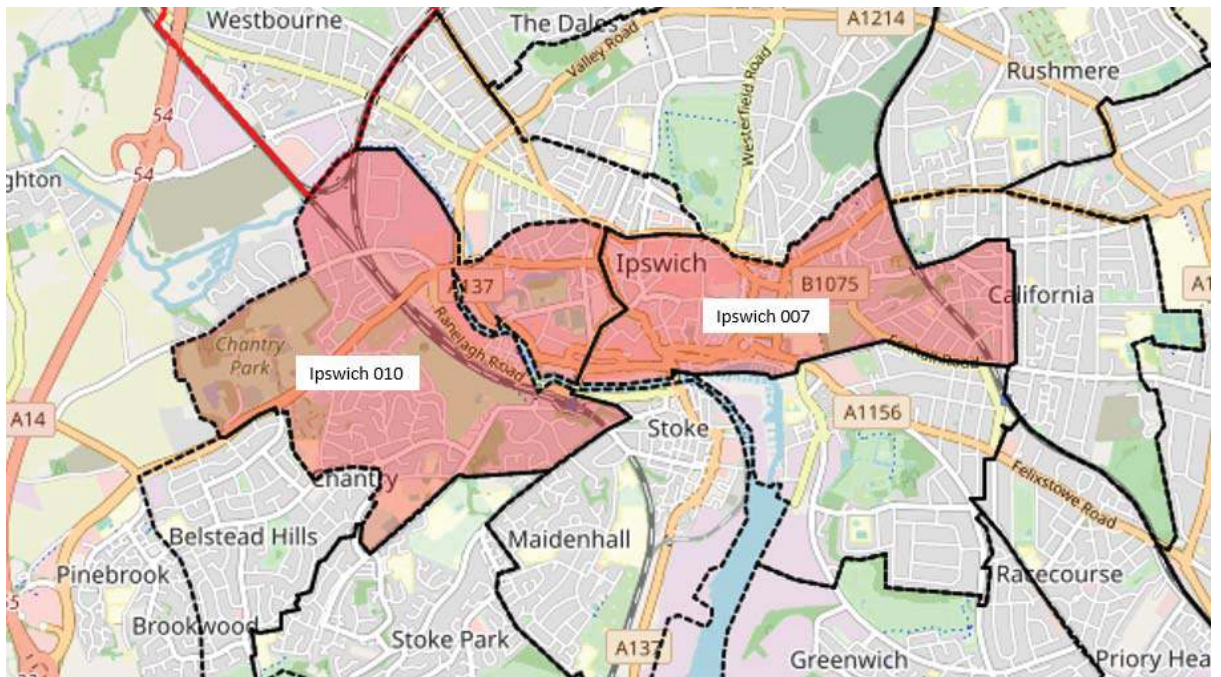
10.4.2 SOA Babergh 005 covers a wide area mostly to the west of the A14 and is predominantly rural in nature. SOA Ipswich 13 covers the Sprites Ward of Ipswich, being located on the fringe of Ipswich. It is considered that Ipswich 013 is more representative of the site location. It is a residential area on the southern side of the A1214 located in similar proximity to Ipswich town centre.

Method of Transport	Babergh 005		Ipswich 013	
	All Destinations	Ipswich Destinations Only	All Destinations	Ipswich Destinations Only
Train	4%	0%	1%	0%
Bus, Minibus or Coach	6%	11%	13%	17%
Taxi	0%	0%	0%	0%
Motorcycle, Scooter or Moped	1%	1%	2%	2%
Driving a car or van	76%	71%	61%	53%
Passenger in a car or van	5%	7%	8%	8%
Bicycle	2%	4%	4%	5%
On Foot	5%	5%	12%	14%
Other Method of Travel to Work	1%	1%	0%	1%

Table 10.1: Summary of 2011 Census Data for Travel to Work

10.4.3 The 2011 Census Data shows that the sustainable mode share for journeys into Ipswich from SOA Ipswich 013 is good with 17% undertaken by bus, 14% on foot, 8% as car passenger and 5% by bicycle.

10.4.4 Looking at 2011 Census data in more detail 30% of residents work in Ipswich town centre in SOA Ipswich 007 and Ipswich 010.



Insert 10.3: Super Output Area Ipswich 007 and 010 (Source <https://www.nomisweb.co.uk/>)

Method of Transport	Ipswich 013	
	To Ipswich 007	To Ipswich 010
Train	0%	0%
Bus, Minibus or Coach	13%	35%
Taxi	0%	1%
Motorcycle, Scooter or Moped	3%	2%
Driving a car or van	54%	36%
Passenger in a car or van	6%	10%
Bicycle	6%	5%
On Foot	18%	11%
Other Method of Travel to Work	0%	0%

Table 10.2: Summary of 2011 Census Data for Travel to Work into central Ipswich

10.4.5 The mode share data for travel to destinations within central Ipswich shows that to Ipswich 010 35% of people travelling to this area for work from the Sprites Ward do so by bus. This is comparable to the number of people who travel by car at 36%.

10.4.6 The number of people walking to workplace destinations within Ipswich 007 is high at 18%. 13% also travel by bus. Car share is high to both destinations. The cycle mode share is at 6%/5%. It is considered that there is scope to increase this. The local cycle infrastructure has

much improved over the last 10 years since the 2011 Census. The site will open up new cycle corridors for existing and future residents.

- 10.4.7 It is expected that, given the site's location adjacent a main public transport corridor, that such services could be positively promoted to future residents, visitors and employees. Walking and cycling are also practical travel options where the site is located adjacent to a main traffic free cycleway to Ipswich town centre, and could be positively encouraged with the development of the site Travel Plan.

10.5 Travel Plan

- 10.5.1 A Residential Travel Plan has been prepared as a standalone document. The document reflects more recent discussions between TW and SCC related to the WG1 development and the implementation the Travel Plan prepared for that development.
- 10.5.2 The Residential Travel Plan seeks to provide a number of measures to reduce vehicular trips from the development on the local highway networks, and furthermore make full use of the excellent linkages to the town centre facilities by walk and cycle modes from WG2.
- 10.5.3 The review mechanism within the WG1 Travel Plan will be referred to inform subsequent phases of development, including WG2. If successful in achieving more sustainable travel the impacts will be expected to reduce in terms of traffic and single occupancy vehicle use and this will provide objective evidence of what measures are successful and allow refinement as the development proceeds. We consider that this approach is fundamental to achieving the Policy aspirations both nationally and locally and is a strength of the phased approach to development.
- 10.5.4 The Travel Plan will therefore be a live document supported with updates from surveys associated with the WG1 Travel Plan which will be beneficial in its development and implementation.

11.0 CONSTRUCTION MANAGEMENT

11.1 Introduction

- 11.1.1 During the construction of the proposed development it will be necessary for various plant, equipment and material to be transported to the site.
- 11.1.2 A construction impact assessment has been provided to inform the assessment of effects in the EIA and specifically considers the volume, impact and routing of construction traffic on the local and strategic road network. The principles of a Construction Traffic Management Plan (CTMP) are set out within this section and it is normal that the details of the CTMP will form a condition of the planning application. A similar approach was taken for WG1.
- 11.1.3 Due to the expected long period build out of Wolsey Grange 2 development, the CTMP is intended as an evolving document and as construction of the various phases of the development become live, production of bespoke CTMP's for phases and/or phase parcels may be appropriate. Again, a phasing plan is likely to be a condition of the planning permission.
- 11.1.4 The proposals include a number of off-site highway improvements. The intention of the CTMP will be to program works to be undertaken as efficiently as possible and minimise disruption to the local highway network. Part of this has been accomplished already by ensuring that the works being completed by WG1 encompass likely changes that would have been required by WG2. Whilst this did not change the material nature of the WG1 highway works though it has simplified at least one junction, it does mean that roadworks carried out do not need to be enlarged upon later to accommodate potential future development.

11.2 Construction Development Phasing

- 11.2.1 The proposed development phasing is not fully known at this stage but the program below highlights the anticipated build out rate:
- Construction Phase Start – 2026
 - Build Out Rate (Market and Affordable) – 75 dwellings per annum
 - Construction Phase Period – 10 years
 - Construction Phase End / Site Fully Operational – 2036
- 11.2.2 The development of the Primary School proposals will be for SCC to determine but is expected to be in an early phase of development as it is required to support the WG1 development.

11.3 Construction Traffic Volumes

- 11.3.1 The number of HGV and construction worker traffic movements associated with the construction of Wolsey Grange is based both on the composition of the proposed development and experience of similar sites elsewhere. However, it should be noted that the

actual number of trips associated with construction can vary by method of construction; therefore the figures provided in this report are for indicative purposes only.

- 11.3.2 Based on information from Taylor Wimpey who are currently building out WG1 Table 11.1 below provides a summary of the potential daily traffic movements associated with the development construction.

Development	Daily Workforce Movements	Daily HGV Movements
Rate of construction 75 units/year	40 - 50	Average 4 a day, max 30 a day (during earthwork phase)

Table 11.1 Development Construction Schedule

- 11.3.3 HGV traffic and construction workers generally travel outside the peak periods. Construction sites are typically operational before the AM peak period and cease operation before the PM peak period.

11.4 Assignment, distribution and Routing

- 11.4.1 It is expected that the development related construction traffic will route along the main network corridors, namely the A1214 and A1071. HGVs drivers will be encouraged to remain on these roads to serve the development, reducing the impact on local residential neighbourhoods.

11.5 Construction Traffic Impact

- 11.5.1 It is estimated that the construction traffic will mostly be traffic outside main traffic peak periods. The level or anticipated traffic remaining within the peak periods should be less than the proposed development traffic.
- 11.5.2 It can therefore be concluded that the development traffic would not have discernible impact on the local highway network.

11.6 Signage

- 11.6.1 Construction Traffic Route (CTR) will be proposed to be followed to and from the site by construction traffic vehicles. This will be appropriately signed.

11.7 Parking associated with Site Construction

- 11.7.1 All parking associated with the construction of the development will be accommodated on site.

11.8 Monitoring

- 11.8.1 A programme of monitoring and review will be implemented to generate information by which the success of the Construction Traffic Management Plan can be evaluated. Monitoring

and review of construction activity to the site will be the responsibility of the principal contractor.

- 11.8.2 The process will provide the opportunity for construction operations and procedures on the site to be reviewed and new management measures to be implemented (if necessary). Monitoring will be documented and available to the Local Authority upon request

12.0 SUMMARY & CONCLUSIONS

12.1 Summary

- 12.1.1 This Transport Assessment (TA) has been prepared by Cannon Consulting Engineers (CCE) on behalf of Taylor Wimpey Strategic Land to provide highway and transportation advice in relation to proposals for a residential development on Land North of the A1071, Ipswich, Suffolk.
- 12.1.2 The development is for outline planning permission (with all matters reserved except for access) for up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements.”
- 12.1.3 As an allocated site within the emerging Local Plan, it has already been accepted that Wolsey Grange 2 offers a means to provide new housing in Ipswich as a sustainable urban extension. It builds on the success of Wolsey Grange Phase 1 (WG1) on the opposite side of the A1071.
- 12.1.4 A number of key parameters agreed with Suffolk County Council as Highway Authority for WG1 have been applied to this application for WG2. This includes trip rates, the scope of the junction impact assessment and traffic distribution. Revisiting these aspects in detail was therefore unnecessary as part of this Assessment.
- 12.1.5 The existing transport conditions have been considered. These include all transport modes from non-motorised users (pedestrian and cyclists) to public transport and the road network. It is considered that the site is well located in relation to the existing transport network. There is a well-established and well connected walking and cycling network that can be enhanced with pedestrian and cycle provision provided throughout the site. The local bus routes provide frequent services to key destinations and additional bus stops are proposed on Hadleigh Road and the A1071 to maximise public transport accessibility from the site. There are a number of local facilities including schools and shops within easy access all of which will reduce the distance to travel from the development and make access by modes of travel other than the car possible.
- 12.1.6 A review of the 2011 census data for travel to work demonstrates that there is high containment with 64% of residents who live in the local area working within Ipswich. This is unsurprising. Further detail within the census for travel to work shows a reasonably high propensity to walk and use public transport within the town. The emerging Local Plan endorses an approach to future travel that will focus on demand management and encouraging the use of sustainable modes of travel. The location of the development is well placed to enable this to happen and a Travel Plan will be a requirement that can assist such changes in behaviour.
- 12.1.7 Vehicular access into the site will be from three separate locations on Hadleigh Road. This will include one roundabout junction and two priority T junctions. The access strategy caters for all modes of transport.

- 12.1.8 As part of the application process for WG2, very detailed consideration has been given to how the off-site works associated with WG1 could be adapted to incorporate the necessary off-site works associated with WG2 to minimise disruption to the local road network.
- 12.1.9 The approach taken has built on the knowledge and assessment of the previous WG1 proposals and a detailed review of the A1071 corridor that would be the focal point for access to the development site and traffic movements associated with the development.
- 12.1.10 This included detailed origin and destinations surveys, journey time surveys and on site observations to understand the cause of the congestions experienced on the A1071 in 2019. As a result of this it was clear that a corridor approach was required to alleviate the A1071 of existing congestion and accommodate future growth in the area. As a result a number of off-site highway improvements for the WG2 proposals have been incorporated in the WG1 off-site highways mitigation and access works.
- 12.1.11 The network capacity modelling of the works secured as part of the Wolsey Grange Phase 1 and additional works as part of Wolsey Grange Phase 2 will provide a substantial reduction in journey times within the network. In particular the journey time from A1071 Hurdle Makers Hill (EB) to A1214 (NB) is predicted to reduce by 71% when compared to the 2019 observed base values.

12.2 Conclusion

- 12.2.1 It is considered that the development will have an acceptable impact on, and relationship to, existing transport infrastructure and that suitable additional infrastructure can be provided in line with the scale and impact of the proposals and in accordance with adopted sustainable Policy requirements.
- 12.2.2 It is concluded that the residual cumulative impacts in relation to highways capacity and safety would not be severe and the development therefore meets the Policy requirements set out in the NPPF.



Suffolk County Council (20041323)

Answers to Examining Authority's First
Written Questions (ExQ1)

Bramford to Twinstead (EN020002)

Deadline 3

31 October 2023

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Glossary of Acronyms

DCO	<i>Development Consent Order</i>
ExA	<i>Examining Authority</i>
ExQ	<i>Examining Authority's Written Questions</i>
LHA	<i>Local Highway Authority</i>
LLFA	<i>Lead Local Flood Authority</i>
LPA	<i>Local Planning Authority</i>
NGET	<i>National Grid Electricity Transmission</i>
PROW	<i>Public Rights of Way</i>
SCCAS	<i>Suffolk County Council Archaeological Service</i>
SCC	<i>Suffolk County Council</i>

"The Host Authorities" refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.

Purpose of this Submission

This document has been prepared by Suffolk County Council in response to the Examining Authority's First Written Questions (ExQ1) and is based on a template provided by the Planning Inspectorate case team. For ease of use, questions which are not addressed to Suffolk County Council have been greyed out and where another authority is the Lead Authority, this has been attributed. Examination Library references have been used throughout to assist readers.

1 Answers to Examining Authority's First Written Questions (ExQ1)

Reference	Question to:	Question	Local Authority Answer
0. Miscellaneous and general			
General and cross-topic			
MG1.0.1	The Applicant		
MG1.0.2	The Applicant		
MG1.0.3	The Applicant		
MG1.0.4	The Applicant		
MG1.0.5	East of England Ambulance Services Trust		
MG1.0.6	Essex Police		
Legislation and policy			
MG1.0.7	Local planning authorities	<p>The Planning Statement [APP-160] refers, for example in the Executive Summary, to the draft replacement NPS EN-1 and NPS EN-5 that were the subject of consultation in 2021. Having noted what the Applicant said on the matter in its cover letter [APP-001] should its Planning Statement be updated to reflect the versions issued for consultation in March 2023, given that the application was made after this?</p>	<p>SCC (Planning) believes that relevant draft policy is a relevant and important consideration and therefore the most recent draft should be taken into consideration. SCC is neutral on the question of whether this would be most effectively done by updating the Planning Statement or by the submission by the Applicant of a free-standing document addressing compliance with the draft NPSs.</p>

Reference	Question to:	Question	Local Authority Answer
MG1.0.8	The Applicant Local planning authorities	In the Applicant’s cover letter [APP-001], reference is made to the Government document <i>Powering Up Britain</i> , published by the Department for Energy Security and Net Zero, March 2023, explaining the reason for not referencing it. What weight should be given to this publication?	SCC (Planning) has included reference to this document in its Local Impact Report [REP1-045] as it considered to be a high-level expression of Government policy and therefore is a relevant and important consideration. The degree of weight it should be given is unlikely to be uniform across the document as a whole but is likely to be influenced by the specific contents and their relevance to the issues arising in the Application to which they relate. However, SCC would draw specific attention to the over-arching statement on page 9 (attributed to the Prime Minister) that “there can be no solution to climate change without protecting and restoring nature” and SCC would suggest that this is an important factor when considering the Applicant’s arguments that its need case justifies particular harms to the local environment.
MG1.0.9	The Applicant Local planning authorities	Neither the Planning Statement [APP-060] nor Chapter 2 of the ES [APP-070] appear to refer to <i>A Green Future: Our 25 Year Plan to Improve the Environment</i> published by the Department for the Environment, Food and Rural Affairs in 2018. The Suffolk councils cite this in their LIR [REP1-045]. What weight should the Applicant give to this publication?	SCC (Planning) has included reference to this document in its Local Impact Report [REP1-045] as it considered to be a high-level expression of Government policy and therefore is a relevant and important consideration. The degree of weight it should be given is unlikely to be uniform across the document as a whole but is likely to be influenced by the specific contents and their relevance to the issues arising in the Application to which they relate.
MG1.0.10	The Applicant Local planning authorities	Neither the Planning Statement [APP-060] nor Chapter 2 of the ES [APP-070] appear to refer to <i>The UK’s Industrial Strategy</i> , included in the Suffolk councils’ LIR [REP1-045], that gave rise to the associated <i>Build Back Better: our plan for growth</i> that was published by HM Treasury in March 2021. Should the Applicant take account of it?	SCC (Planning) has included reference to this document in its Local Impact Report [REP1-045] as it considered to be a high-level expression of Government policy and therefore is a relevant and important consideration.
MG1.0.11	The Applicant		

Reference	Question to:	Question	Local Authority Answer
MG1.0.12	The Applicant Local planning authorities	The Suffolk councils' LIR [REP1-045] refers to the Government's <i>Community Benefits for Electricity Transmission Network Infrastructure</i> , published in March 2003. Should the Applicant take account of it?	SCC (Planning) has included reference to this document in its Local Impact Report [REP1-045] as it considered to be a high-level expression of Government policy and therefore is a relevant and important consideration.
MG1.0.13	The Applicant Local planning authorities	The Suffolk councils' LIR [REP1-045] refers to the National Planning Policy Framework, September 2023. Given that its publication superseded submission of this application, what weight should the Applicant attach to it?	SCC (Planning) believes that relevant National Planning Policy Framework is the most recent version dated September 2023. SCC is not aware of any guidance to suggest that the weight that should be given to current Government policy should be reduced because it was published after the date that the application was submitted. It is incumbent on the Applicant to address all current policy guidance that is relevant and important (unless the guidance itself expressly includes transitional provisions to limit its application to pre-existing projects that have not yet been determined). Paragraph 218 of Annex A of the NPPF makes it a material consideration from the date of its publication and para 5 explains its relevance to NSIPs.
MG1.0.14	Local planning authorities	Are the host local planning authorities content with the assessment and conclusions of the Applicant's analysis of the local planning policy context set out in Section 8 and Appendices D and E of the Planning Statement [APP-160] (noting it was written with a 'data-freeze date' of 31 January 2023), Chapter 2 of the ES [APP-070] and ES Appendix 2.2 [APP-089]?	SCC (Planning) believes that the most up to date Policy Documents should be referred to at the time the Application is made. However, where there is a change to those Policy Documents post-submission, the Applicant should expect to provide an update to its earlier assessments. SCC is aware that the BMSDC Joint Local Plan Part 1 is expected to be adopted as part of the Development Plan in November 2023 and that it will thereupon supersede some earlier elements of the Development Plan and it would be reasonable to expect the Applicant to provide an updated assessment of any relevant policy changes.
MG1.0.15	Local planning authorities	Acknowledging the helpful local policy coverage set out in the LIRs [REP1-039] and [REP1-045], are the host local planning authorities content with the assessment and conclusions of the Applicant's analysis of committed developments overlapping with the proposed Order Limits for the Proposed	SCC (Planning) as Minerals & Waste Planning Authority is content that the analysis as submitted is accurate. SCC (Planning) defers to BMSDC in respect of non-County matter development.

Reference	Question to:	Question	Local Authority Answer
		Development, as set out in Appendix C of the Planning Statement [APP-160]?	
MG1.0.16	The Applicant Mid Suffolk DC Babergh DC		
The Proposed Development			
MG1.0.17	The Applicant		
MG1.0.18	The Applicant Natural England RSPB Local planning authorities	ES chapter 4 [APP-072] (paragraph 4.6.6) includes an illustration (4.2) that shows how trees would be cut back where the 400kV line passes through woodland. On either side of the 20m swathe there is a 12.5m band of 'graduated cutting back'. Is this appropriate? It could, for example, lead to tall tree stumps that look unnatural and may not regrow. Might coppicing and regrowth management be more appropriate to achieve a more natural and biodiverse woodland edge ecocline?	SCC (Ecology) defers to Essex Place Services as instructed by BMSDC, Natural England and RSPB.
MG1.0.19	The Applicant		
MG1.0.20	The Applicant		
MG1.0.21	The Applicant		
MG1.0.22	The Applicant		
MG1.0.23	The Applicant		
MG1.0.24	The Applicant		

Reference	Question to:	Question	Local Authority Answer
Alternatives			
MG1.0.25	The Applicant		
MG1.0.26	The Applicant		
MG1.0.27	The Applicant		
MG1.0.28	The Applicant		
MG1.0.29	The Applicant		
MG1.0.30	The Applicant		
MG1.0.31	The Applicant		
MG1.0.32	The Applicant		
MG1.0.33	John Duncan Irvine Bennett		
The Funding Statement			
MG1.0.34	The Applicant		
MG1.0.35	The Applicant		
MG1.0.36	The Applicant		
MG1.0.37	The Applicant		
MG1.0.38	The Applicant		
MG1.0.39	The Applicant		
MG1.0.40	The Applicant		
MG1.0.41	The Applicant		
MG1.0.42	The Applicant		

Reference	Question to:	Question	Local Authority Answer
Socio-economics and other community matters: general			
MG1.0.43	Local planning authorities	Do you consider that the methodology used in the analysis of socio-economic impacts in Section 3 of the Socio-Economics and Tourism Report [APP-066] is appropriate and that the analysis has been carried out correctly in the context of this methodology?	<p>SCC (Skills / Economic Development) notes that the document states “The effect of construction workers on accommodation is considered at a district/county level, as the workers are likely to seek accommodation over a wider area to benefit from wider market availability (for example, the large settlement of Ipswich) and proximity to the wider transport network, including the A12 and A14.” This is appropriate.</p> <p>It is agreed that 2020 and 2021 were atypical due to the Pandemic disruption. It might be worth using 2019 as a baseline year, as the tourism economy has yet to return to pre-pandemic levels.</p> <p>There is an absence of reference to several key documents and data sources, as discussed within section 15 of the Local Impact Report [REP1-045]. Therefore, SCC does not have confidence in the accuracy of the analysis.</p>
MG1.0.44	Local planning authorities	Do you agree with the conclusions drawn from the socio-economic analysis in the Socio-Economics and Tourism Report [APP-066]? Are there particular points at issue?	<p>SCC (Skills / Economic Development) are concerned about the socio-economic effects as listed in Table 6.1 and the direct effects on the tourism/visitor economy. We do not agree that there will be “no likely significant effects”. We are concerned about the long-term effects on a balanced thriving visitor economy once work is complete and do not agree that this should be scoped out.</p> <p>SCC does not agree with the conclusions drawn from the analysis due to a lack of data provided, such as workforce numbers (as discussed in section 15 of the LIR [REP1-045]. The Applicant has not thoroughly considered implications of other energy infrastructure projects and cumulative impact.</p>
Socio-economics and other community matters: farming			
MG1.0.45	The Applicant		
MG1.0.46	The Applicant		
MG1.0.47	The Applicant		
MG1.0.48	The Applicant		

Reference	Question to:	Question	Local Authority Answer
MG1.0.49	The Applicant		
MG1.0.50	The Applicant		
MG1.0.51	The Applicant		
MG1.0.52	The Applicant		
MG1.0.53	The Applicant		
MG1.0.54	Local planning authorities	Do you consider that impacts on agriculture businesses have been properly considered and assessed?	In principle, SCC (Planning) considers that the proposals and their implementation which would include restoration of disturbed land and landowner agreements would be sufficient to safeguard agricultural interests.
Socio-economics and other community matters: tourism and local recreational users			
MG1.0.55	The Applicant		
MG1.0.56	Local planning authorities	<p>Paragraph 5.2.7 (Effects During Construction) of the Socio-Economics and Tourism report [APP-066] states, <i>'With these [good practice] measures in place, it is unlikely that the project would result in significant effects on the tourism economy during construction'</i>.</p> <p>Do you consider that the impacts on tourism been properly assessed, particularly with regard to Dedham Vale and the Stour Valley, footpaths, cycleways, bridleways, and other leisure areas? Do you consider that the proposed good practice and mitigation measures would address the potential impacts? If not, what additional measures do you consider are required?</p>	<p>SCC (Planning) is concerned about the impacts of in particular the proposed working hours upon amenity and tourism. Details of phasing would, it is believed, mitigate this. NGET say that details of the construction programme will not be available until contractors are appointed. For this reason, it is SCC's position that management plans including the CTMP and CEMP require further detail which could be discharged via a Requirement under the DCO.</p> <p>SCC (Skills / Economic Development) are concerned about the socio-economic impact of this project as well as the effects on tourism. These effects will be economic, visual, environmental and physical. We do not feel that they have been sufficiently considered as part of this assessment and require closer examination.</p>

Reference	Question to:	Question	Local Authority Answer
Socio-economics and other community matters: employment			
MG1.0.57	The Applicant		
MG1.0.58	The Applicant		
Socio-economics and other community matters: businesses			
MG1.0.59	The Applicant		
MG1.0.60	Local planning authorities	Do you consider that the impact of the Proposed Development on businesses has been properly considered and assessed, particularly in relation to the potential for disruption caused by the construction and dismantling process?	<p>SCC (Planning) is concerned about the impacts of in particular the proposed working hours upon amenity and tourism. Details of phasing would it is believed mitigate this. NGET say that details of the construction programme will not be available until contractors are appointed. For this reason, it is SCC's position that management plans including the CTMP and CEMP require further detail which could be discharged via a Requirement under the DCO.</p> <p>SCC (Skills / Economic Development) are concerned of the effects on tourism as part of this process. We are also concerned that insufficient consideration has been given to the effects on the local labour market/workforce and how the demand for this work (along with the other NSIPs proposed for Suffolk over the next few years) can be met.</p>
Socio-economics and other community matters: local residents and community			
MG1.0.61	The Applicant		
MG1.0.62	Local highway authorities	Could you provide accurate, up-to-date and publicly accessible information on your websites relating to any walking, cycling and horse rider diversion routes that were agreed to facilitate the Proposed Development?	<p>SCC (Local Highway Authority) notes that no details of any diversion routes for walking, cycling or horse rider diversions have been made publicly accessible other than those in our responses to the examination (i.e., RR [RR-006], LIR [REP1-045]).</p> <p>SCC (PROW) provides details on current temporary closures and diversions for Public Rights of Way that they Highway Authority have administered. This is available on the SCC website.</p>

Reference	Question to:	Question	Local Authority Answer
			<p>Details of temporary traffic regulation orders administered through the DCO could be included on the SCC website. Full details would be required from the Applicant to enable this to be undertaken.</p> <p>Further information is provided by SCC to all affected Parish Councils and User Groups, with notices and maps displayed on site. For the proposed development this would be the full responsibility of the Applicant as part of the administering the DCO.</p>
1. Air quality and emissions			
AQ1.1.1	The Applicant		
AQ1.1.2	The Applicant		
AQ1.1.3	The Applicant		
AQ1.1.4	The Applicant		
AQ1.1.5	The Applicant		
AQ1.1.6	The Applicant		
AQ1.1.7	The Applicant		
AQ1.1.8	The Applicant		
AQ1.1.9	The Applicant		
AQ1.1.10	The Applicant		
AQ1.1.11	The Applicant		
AQ1.1.12	The Applicant		
AQ1.1.13	The Applicant		
AQ1.1.14	The Applicant		
AQ1.1.15	The Applicant		
AQ1.1.16	The Applicant		

Reference	Question to:	Question	Local Authority Answer
AQ1.1.17	The Applicant		
AQ1.1.18	The Applicant		
AQ1.1.19	The Applicant		
AQ1.1.20	The Applicant		
AQ1.1.21	The Applicant		
2. Approach to the EIA and the ES, including cumulative effects			
EA1.2.1	The Applicant		
EA1.2.2	The Applicant		
EA1.2.3	The Applicant		
EA1.2.4	The Applicant		
EA1.2.5	The Applicant Local planning authorities	<p>Section 4.10 of ES Chapter 4, the Project Description, [APP-072] assumes that the decommissioning impacts would be no worse than those assessed for construction. Is this a reasonable assumption in relation to all receptors for all topics, such as biodiversity and noise and vibration, bearing in mind the nature and amount of infrastructure to be broken up and removed?</p> <p>Would the following addition to Requirement 12 of the dDCO be beneficial?</p> <p><i>'The written scheme of decommissioning must include sufficient information to demonstrate the validity of the assumption made in the original Environmental Statement for the Proposed Development that</i></p>	<p>SCC (Planning) accepts that the Rochdale envelope based upon a worst-case scenario construction case within the ES would encompass sufficiently demolition of the proposed development at the end of its lifetime. It should be noted that the construction of the proposed development would include a significant amount of demolition of existing infrastructure including pylon towers.</p> <p>However, since the environmental sensitivities of the receiving environment may well change over the operational lifetime of the development (for example the presence or absence of particular species or habitats, the addition of further designated heritage assets, or the addition of new sensitive receptors for noise or vibration by reason of additional development in the locality), SCC would therefore support the inclusion of the suggested addition to Requirement 12.</p>

Reference	Question to:	Question	Local Authority Answer
		<i>decommissioning impacts would be no worse than those concluded for construction or provide new assessments for any types of impact for which this is not demonstrated.'</i>	
EA1.2.6	The Applicant		
EA1.2.7	The Applicant		
EA1.2.8	Local planning authorities	Do the local planning authorities agree with the list of plans and projects included in the cumulative effects assessment (ES Chapter 15 [APP-083])?	SCC (Planning) is in agreement.
EA1.2.9	The Applicant		
3. Biodiversity, ecology and nature conservation, including HRA matters			
EC1.3.1	The Applicant Natural England		
EC1.3.2	The Applicant		
EC1.3.3	The Applicant		
EC1.3.4	The Applicant		
EC1.3.5	The Applicant Natural England Local planning authorities	The LEMP [APP-182] includes proposals for woodland establishment through natural regeneration, using the local seed bank already present. Does the LEMP include sufficient information on which to base the establishment and management of the larger areas that extend some distance from existing woodland on arable soils? Would soil fertility need to be reduced and is further detail needed on control	SCC (Ecology) defers to BMSDC as the lead authority on ecology matters. SCC (Landscape) has expressed concerns about the proposals for natural regeneration of woodland within the LIR [REP1-045]. SCC considers that the LEMP [APP-182] does not include sufficient prescriptions for the establishment, aftercare and monitoring of such woodlands ([REP1-045], paragraphs 6.162 - 6.163). The proposed aftercare period of 5 years is wholly inadequate, and the proposals are not secured in the dDCO ([REP1-045], paragraphs 6.164. and 6.181).

Reference	Question to:	Question	Local Authority Answer
		<p>of weeds? Is further detail required on the measures that would be taken if the establishment of naturally regenerated woodland is not occurring satisfactorily? Is the proposed monitoring and aftercare period sufficient?</p>	<p>It is necessary to harvest seed from local donor sources to inoculate the regeneration areas and to ensure that emerging regeneration of scrub and trees is protected from browsing deer, rabbits and hare. Therefore, considerable thought will need to be given at sourcing and collecting of donor seed stock and it is essential that appropriate fencing (including rabbit fencing at its base) is installed around all natural regeneration areas.</p> <p>Weed control is not generally compatible with natural regeneration, as spraying and cutting is likely to destroy the woody species that are the desired outcome. Therefore, it is necessary that there is a high level of seed inoculation and robust protection of germinating trees and shrubs, as this will ensure that pernicious weeds are rapidly shaded out.</p> <p>Soil fertility does not need to be reduced.</p>
<p>EC1.3.6</p>	<p>The Applicant Natural England Local planning authorities</p>	<p>Section 9 of the LEMP [APP-182] appears to suggest that most areas of habitat (trees, woodlands, hedges, grasslands) created for mitigation, restoration, compensation and biodiversity net gain revert to the landowner after five years. Is this a correct understanding and do you believe that this is sufficient guarantee that the created habitat would provide its mitigation or compensation function in the longer term?</p>	<p>SCC (Ecology) defers to BMSDC as the lead authority on ecology matters.</p> <p>SCC (Landscape) considers that the hand-back period for any habitat should ensure that the habitat’s function and desired outcomes have been achieved or appropriately secured prior to handing back. Therefore, handing back after 5 years may be appropriate in some cases, but not in all, for example woodland.</p>
<p>EC1.3.7</p>	<p>Suffolk CC Babergh DC Mid Suffolk DC</p>	<p>The Suffolk councils’ position in their LIR [REP1-045] in relation to biodiversity impacts (at paragraphs 7.30 and 7.36) is unclear. While the Applicant’s ES [APP-075] concluded that there are no likely significant residual effects in relation to biodiversity receptors during construction or operation, the LIR</p>	<p>SCC (Ecology) defers to BMSDC as the lead authority on ecology matters.</p>

Reference	Question to:	Question	Local Authority Answer
		appears to conclude that there would be significant impacts during construction and decommissioning, <i>'There would be material impacts upon ecological features (designated sites, protected and Priority species and habitats).'</i> Can the position be clarified with specific instances and supporting evidence.	
EC1.3.8	Nick Miller		
EC1.3.9	Nick Miller		
EC1.3.10	The Applicant		
EC1.3.11	The Applicant Natural England		
EC1.3.12	The Applicant Natural England Local planning authorities	The list of plans and projects where in-combination effects could occur was fixed on the 31 January 2023 to allow the HRA to be finalised for submission [APP-057]. Have any further relevant plans or projects come forward or become known since then that might affect the in-combination assessment?	SCC (Planning) defers to BMSDC (Planning) in respect of the non-NSIP developments in the vicinity of Bramford substation.
EC1.3.13	The Applicant		
4. Compulsory Acquisition, Temporary Possession and other land or rights considerations			
CA1.4.1	Any Affected Person		
CA1.4.2	Any Affected Person		

Reference	Question to:	Question	Local Authority Answer
CA1.4.3	Land Partners LLP on behalf of Robert Shelley		
CA1.4.4	Foot Anstey LLP on behalf of Pivoted Power LLP		
CA1.4.5	Any Affected Person		
CA1.4.6	The Applicant		
CA1.4.7	The Applicant		
CA1.4.8	The Applicant		
CA1.4.9	The Applicant		
CA1.4.10	The Applicant		
CA1.4.11	Local planning authorities Local highway authorities	<p>Are any of the Councils in their roles as the local planning authority and the highway authority aware of:</p> <p>a) Any reasonable alternatives to the CA or the TP which is sought by the Applicant?</p> <p>b) Any areas of land or rights that the Applicant is seeking the powers to acquire that you consider would not be needed?</p>	<p>SCC (Local Highway Authority) notes that:</p> <p>a) where land is required for the purposes of this project outside of the existing highway boundary, SCC is not aware of other reasonable alternatives to secure these other than those proposed by the applicant.</p> <p>b) the areas of land required for highway access purposes will depend on the detailed design of these elements; for example, the land required to provide visibility splays, access roads and drainage.</p>
CA1.4.12	The Applicant		
CA1.4.13	The Applicant		
CA1.4.14	The Applicant		

Reference	Question to:	Question	Local Authority Answer
CA1.4.15	The Applicant		
CA1.4.16	The Applicant		
CA1.4.17	The Applicant		
CA1.4.18	The Applicant		
CA1.4.19	The Applicant		
CA1.4.20	The Applicant		
CA1.4.21	The Applicant		
CA1.4.22	The Applicant		
CA1.4.23	The Applicant		
CA1.4.24	Mead Farms		
CA1.4.25	Malcolm Frost		
CA1.4.26	Linda Keenan		
CA1.4.27	Land Partners LLP on behalf of Peter Nott		
CA1.4.28	Foot Anstey LLP on behalf of Pivoted Power LLP		
CA1.4.29	Royal Mail		
CA1.4.30	The Applicant		
CA1.4.31	The Applicant		
CA1.4.32	The Applicant		

Reference	Question to:	Question	Local Authority Answer
CA1.4.33	The Applicant		
CA1.4.34	Babergh DC		
CA1.4.35	The Applicant Babergh DC Assington PC		
5. Construction matters			
General construction matters			
CM1.5.1	The Applicant		
CM1.5.2	The Applicant		
CM1.5.3	The Applicant		
CM1.5.4	The Applicant		
CM1.5.5	The Applicant		
CM1.5.6	The Applicant		
CM1.5.7	The Applicant		
CM1.5.8	The Applicant		
CM1.5.9	The Applicant		
CM1.5.10	East Anglia Three Limited c/o Scottish Power Renewables		
CM1.5.11	The Applicant		
CM1.5.12	The Applicant Suffolk CC Essex CC	The Applicant's written summary of oral representations to Issue Specific Hearing 1 [REP1-024] notes that the provisional programme has been	SCC (Planning) provides the extract from the current planning permission (Ref. No: SCC/0018/19B/VOC) for Layham Quarry which will lay underneath an overhead lines section of the route and will provide a construction area for the proposed development. Condition 10 deals specifically with "Hours of Operation."

Reference	Question to:	Question	Local Authority Answer
		<p>prepared using 'standard industry working hours'. Can you provide any evidence to demonstrate that Sundays and bank holidays are or are not standard industry working hours?</p>	<p><i>Hours of Operation</i></p> <p>10. Except as provided at (a) – (c) below no operations authorised or required by this permission shall be carried out on the site except between the following times:</p> <ul style="list-style-type: none"> • 0700 to 1800 hours Monday to Friday • 0700 to 1300 hours Saturdays <p>a) No servicing, maintenance and testing of plant shall be carried out except between the following times:</p> <ul style="list-style-type: none"> • 0700 to 1800 hours Monday to Friday • 0700 to 1300 hours Saturdays. <p>b) No servicing, maintenance and testing of plant shall be carried out on Sundays, or on Bank/Public Holidays.</p> <p>c) For temporary operations undertaken for up to 8-weeks within any</p> <ul style="list-style-type: none"> • 12-month period, i.e., soil stripping or replacement, bund • construction or removal, the permitted hours shall be as follows: • 0800 to 1800 hours Monday to Friday • 0800 to 1300 hours Saturdays. <p>d) The above time restrictions shall not apply to environmental monitoring.</p> <p>e) There shall be no working on Sundays or Bank/Public Holidays.</p> <p>f) This condition shall not apply in cases of emergency when life, limb or property are in danger. The Minerals Planning Authority shall be notified, in writing, as soon as possible after the occurrence of any such emergency.</p> <p><i>Reason: to ensure the amenity of neighbouring properties and rural environment is maintained having regard to the National Planning Policy Framework, and the Minerals Core Strategy Adopted 2008.</i></p>

Reference	Question to:	Question	Local Authority Answer
			<p>SCC (Local Highway Authority) provides extracts from Scottish Power Renewable East Anglian ONE North windfarm and Sizewell C Nuclear Power Station Examinations.</p> <p><i>SPR EA1(N)</i></p> <p>The Code of Construction Practice states in 3.1 that the “<i>Onshore construction activities would normally be conducted during working hours of 7am to 7pm Monday to Friday and 7am to 1pm on Saturdays with no construction works on Sundays or bank holidays. Construction works may occur outside the above times where permitted in line with the DCO</i>”.¹</p> <p><i>SZC</i></p> <p>The Code of Construction Practice 1.2.1 states that: “<i>The site will require 24 hour working, 7 days per week, except for earthworks operations at the borrow pits, which must not be undertaken between 23:00 hours and 07:00 hours</i>”.²</p> <p>However, in transport terms restrictions were place on HGV movements in the Construction Traffic Management Plan 4.4.13 which places the following constraints:</p> <ul style="list-style-type: none"> • <i>Monday to Friday: During the early years, Sizewell C HGVs will be limited to arrive at the main development site between the hours of 07:15-21:00 and during the peak construction phase, once the Sizewell link road and two village bypass are in use, Sizewell C HGVs will be limited to arrive at the main development site between the hours of 07:00-21:00. The latest departure of Sizewell C HGVs from the main development site will be 23:00.</i>

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-009669-8.1%20EA1N%20Outline%20Code%20of%20Construction%20Practice.pdf>

² [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-008183-Carly%20Vince%20-%20Other-%20Code%20of%20Construction%20Practice%20\(clean%20version\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-008183-Carly%20Vince%20-%20Other-%20Code%20of%20Construction%20Practice%20(clean%20version).pdf)

Reference	Question to:	Question	Local Authority Answer
			<ul style="list-style-type: none"> • <i>Saturday: Sizewell C HGVs will be limited to arrive at the main development site between the hours of 08:00-13:00. The latest departure of Sizewell C HGVs from the main development site will be 14:00.</i> • <i>Sundays and public holidays: There will be no Sizewell C HGV movements to/from the main development site from the wider highway network on Sundays or on public holidays.</i>³
CM1.5.13	The Applicant		
CM1.5.14	The Applicant		
CM1.5.15	The Applicant		
CM1.5.16	The Applicant		
CM1.5.17	The Applicant		
CM1.5.18	The Applicant		
CM1.5.19	The Applicant		
CM1.5.20	The Applicant		
CM1.5.21	The Applicant		
CM1.5.22	The Applicant		
CM1.5.23	The Applicant		
CM1.5.24	The Applicant		
CM1.5.25	The Applicant		
CM1.5.26	The Applicant		
CM1.5.27	The Applicant		
CM1.5.28	The Applicant		
CM1.5.29	The Applicant		

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-004831-D2%20-%20Sizewell%20C%20Project%20-%20Other-%20Construction%20Traffic%20Management%20Plan.pdf>

Reference	Question to:	Question	Local Authority Answer
CM1.5.30	The Applicant		
CM1.5.31	The Applicant		
CoCP and control documents			
CM1.5.32	The Applicant		
CM1.5.33	The Applicant		
CM1.5.34	The Applicant		
CM1.5.35	The Applicant		
CM1.5.36	The Applicant		
CM1.5.37	The Applicant		
CM1.5.38	The Applicant		
CM1.5.39	The Applicant		
CM1.5.40	The Applicant		
CM1.5.41	The Applicant		
CM1.5.42	The Applicant		
CM1.5.43	The Applicant		
CM1.5.44	The Applicant		
CM1.5.45	The Applicant		
CM1.5.46	The Applicant		
CM1.5.47	The Applicant		
CM1.5.48	The Applicant		
CM1.5.49	The Applicant		
CM1.5.50	The Applicant		
CM1.5.51	The Applicant		
CM1.5.52	The Applicant		

Reference	Question to:	Question	Local Authority Answer
CM1.5.53	The Applicant		
CM1.5.54	The Applicant		
CM1.5.55	The Applicant		
CM1.5.56	The Applicant		
CM1.5.57	The Applicant		
CM1.5.58	The Applicant		
CM1.5.59	The Applicant		
CM1.5.60	The Applicant		
CM1.5.61	The Applicant		
CM1.5.62	Braintree DC Mid-Suffolk DC Babergh DC Essex CC Suffolk CC Environment Agency Natural England	<p>The CEMP [APP-177], CTMP [APP-180], MWMP [APP-181] and LEMP [APP-182] appear to be submitted as final documents, without a requirement to submit and approve detailed versions in the dDCO [APP-034]. Could you:</p> <ul style="list-style-type: none"> comment on the Applicant’s proposed approach; identify any outstanding concerns with the content of the plans; describe the steps considered necessary to resolve outstanding concerns by close of Examination; and provide comments on the Applicant’s proposed approach to managing future change of these management plans, i.e., that the Applicant would 	<p>SCC (Local Highways Authority) is unhappy with the applicants proposed approach as they have made it clear that the detail of the project will only be agreed following appointment of a contractor.</p> <p>In respect to transport issues in the Construction Traffic Management Plan (CTMP) [APP-180] concerns are:</p> <ul style="list-style-type: none"> In 1.2.8, the Applicant states the CTMP require agreement with LPA rather than LHA. In 2.2, the Applicant states that the detailed construction program will be subject to change, for example the cable drums are only “anticipated” to be delivered at the locations stated in 5.3.10 or that the “proposed construction routes will be agreed with the contractor” (5,4,2). In 5.4.14, it is “anticipated” that temporary signage will be erected along construction routes. With respect of the Travel Plan elements, much is worded in terms of “anticipated” (7.2.2, 7.2.3, 7.2.4, 7.3.1, 7.3.3, 7.3.10, 7.4.1, 7.4.3) or “assumed” (7.2.4, 7.3.11).

Reference	Question to:	Question	Local Authority Answer
		provide details of the change together with evidence of stakeholder engagement, and request that the relevant planning authority endeavours to respond to confirm its consent to the change or reasons for not accepting within 28 days?	<p>The above are important as the applicant has not secured such measures as the maximum daily HGV movements, HGV routes, nor shift pattern timing within the management documents.</p> <p>In SCC (Local Highway Authority)'s view, key embedded mitigation should be secured in the management plans and where changes or details change an approval process involving the LHA are required (LIR [REP1-045], paragraphs 12.57, 12.63 and 12.75 to 12.94).</p> <p>SCC (Landscape) has expressed its concerns relating to the CEMP [APP-177], LEMP [APP-182] and dDCO [APP-034] in the LIR [REP1-045], paragraphs 6.148-6.183. In SCC (Landscape)'s view, the CEMP and LEMP should be considered as outline documents, however, even as outline documents they require revision.</p>
CM1.5.63	The Applicant		
CM1.5.64	The Applicant		
6. Draft Development Consent Order			
DC1.6.1	The Applicant		
DC1.6.2	The Applicant		
DC1.6.3	The Applicant Local planning authorities	Paragraph 21 of PINS Advice Note 15: <i>Drafting Development Consent Orders</i> deals with the issue of defining 'commencement' - advance works and environmental protection and suggests they are generally unlikely to find favour with the SoS. The Applicant's associated submission is noted at paragraphs 3.6.14 and 3.6.15 of the Explanatory Memorandum (EM) [APP-035]. Nevertheless, can the range of potential 'pre-	<p>In the LIR [REP1-045] and <i>Deadline 2 Comments on Applicant's Comments on Relevant Representations</i> ("the Comments") [REP2-013] SCC (Legal) states that several of the carve-outs of the definition of "commence" would seem capable of giving rise to significant environmental effects including: the demolition of existing buildings, site clearance, the provision of temporary accesses and the erection of any temporary means of enclosure.</p> <p>SCC notes that paragraph 3.6.15 of the Explanatory Memorandum [APP-035] states –</p>

Reference	Question to:	Question	Local Authority Answer
		commencement operations' in Article 2 of the dDCO reasonably be described as either <i>de minimis</i> or having minimal potential for adverse impact?	<p>“... The works and operations within the definition of “pre-commencement operations” are either <i>de minimis</i> or have minimal potential for adverse impacts ...”</p> <p>In paragraph 17.7 of the LIR [REP1-045] and Row (i) of the Comments [REP-013] SCC (Legal) states it would welcome “further explanation as to which of the carve-outs are <i>de minimis</i> and which have minimal potential for adverse impacts. The Councils would also welcome an explanation of where each has been assessed”.</p> <p>SCC would still welcome that explanation and would propose to respond to that explanation in due course.</p>
DC1.6.4	The Applicant		
DC1.6.5	The Applicant Local planning authorities	Is the definition of ‘pre-commencement operations’ in Article 2 sufficiently clear and unambiguous? For example, ‘demolition of existing buildings’ could be read as meaning either the surveys required for the demolition of existing buildings or the actual demolition of existing buildings. Is amendment required in this or other respects?	SCC (Planning) refers the ExA. to the previous answer.
DC1.6.6	The Applicant		
DC1.6.7	The Applicant		
DC1.6.8	The Applicant		
DC1.6.9	Braintree DC Essex CC		
DC1.6.10	The Applicant		
DC1.6.11	The Applicant		
DC1.6.12	The Applicant		
DC1.6.13	The Applicant		

Reference	Question to:	Question	Local Authority Answer
DC1.6.14	The Applicant		
DC1.6.15	The Applicant		
DC1.6.16	The Applicant Local planning authorities	In exercising rights conferred by Article 5, is it sufficiently clear on the face of the dDCO, without recourse to supporting documents, where construction activity should and should not take place, e.g., to avoid certain features or environmentally sensitive areas?	SCC (Legal) considers it is necessary to consider supporting documents in the situation described.
DC1.6.17	The Applicant		
DC1.6.18	The Applicant		
DC1.6.19	The Applicant		
DC1.6.20	The Applicant		
DC1.6.21	The Applicant		
DC1.6.22	The Applicant		
DC1.6.23	The Applicant		
DC1.6.24	The Applicant		
DC1.6.25	The Applicant		
DC1.6.26	The Applicant		
DC1.6.27	The Applicant		
DC1.6.28	The Applicant		
DC1.6.29	The Applicant		
DC1.6.30	The Applicant		
DC1.6.31	Essex CC Suffolk CC	Save for the disapplication provisions subject of the previous question, are the highway authorities content with	In the LIR [REP1-045], paragraphs 12.21 and 12.22, SCC (Local Highway Authority) expressed concerns regarding disapplication of some elements of the New Roads and Street Works Act 1991. These are specifically:

Reference	Question to:	Question	Local Authority Answer
		the disapplication of the New Roads and Street Works Act 1991 that is sought by Articles 13 (3) and 13 (4) in relation to works executed under Article 12? If not, please explain why not and advise how those provisions might be changed to address your concerns.	<ul style="list-style-type: none"> section 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 coordinating street works. Co-ordinating street works can be very helpful to developers, including developers of nationally significant infrastructure projects, and SCC considers the retention of section 56 would benefit the Applicant. section 73C (materials, workmanship and standard of resurfacing) so that all repairs to the highway are of acceptable quality. <p>SCC (as Local Highway Authority) would request that these elements are removed, or similar provisions included in any side agreement to protect the authority's position.</p>
DC1.6.32	The Applicant		
DC1.6.33	The Applicant		
DC1.6.34	The Applicant		
DC1.6.35	The Applicant		
DC1.6.36	The Applicant		
DC1.6.37	The Applicant		
DC1.6.38	The Applicant		
DC1.6.39	The Applicant		
DC1.6.40	The Applicant		
DC1.6.41	Statutory Undertakers		
DC1.6.42	Statutory Undertakers		
DC1.6.43	The Applicant		
DC1.6.44	Any Affected Person		
DC1.6.45	The Applicant		

Reference	Question to:	Question	Local Authority Answer
DC1.6.46	The Applicant		
DC1.6.47	Any Affected Person		
DC1.6.48	The Applicant		
DC1.6.49	The Applicant		
DC1.6.50	The Applicant		
DC1.6.51	Local planning authorities	Are you satisfied that Articles 46 (2) and (3) provide a reasonable and proportionate defence to statutory nuisance. If not, why not?	<p>Paragraph 3.50.4 of the Explanatory Memorandum [APP-035] says: “This article is based on article 7 of the general model provisions ... This provision is appropriate for inclusion in the Order to ensure that nuisance claims are considered in the context of the wider benefits of the authorised development”.</p> <p>However, article 7 of the general model provisions does not include paragraphs (2) and (3) of Article 46. Similarly, paragraphs (2) and (3) are not included in other DCOs promoted by the Applicant which include the defence to proceedings in respect of statutory nuisance. For instance, they do not appear in –</p> <ul style="list-style-type: none"> • article 37 of the National Grid (Richborough Connection Project) DCO 2017 (SI 2017/817); • article 38 of the National Grid (Hinkley Point C Connection Project) Order 2016 (SI 2016/49); • article 40 of the National Grid (North London Reinforcement Project) Order 2014 (SI 2014/1052); and • article 15 of the National Grid (King’s Lynn B Power Station Connection) Order 2013 (SI 2013/3200). <p>It is not clear from the Explanatory Memorandum [APP-035] whether paragraphs (2) and (3) have found favour with the Secretary of State before or why they are required in this Order.</p> <p>While SCC (Legal) will await the Applicant’s justification for the proposed inclusion of paragraphs (2) and (3) before reaching a definitive conclusion, their absence from the model provisions and from each DCO previously promoted by the Applicant makes it difficult for SCC to consider them necessary. If they are not necessary, they should not be included in the Order.</p>
DC1.6.52	The Applicant		

Reference	Question to:	Question	Local Authority Answer
DC1.6.53	The Applicant		
DC1.6.54	The Applicant		
DC1.6.55	The Applicant		
DC1.6.56	Braintree DC Essex CC		
DC1.6.57	Environment Agency		
DC1.6.58	The Applicant Local planning authorities	Whose would be responsible for registering Article 53's provisions as a local land charge, including any associated cost, as Article 53 (6) seeks?	It is not clear from Article 53 who would be responsible for registering the requirement to consult under Article 53 as a local land charge. In any event, if Article 53 is retained, SCC (Legal) considers the Applicant should be responsible for any associated costs.
DC1.6.59	The Applicant Local planning authorities	A proposal's implications for the construction and operation of the Proposed Development would be capable of being a material consideration in determining any application for planning permission made wholly or partly within the Order Limits by virtue of Section 70 of the Town and County Planning Act 1990. In that context, is the Article 53 proposal to add to local planning authorities' administrative burden proportionate and necessary?	In this context, SCC (Legal) does not consider the Article 53 proposal to add to local planning authorities' administrative burden to be proportionate and necessary. The orthodox position is that DCOs do not include a safeguarding article and SCC does not consider it necessary to depart from that position.
DC1.6.60	The Applicant Local planning authorities	The local planning authority is under a legal duty to determine applications for planning permission according to principles of administrative law. If this is not done, there is opportunity for challenge under existing legislation	In relation to Article 53, SCC (Legal) does not consider the existing legal checks and balances to be insufficient to protect the Applicant's interests.

Reference	Question to:	Question	Local Authority Answer
		and public law principles. In relation to the proposed Article 53, do you consider the existing legal checks and balances to be insufficient to protect the Applicant's interests?	
DC1.6.61	The Applicant Local planning authorities	Article 53 (5) of the dDCO would require that the matters raised in the undertaker's representations are 'addressed'. This contrasts with Section 70 (2) (c) of Town and County Planning Act 1990 that requires a local planning authority to 'have regard to' the listed considerations. Would this facet of the Article's wording arguably fetter a local planning authority's implementation of the provision of Town and County Planning Act 1990 by including the word 'addressed' as opposed to 'have regard to'?	<p>SCC (Legal). In section 70(2)(c) of the TCPA, Parliament has demanded that, in dealing with an application for planning permission, the LPA must have regard to certain things; however, Parliament has not gone further and demanded that all matters arising from those things must be addressed.</p> <p>The duty under section 70(2)(c) of the TCPA 1990 is less onerous than that in Article 53(5). To "have regard" to something is to consider it and once the thing has been considered, the duty is discharged. By introducing the duty to address matters raised in representations, Article 53(5) goes much further than the equivalent provision in primary legislation and does so to an unreasonable degree.</p> <p>Article 53(5) also goes further than the equivalent provision in the Thames Tideway Tunnel DCO 2014 (SI 2014/2384) which states:</p> <p>"In determining an application for planning permission a relevant planning authority must take into account any representations received in accordance with this article" (article 52(7)).</p> <p>There is no explanation from the departure from precedent in the Explanatory Memorandum [APP-035] which merely states: "Paragraph (5) is amended to ensure that matters raised in representations received in accordance with this article are addressed" (paragraph 3.57). This is contrary to paragraph 1.5 of Advice Note 15 (Drafting Development Consent Orders), which requires an explanation for the divergence in wording from a consented DCO.</p>
DC1.6.62	The Applicant Local planning authorities	In relation to Article 53, the EM [APP-035] cites the Thames Tideway Tunnel Order as precedent but does not explain what it considers to be the factual similarities between the	<p>SCC (Legal) does not consider the Thames Tideway Tunnel project and the instant application to be comparable.</p> <p>The difference in context between the two applications is stark. The Thames ExA summarised the context of that project as part of the justification for</p>

Reference	Question to:	Question	Local Authority Answer
		<p>consented scheme and the Proposed Development? How are they considered to be comparable?</p> <p>Are the Thames Tideway Tunnel Order and the Proposed Development not distinguishable in terms of context with this being a predominantly rural area subject to comparatively less development pressure?</p>	<p>recommending the inclusion of article 52 (safeguarding) in the Thames Tideway Tunnel DCO 2014 (SI 2014/2384). They said –</p> <p>“We consider that the critical consideration is the need for the undertaker to have to manage a project of such complexity, scale and within a dense predominantly urban environment with a wide variety of property interests and rights above, on, in and under the ground. Therefore we consider that it is prudent, and on balance appropriate, to confirm this power as drafted by the Applicant”.</p> <p>[Paragraph 20.173 of the <i>Examining authority’s Report of Findings and Conclusions and Recommendation to the Secretary of State for Communities and Local Government and the Secretary of State for Environment, Food and Rural Affairs</i> dated 12 June 2014].</p> <p>The language of paragraph 20.173 cannot be used to describe the context of the instant application.</p> <p>Another important distinction between the instant application and Thames is that on 15 March 2013, the Secretary of State for Communities and Local Government issued consultation and safeguarding directions for development affecting any tunnel alignments that formed part of the Thames Tideway Tunnel project. Those directions superseded earlier safeguarding directions which had been made in 2012. So, the safeguarding article in the Thames DCO was made in the context of an existing safeguarding direction by the Secretary of State. The same cannot be said here.</p>
DC1.6.63	The Applicant		
DC1.6.64	Local planning authorities	<p>Do you have any observations on the Applicant’s response to Action Point 21 (AP21) arising from ISH1 that is set out on pages 14 and 15 of [REP1-034]?</p>	<p>Despite the explanation provided, the Works Plans are not straightforward to interpret. Page 15 of [REP1-034] says, to assist the reader, the General Arrangement Plans [APP-018], contains additional information. However, the status of the General Arrangement Plans is not clear (they are not mentioned in the DDCO) it is not clear what the status of that dDCO and SCC (Legal) would welcome conformation on this point.</p>

Reference	Question to:	Question	Local Authority Answer
DC1.6.65	The Applicant		
DC1.6.66	The Applicant		
DC1.6.67	The Applicant		
DC1.6.68	The Applicant		
DC1.6.69	Local planning authorities	Does the Applicant’s response to Action Point 22 (AP22) arising from ISH1 address local planning authorities’ concerns that were raised in the preceding question? ([REP1-034], at page 15.)	<p>SCC (Legal) notes that, rather than add the siting of the construction compounds to the Works Plans, the Applicant intends to include the locations of the compounds in an updated version of the CEMP, which will be provided at Deadline 3.</p> <p>SCC will need to consider the updated CEMP carefully before commenting further on this point.</p>
DC1.6.70	The Applicant		
DC1.6.71	Local planning authorities	Do you wish to respond to the Applicant’s remarks about ‘Associated Development’ in its comments on RRs [REP1-025] at page 80?	<p>On page 80 of [REP-025], the Applicant responds to comments made by Essex County Council [RR-004] and Braintree District Council [RR-002]. Nevertheless, SCC (Legal) welcomes the opportunity to respond to the Applicant’s remarks about Associated Development (“AD”).</p> <p>The Applicant states that, in determining the extent of AD, it has had regard to current Guidance (<i>Planning Act 2008: associated development applications for major infrastructure projects</i>) issued by the Ministry of Housing, Communities & Local Government and dated April 2013.</p> <p>Paragraph 5(iv) of the Guidance says “[AD] should be proportionate to the nature and scale of the principal development”.</p> <p>It seems to SCC that certain of those matters listed as AD go wider than would seem appropriate; for instance: (b) bridge (l) demolition of existing buildings or structures (m) temporary offices etc.</p> <p>In the first instance, SCC would welcome further information as to where this AD has been assessed.</p>
DC1.6.72	The Applicant		

Reference	Question to:	Question	Local Authority Answer
DC1.6.73	The Applicant		
DC1.6.74	The Applicant		
DC1.6.75	The Applicant Local planning authorities	Article 2 of the dDCO includes a definition of 'commence' but neither it nor Requirement 1 define 'begin' for the purposes of Requirement 2 (1). For the sake of precision and enforceability, is such a definition required?	<p>SCC (Legal). Section 11 of the Interpretation Act 1978 says - "Where an Act confers power to make subordinate legislation, expressions used in that legislation have, unless the contrary intention appears, the meaning which they bear in that Act".</p> <p>The Planning Act 2008 ("2008 Act") confers power to make development consent orders which, as statutory instruments, are subordinate legislation and so expressions used in the 2008 Act have the same meaning in DCOs, unless the DCO includes a contrary intention.</p> <p>By Requirement 2(1) of the instant DCO, the authorised development must begin no later than the end of a period of 5 years "beginning with the date on which this Order comes into force". [Our emphasis].</p> <p>Section 155(1) of the 2008 Act says - "For the purposes of this Act ... development is taken to begin on the earliest date on which any material operation comprised in, or carried out for the purposes of, the development begins to be carried out". [Our emphasis].</p> <p>Owing to section 11 of the Interpretation Act, since no contrary intention appears in Requirement 2 of the instant DCO, start date for beginning the authorised development is in accordance with section 155(1) of the 2008 Act i.e. "on the earliest date on which any material operation comprised in, or carried out for the purposes of, the development begins to be carried out".</p> <p>In the light of the above, SCC does not consider a definition of "begin" is required; however, if a new sub-paragraph (3) was included in Requirement 2 and which defined "begin" as having the same meaning as in section 155(1) of the 2008 Act, SCC would not object.</p> <p>As mentioned in DC1.6.105, SCC's concern is the Applicant is carving too much out for pre-commencement works.</p>

Reference	Question to:	Question	Local Authority Answer
DC1.6.76	The Applicant		
DC1.6.77	Local planning authorities	Is the distinction between the applicability of the time limits in Requirement 2 precise and enforceable? If not, how should it be changed?	See the reply to DC1.6.75.
DC1.6.78	Local planning authorities	Notwithstanding how 'stage' is defined in Requirement 1 of the dDCO, is it sufficiently clear to you what it means in the context of Requirement 3?	<p>Before development can commence, a single document setting out all “stages” of the development will be submitted to the relevant planning authority. Paragraph 4.3.10 of the Explanatory Memorandum states –</p> <p>“National Grid’s <u>intention</u> is to define the stages of the authorised development once detailed design has been undertaken and once it has been agreed with its main works contractor(s) how the project will be delivered”. [Our underlining]. The detail about the document’s likely contents is also included in the Explanatory Memorandum. For instance, paragraph 4.3.11 –</p> <p>“It is <u>anticipated</u> that the staging plan to be submitted pursuant to Requirement 3 will specify: (a) the spatial scope of each stage of the authorised development (i.e. the geographical area(s) within which works are to take place), (b) the temporal scope of each stage of the authorised development (i.e. when the works are likely to commence and to be completed) and (c) the works to be carried out in each case”. [Our underlining].</p> <p>The underlined words hint at a lack of certainty in the plans for the document and it might be sensible to suggest that a new paragraph be added to the Requirement, setting out what the document will include e.g. the definition of “stage” could be amended so that those matters listed under paragraphs (a) to (c) of paragraph 4.3.11 are included in the definition. (None of the precedents included similar detail; however, this Requirement has become more detailed with each iteration).</p> <p>SCC (Legal) notes the uncertainty regarding the meaning of “stage” was an issue during the Examination of the order which became the National Grid (Richborough Connection Project) Development Consent Order 2017 and the matter was summarised as follows in the ExA’s Report –</p> <p>“10.7.24 It was not clear to the Panel or to the local authorities what the stages of the authorised development were and hence the clarity of the requirement was lacking. We asked written questions and probed the matter at all three DCO hearings during the Examination.</p>

Reference	Question to:	Question	Local Authority Answer
			<p>10.7.25 In response to FWQs, the Applicant explained that stages would only be defined after a construction contractor was appointed and that these stages would be defined by activities [REP2-016, Q1.5.33].</p> <p>10.7.26 At DCO1, it was evident that the Applicant's response had caused confusion amongst the Panel and the local authorities. The local authorities argued amongst other things, that the stages should be geographically based; that the details to be submitted should include a defined plan showing the location that the stage related to as well as the relationship between that stage; and that the preceding and acceding stages should be included [EV-021 to EV-024]. After extensive discussion, matters were still unclear and so the Applicant agreed to provide a post hearing note at DL3 with a fuller explanation of 'stages'.</p> <p>10.7.27 The post hearing note explains that the reference to 'activities' reflects that stages would not necessarily be defined solely by reference to geographical location or by activity because both terms are used interchangeably by the Applicant for much of the works contemplated. However, the Applicant confirmed that the written scheme setting out all of the stages would include references to defined sections or part of the authorised development. The Applicant provided two examples to aid understanding. Firstly, the construction of the 400kV overhead line (Work No. 1), the Applicant explained, could be a stage of the authorised development in itself. Secondly, the removal of the existing 132kV overhead line could also be a stage. Each stage of any part of the authorised development (for example removal of the PX 132kV line) could be undertaken as one stage or broken down further. The Applicant confirmed that this level of detail would form part of the written scheme as required under Requirement 4, to be submitted to and approved by the local authorities [REP3-023].</p> <p>...</p> <p>10.7.29 The Panel gives weight to the signed SoCG with the Joint Councils as the discharging authorities for many of the requirements, which confirms that they are content with the Applicant's explanation of stages and the Applicant's confirmation that it would work closely with the local authorities in preparing and agreeing the written scheme required under 4 (2) [REP8-014]. The ExA is therefore now satisfied that the intent of the requirement is clear and includes it in the rDCO". In the first instance, an alternative to amending the drafting of Requirement 3 would be to ask the applicant to provide an explanation similar to that given during the Richborough examination.</p>

Reference	Question to:	Question	Local Authority Answer
DC1.6.79	The Applicant Local planning authorities	Should the written scheme referred to in Requirement 3 (1) be subject to approval by the relevant planning authority within a stated time period? If not, why not?	<p>Requirement 3 is based on the following precedents: Requirement 4 of the National Grid (Richborough Connection Project) Development Consent Order 2017, Requirement 4 of the National Grid (Hinkley Point C Connection Project) Order 2016, and Requirement 3 of the National Grid (North London Reinforcement Project) Order 2014.</p> <p>It is not identical to any of the precedents and there is one important difference between the instant requirement and the precedents: each of the precedents requires the document i.e. the “written scheme” to be approved by the planning authority, following consultation with other bodies (which in each case includes the highway authority). For instance, Requirement 4(1) of the Richborough Connection Project DCO states –</p> <p>“4.—(1) The authorised development may not commence until a written scheme setting out all the stages of the authorised development has been submitted to and approved by the relevant planning authority following consultation with the highway authority”.</p> <p>[Differences with Requirement 3(1) of the Bramford to Twinstead dDCO shown highlighted and in bold].</p> <p>SCC (Legal) considers the scheme should be subject to the approval of the relevant planning authority, following consultation with the highway authority; however, since no explanation for the departure from the precedents is given in the Explanatory Memorandum, SCC will consider carefully the applicant’s explanation for the change.</p>
DC1.6.80	Local planning authorities	Should any amendments to the written scheme, referred to in Requirement 3 (2), be subject to approval by the relevant planning authority? If so, why?	<p>The three precedents mentioned in the reply to DC1.6.79 do not include an equivalent provision to instant Requirement 3(2); however, if paragraph (1) is to be amended per the preceding paragraph, SCC would suggest paragraph (2) is amended along the following lines –</p> <p>“(2) Any revisions to the written scheme referred to in sub-paragraph (1) above must be submitted to and approved by the relevant planning authority following consultation with the highway authority in advance of the commencement of the stage of the authorised development to which the revisions relate”.</p> <p>[Amendments shown highlighted and in bold].</p> <p>Although the ExA has not asked a question about Requirement 3(3), SCC wonders whether that provision might be improved if amended as follows –</p>

Reference	Question to:	Question	Local Authority Answer
			<p>“(3) Written notice of the commencement and completion of construction for of each stage of the authorised development, and the operational use of that part stage of the authorised development, must be given to the relevant planning authority within 10 business days of the relevant event occurring”.</p> <p>If the Applicant disagrees, SCC would welcome an explanation as to what “that part” refers to.</p>
DC1.6.81	The Applicant		
DC1.6.82	Suffolk CC Babergh DC Mid Suffolk DC	Requirement 4 (3) refers to ‘ <i>other discharging authority as may be appropriate to the relevant plan concerned</i> ’. Would this not address your concern that any departure from the CTMP should be agreed with the relevant highway authority?	<p>SCC (Local Highway Authority) considers that it would be helpful if this explicitly referred to the Local Highway Authority to avoid potential dispute on the appropriateness of the discharging authority.</p> <p>This would be consistent with the test of precision that each planning condition must satisfy, per <i>Circular 11/95: Use of conditions in planning permission</i>.</p>
DC1.6.83	The Applicant		
DC1.6.84	The Applicant		
DC1.6.85	Suffolk CC Babergh DC Mid Suffolk DC	Following on from your comment in paragraph 6.26 of your LIR [REP1-045], can you specify which Requirement(s) you consider need to be amended and suggest wording that would address your concerns?	<p>The point here is that SCC (Legal) has concerns about the management plans and considers Requirement 4 (management plans) should provide for the preparation of more detailed management plans, which would be subject to a further approval process.</p> <p>Further detail is set out in the reply to DC1.6.105.</p>
DC1.6.86	The Applicant Local planning authorities	Should Requirement 8 refer to the baseline information and assessment set out in the Arboricultural Impact Assessment [REP1-011]? If not, why not?	<p>SCC (Landscape) considers that the plan referred to in requirement 8 should be based on the up-to-date information and assessment of the AIA [REP1-011]. However, rather than cross-referencing relevant information back to the AIA, all relevant information should be contained in the detailed plan; any deviations from previously consented documents (such as the AIA, LEMP or the Vegetation Reinstatement Plan) should be clearly marked and identified on the detailed plan.</p>
DC1.6.87	The Applicant Local planning authorities	<p>Should the plan submitted under Requirement 8(1) also include:</p> <ul style="list-style-type: none"> tree protection plans detailing temporary physical tree 	<p>SCC (Landscape) considers that all the points listed are relevant to the purpose of the plan submitted under Requirement 8(1) and should therefore be included.</p>

Reference	Question to:	Question	Local Authority Answer
		<p>protection measures according to BS 5837:2012;</p> <ul style="list-style-type: none"> • a schedule of any proposed tree and hedgerow management to facilitate retention; • specifications for temporary physical protection for retained and vulnerable trees; and • details of an auditable system of compliance with the approved protection measures? <p>If not, why not?</p>	<p>With regards to the tree protection plans, it will be important to choose an appropriately fine-grain scale for any drawing included in the plan, so that the various elements in the plan, not least tree protection fence lines, remain clearly legible. An over-reliance on colour-coding should be avoided.</p>
DC1.6.88	The Applicant		
DC1.6.89	The Applicant Local planning authorities	<p>Should Requirement 9 also refer to the need to include details of ground cultivation for planting, five-year maintenance proposals, and arrangements for the identification and replacement of any failures?</p> <p>The Applicant is referred to the Yorkshire Green dDCO as an example.</p>	<p>SCC (Landscape) considers that Requirement 9 should include appropriate specifications, which include details of ground preparation, in particular de-compaction, and subsequent cultivation, appropriate aftercare and maintenance proposals, weed control / use of herbicides, and arrangements for the identification and replacement of any failures, including regular reports to, and site inspections by representatives of the relevant local authority. The plan should also include a programme that details when individual prescriptions are to be carried out, at what frequency and for how long.</p>
DC1.6.90	The Applicant		
DC1.6.91	The Applicant Local planning authorities	<p>In the interests of clarity, do you agree that the maintenance arrangements in Requirement 10 (3) would be better part of the reinstatement planting plan to be agreed by the relevant planning authority and thus should be included in that plan and referred to in Requirement 9? If not, please explain why not.</p>	<p>SCC (Landscape) agrees that the maintenance arrangements in Requirement 10(3) form an integral part of the reinstatement planting plan and prescriptions should be included within the plan.</p> <p>A distinction between the Plan itself and its implementation and maintenance into two separate requirements will, however, be useful for the discharge of these requirements. It may be necessary to include in Requirement 10(3) that all planting carried out under the agreed plan shall be maintained in accordance with the provisions and prescriptions of the plan.</p>

Reference	Question to:	Question	Local Authority Answer
DC1.6.92	The Applicant		
DC1.6.93	Suffolk CC Babergh DC Mid Suffolk DC	What wording would you suggest in place of Requirement 11 as drafted?	<p>Save for the point made in the reply to DC1.6.105, SCC (Local Highway Authority) does not necessarily seek to have Requirement 11 reworded. SCC notes that the requirement only covers construction or alteration of accesses and not the wider highway activities. SCC would suggest that either (i) Requirement 11 is amended to provide for those activities or (ii) the Applicant agrees to the inclusion of protective provisions in the dDCO which will address SCC’s concerns or (iii) the Applicant and SCC enter into a highways side agreement to cover SCC’s concerns.</p> <p>SCC would expect any protective provisions or side agreement to include the following –</p> <p>The recovery of reasonable costs including but not limited to:</p> <ul style="list-style-type: none"> • Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants’ occupation or use of the highway (if applicable). • Visual and structural condition surveys of the highway (A134, A1071, B1508, B1069) and contributions towards structural repairs to monitor damage to the highway (in accordance with the provisions of Section 59 Highways Act 1980); • Surveys and assessment of highway structures to facilitate AIL movements. • Creation of temporary traffic regulation orders where not included in Schedules; • Issue of permits and licenses; • Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements; • Technical approval and inspection of highway accesses (Requirement 11); and • Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PROW Strategy etc).
DC1.6.94	The Applicant		
DC1.6.95	The Applicant		
DC1.6.96	The Applicant		

Reference	Question to:	Question	Local Authority Answer
DC1.6.97	Essex CC Braintree DC		
DC1.6.98	The Applicant		
DC1.6.99	The Applicant		
DC1.6.100	The Applicant		
DC1.6.101	The Applicant		
DC1.6.102	Local planning authorities	Can you respond to the Applicant's submission on 'Timeframes for Determining Applications and Fees' in its comments on RRs [REP1-025] at page 82?	<p><u>Timescales</u> The timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in Advice Note 15. The Explanatory Memorandum [APP-035] justifies the shorter timescales as follows – “Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from those recommended in Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address” (paragraph 4.4.2). This is an unconvincing argument: the 28 day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note 15) is unlikely to affect “the immediate and pressing national need which the project is intended to address”. While the SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the time-frame to 28 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to the circumstances summarised in the preceding paragraph, SCC considers a 56-day decision-making period would be reasonable.</p> <p><u>Fees</u> The fees proposed in paragraph 3(1) are unreasonably low and need to be increased.</p> <p><u>Additional comments</u></p>

Reference	Question to:	Question	Local Authority Answer
			<p>SCC (Legal) notes the Applicant’s comment [REP1-025] that “its proposed approach in terms of both the timescales and fees for determining applications submitted pursuant to the DCO (if made) is reflective of the approach successfully adopted by the Applicant in relation to the delivery of other linear infrastructure projects, including those spanning multiple administrative boundaries”.</p> <p>SCC cannot comment on the success or otherwise of other projects the Applicant has promoted; SCC can, however, comment on the effect of hosting several NSIPs in its administrative area. SCC’s experience has led it to conclude that Schedule 4 would be inappropriate in its present form for the instant application. That, surely, is a more appropriate test to apply than the “one size fits all” approach which the Applicant seems to be suggesting. As Advice Note 15 states: “It is not sufficient for an Explanatory Memorandum to simply state that a particular provision has found favour with the Secretary of State previously; the ExA and Secretary of State will need to understand why it is appropriate for the scheme applied for”.</p> <p>In respect of the proposed “shadow submissions” mentioned by the Applicant [REP1-025], NSIP promoters in Suffolk whose DCOs include timeframes which are more consistent with those in Advice Note 15 do this already. While SCC welcomes the shadow submissions” suggestion, it will be necessary for more realistic deadlines to be provided.</p> <p>Finally, SCC welcomes the fact that “the Applicant anticipates that close future engagement will be facilitated by a Planning Performance Agreement (PPA)” [REP1-025] and looks forward to entering into discussions with the Applicant regarding the PPA.</p>
DC1.6.103	Suffolk CC Babergh DC Mid Suffolk DC	Why do you consider paragraph 3 (2) of Schedule 4 to be unreasonable? How does it need to be amended to address your concerns?	SCC (Legal) notes paragraph 3(2) of Schedule 4 has been omitted from dDCO dated 11 October 2023 which was submitted at Examination Deadline 2. SCC is content with this omission.
DC1.6.104	Local planning authorities	What fee should be levied by paragraph 3 (1) (b) of Schedule 4 of the dDCO?	SCC (Planning) understand that these are nominal amounts derived from TCPA fee regulations. SCC’s preference would be to negotiate a planning performance agreement for discharge of requirements, alongside facilitating future engagement as noted in reply to DC1.6.102. Subject to these negotiations, the local authorities will confirm their common position in respect of a reasonable fee.

Reference	Question to:	Question	Local Authority Answer
DC1.6.105	Suffolk CC Babergh DC Mid Suffolk DC	Can you provide suggested wording of the amendments to Articles, Requirements and Paragraph 1 of Schedule 4 that you refer to in paragraph 17.87 (a to j inclusive) of your joint LIR [REP1-045]?	<p><u>(a). the definition of “pre-commencement operations” and, in particular, the implications arising from certain works which are drafted as falling outside that definition;</u></p> <p>Certain of the carve-outs from the definition of “commencement” would seem capable of giving rise to significant environmental effects including: the demolition of existing buildings, site clearance, the provision of temporary accesses and the erection of any temporary means of enclosure.</p> <p>In paragraph 17.7 of the LIR [REP1-045] and Row (i) of the Comments [REP-013] SCC (Legal) states it would welcome “further explanation as to which of the carve-outs are <i>de minimus</i> and which have minimal potential for adverse impacts. SCC would also welcome an explanation of where each has been assessed”. SCC would still welcome that explanation and would propose to respond to that explanation in due course. The following comments are therefore subject to receiving the Applicant’s explanation.</p> <p>SCC (Legal) considers the provision of “temporary accesses” must either (i) be removed from the definition of “pre-commencement operations” or (ii) if retained, be limited to the provision of temporary accesses required to deliver the other pre-commencement operations and, if retained, the provision of “temporary accesses” must be subject to Requirement 11 (highway works).</p> <p>Option (i) would see the definition of “pre-commencement operations” amended as follows –</p> <p>“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 compounds, temporary accesses, erection of any temporary means of enclosure or temporary demarcation fencing marking out site boundaries and the temporary display of site notices or advertisements;”</p>

Reference	Question to:	Question	Local Authority Answer
			<p>Option (ii) would see the definition of “pre-commencement operations” amended as follows –</p> <p>“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 compounds, temporary accesses, erection of any temporary means of enclosure or temporary demarcation fencing marking out site boundaries, and the temporary display of site notices or advertisements, and, subject to Requirement 11 (highway works) the provision of temporary accesses necessary to deliver any of these pre-commencement operations ;”</p> <p>Option (ii) would also see Requirement 11 amended as follows –</p> <p>“11.—(1) 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.</p> <p>(2) The highway accesses must be constructed and reinstated in accordance with the details approved under sub-paragraph (1).</p> <p>(3) This requirement applies to the provision of any temporary access necessary to deliver any of the pre-commencement operations”.</p> <p><u>(b). the limits of deviation;</u> SCC is finalising the drafting of this provision which will provide for amending the Limits of Deviation for Work No.2 (which will affect the Hintlesham area) so that the pylon siting remains in the locations previously agreed with SCC and Historic England.</p> <p><u>(c). the way in which street works are controlled under article 11 (and under the corresponding requirement, Requirement 11);</u> <u>Article 11 (street works)</u></p>

Reference	Question to:	Question	Local Authority Answer
			<p><u>Article 11(2)</u> Under several of the draft DCO articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to say that approval must not be “unreasonably withheld or delayed” and there is also a provision that it is deemed to be given after a short period. In several cases this appears to be unprecedented in DCOs or not well preceded.</p> <p>SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to say that the approvals must not be “unreasonably withheld or delayed”. Moreover, by section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008, it is an offence for a person to fail to comply with the terms of a DCO. SCC considers it excessive for it to potentially face criminal liability in these circumstances.</p> <p>SCC notes from paragraph 3.15.1(c) of the Explanatory Memorandum [APP-035] that the cited precedent is article 11 of the Thames Tideway Tunnel DCO 2014 (S.I. 2014/2384), however the relevant provision in that Order (article 11(3)(b)) does not refer to consent not being delayed.</p> <p>In the light of the deeming provision in article 11(3), which makes the words “unreasonably withheld or delayed” unnecessary, SCC requests that article 11(2) is amended as follows –</p> <p style="padding-left: 40px;">“Without limiting the scope of the powers conferred by paragraph (1) but subject to the consent of the street authority, which consent shall not be unreasonably withheld or delayed, the undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits, for the purposes set out at sub-paragraph (1)(a) to (i) and paragraph (3) of article 8 (application of the 1990 Act) shall apply”.</p> <p>SCC requests that similar amendments are made to the following provisions: articles 14(4) (power to alter layout, etc. of streets), 15(5)(b) (temporary stopping up of streets and public rights of way), 16(1)(b) (access to works), 19(3) (discharge of water), and 47(2) (traffic regulation).</p> <p><u>Article 11(3)</u></p>

Reference	Question to:	Question	Local Authority Answer
			<p>By article 11(3), an application for consent under article 11(2) must be determined within 28 days of the application or consent is deemed to be granted. While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 28-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.</p> <p>Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision.</p> <p>SCC (Legal) requests that 28 days is replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 15(9) (temporary stopping up of streets and public rights of way); 16(2) (access to works); 19(9) (discharge of water); 21(8) (authority to survey and investigate land), 47(8) (traffic regulation) and 48(5) (felling or lopping) a deemed consenting regime.</p> <p>A similar point applies in respect of Schedule 4 (discharge of requirements), which is mentioned below.</p> <p>As explained in SCC’s Deadline 3 submission “Response to the Applicant’s Schedule of Changes to the draft Development Consent Order” SCC does not consider the Applicant’s proposed amendment to the article 11(3) in the latest version of the dDCO [REP2-005] achieves the Applicant’s aim and, in any event, maintains its position that 56 days is the appropriate timeframe. The same point applies to the Applicant’s proposed amendments to the following provisions in [REP2-005]: article 14(5), 15(9), 16(2), 19(9), 21(8), 47(8) and 48(5).</p> <p><u>(d). the proposals for stopping up streets and public rights of way under article 15:</u> Article 15 (temporary stopping up of streets and public rights of way) By article 15(1), the undertaker may, “for a reasonable time” divert traffic from the street or public right of way; and prevent all persons from passing along the street or PROW.</p>

Reference	Question to:	Question	Local Authority Answer
			<p>SCC would welcome more information as to what “a reasonable time” might be. In addition, SCC considers that article 15 should provide that any temporary diversion specified in column (4) of Part 1 of Schedule 7 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.</p> <p>Moreover, paragraph 3.19.5 of the Explanatory Memorandum [APP-035] states that any alternative route under this article should be provided on a like-for-like basis. Owing to this, SCC would suggest that article 15(6) be amended as follows –</p> <p style="padding-left: 40px;">“(6) Where the undertaker provides a temporary diversion under paragraph (4), the temporary alternative route is not required to be of a higher standard and must be of no lower standard than the temporarily closed street or public right of way in columns (1) and (2) of Parts 1 and 2 of Schedule 7 (streets or public rights of way to be temporarily stopped up)”.</p> <p>It would also be helpful to know how National Grid proposes (i) to inform SCC of any stopping up etc. and (ii) how it proposes to keep temporary working sites under paragraph (2) to a minimum in terms of time and area.</p> <p><u>(e). the proposals for constructing, altering and maintaining streets under article 17:</u></p> <p>Article 17 (construction, alteration and maintenance of streets)</p> <p>SCC (legal) requests that paragraphs (1) and (2) are amended as follows –</p> <p style="padding-left: 40px;">“(1) Any street (other than any private streets) to be constructed under this Order must be completed to the reasonable satisfaction of the street authority and must, unless otherwise agreed with the street authority, be maintained (including any culverts or other structures laid under that part of the highway) by and at the expense of the undertaker for a period of 12 months from its completion and at the expiry of that period by and at the expense of the street authority.</p> <p style="padding-left: 40px;">(2) Where a street is altered or diverted under this Order, the altered or diverted part of the street must be completed to the reasonable satisfaction of the street authority and must, unless otherwise agreed with the street authority, be maintained (including any culverts or other structures laid under that part of the highway) by and at the expense of the undertaker for a period of 12 months from its completion and at the expiry of that period by and at the expense of the street authority”.</p>

Reference	Question to:	Question	Local Authority Answer
			<p>SCC legal notes that the bold and underlined words are included in the cited precedent, article 12 of the Thames Tideway Tunnel DCO 2014 (S.I. 2014/2384). The SCC considers that commuted sums for future maintenance might also be required.</p> <p><u>(f). the proposals for regulating traffic under article 47;</u> <u>Article 47 (traffic regulation)</u> SCC requests that article 47(1) is amended as follows – “Subject to the provisions of this article, <u>and the consent of the traffic authority in whose area the road is situated,</u> the undertaker may, for the purposes of the construction of the authorised development ...”</p> <p>The precedent cited in paragraph 3.51.2 of the Explanatory Memorandum [APP035], (article 40 of the National Grid (Hinkley Point C Connection Project) Order 2016 (S.I.2016/49)), includes the bold and underlined words, as does the Network Rail (Norton Bridge Area Improvements) Order 2014 (S.I.2014/909; see article 38), which is cited in a footnote to paragraph 3.51.2. (The words are included in the corresponding provisions of other DCOs which are not cited in the Explanatory Memorandum).</p> <p>SCC requested that the same amendment be made to the final draft version of the Sizewell C (Nuclear Generating Station) Order 2022 (S.I.2022/853)) and, following the Examining Authority’s recommendation to include the words, they were included in the Order made by the Secretary of State.</p> <p>SCC is concerned that the consultation requirements under this article are insufficient and considers they should better reflect the consultation regime set out in regulation 6 of the Local Authorities’ Traffic Orders (Procedure) (England and Wales) Regulations 1996 which SCC would have to follow when making a TRO. SCC would welcome the Applicant’s explanation as to why this article departs so far from the 1996 Regulations. SCC would also like to know how any objections would be dealt with.</p> <p>For TROs in Schedule 12 which are modified or where new orders are required, SCC considers that, as a minimum, the consultation regime under regulation 6 of</p>

Reference	Question to:	Question	Local Authority Answer
			<p>the 1996 Regulations should apply. SCC also requests that its costs for the associated are recoverable.</p> <p>In addition, SCC would encourage the Applicant to follow SCC’s Consultation and Engagement Charter (which enshrines good practice) and would welcome discussions with the Applicant on this point.</p> <p>(g). the drafting of article 48, which concerns the felling or lopping of trees; SCC is finalising its proposed drafting of this article which will capture the following points –</p> <ul style="list-style-type: none"> • the deletion of “or near” from article 48(1) (as these words are too vague). • the article cross-referencing to a plan showing the location of all trees and hedgerows that will be affected by the works, along with timings of the proposed removal. (There needs to be an assessment procedure in place ahead of any tree or shrub works with respect to bats and nesting birds, and possibly dormice in relation to hedgerows). • a detailed compensation planting plan, showing how any tree and hedgerow lost will be compensated, either within, or close to, the Order limits. <p><u>(h). the identification of the discharging bod(ies) for Requirements;</u> SCC is content with the changes to paragraphs (1) and (3) of Requirement 4.</p> <p><u>(i). the drafting of certain requirements</u> <u>Paragraph 1 (interpretation)</u> Paragraph 1(4) states – “Where an approval or agreement is required under the terms of any Requirement or a document referred to in a Requirement, or any Requirement specifies “unless otherwise approved” or “unless otherwise agreed” by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given in relation to minor or immaterial changes and where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement”.</p> <p>No explanation for this provision is given in the Explanatory Memorandum [APP-035]. While it is precedented, the precedents usually include “does not” instead of “is unlikely to”. (See, for example, paragraph 1(3) of Schedule 2 (requirements) of</p>

Reference	Question to:	Question	Local Authority Answer
			<p>the Sizewell C (Nuclear Generating Station) Order 2022 (S.I.2022/853)). SCC considers “does not” should be included in paragraph 1(4) and, if the Applicant disagrees, SCC requests the Applicant provides an explanation.</p> <p><u>Requirement 4 (management plans)</u> Requirement 4(1) requires compliance with the specified management plans. SCC would support such a provision, in principle, provided that the content of the management plans was either (a) sufficiently detailed and precise at this stage so that they could be satisfied during the Examination process that the management plans would ensure that a satisfactory form of development would come forward (and that unsatisfactory ways of achieving the development were precluded) or (b) that the content of the management plans included explicit provision for the preparation of more detailed plans, which would be subject to a further approval process. However, as matters stand, the Applicant has structured the draft DCO so that there are ‘high level’ management plans that are to be certified documents but which are light on detail and leave too many matters at large and yet the draft DCO does not require any further approval process in relation to matters which are not satisfactorily specified in the management plans. SCC does not see this as acceptable and would ask the Applicant to review its approach in this regard.</p> <p><u>Requirement 5 (approval and implementation of Drainage Management Plan)</u></p> <p>Since highway authorities are responsible for, amongst other things, providing and managing highway drainage and roadside ditches, SCC considers the highway authority should grant the relevant drainage approvals under Requirement 5 and that the Requirement should be amended as follows –</p> <p>“5.—(1) No stage of the authorised development may be brought into operational use until, for that stage, a Drainage Management Plan (DMP), to address operational surface water management matters, has been submitted to and approved by the relevant planning highway authority.</p> <p>(2) The operational use of each stage of the authorised development must be carried out in accordance with the approved Drainage Management Plan (DMP) referred to in sub-paragraph (1) or with any amended Drainage Management Plan</p>

Reference	Question to:	Question	Local Authority Answer
			<p>(DMP) that may subsequently be approved by the relevant planning highway authority.”</p> <p><u>Requirement 6 (archaeology)</u> The justification for Requirement 6 is set out in paragraphs 8.45 to 8.52 of the LIR [REP1-045],</p> <p>SCC considers Requirement 6 should be drafted as follows –</p> <p>“(1) The authorised development must be undertaken in accordance with the Archaeological Framework Strategy and the Outline Written Scheme of Investigation (OWSI).</p> <p>(2) No stage of the authorised development may commence until either a Preservation in situ management plan, or a Detailed Written Scheme of Investigation of areas of archaeological interest relevant to that stage (if any) as identified within the OWSI or identified through evaluation work as set out in the OWSI has been submitted to and approved by Suffolk County Council.</p> <p>(3) Any Detailed Written Scheme of Investigations must be in accordance with the OWSI and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found. Any Detailed Written Scheme of Investigation must include:</p> <ul style="list-style-type: none"> (a) an assessment of significance and research questions (b) the programme of methodology of site investigation and recording (c) the programme for post-investigation assessment (d) provision to be made for analysis of the site investigation and recording (e) provision to be made for archive deposition of the analysis and records of the site investigation (f) nomination of a competent person or persons/organisation to undertake the works set out within the Detailed Written Scheme of Investigation (g) an implementation timetable.

Reference	Question to:	Question	Local Authority Answer
			<p>(4) Any archaeological works must be carried out in accordance with the approved Detailed Written Scheme of Investigation for that stage.</p> <p>(5) No later than three years from commencement of the authorised development, post-investigation assessment must be completed for all stages in accordance with the programme set out in the OWSI and the Detailed Written Schemes of Investigation, and provision made for analysis, publication and dissemination of results and archive deposition secured in accordance with a scheme-wide Updated Project Design and timetable that has been submitted to and approved by Suffolk County Council.”</p> <p>It will be noted that this version of Requirement 6 is slightly different from the version included in the LIR: in paragraphs (2) and (5), references to “relevant planning authority” have been replaced with “Suffolk County Council”. This is an appropriate change because SCC is responsible for archaeological services in Suffolk.</p> <p>Requirement 7 (construction hours) <u>Paragraph 1: the core hours</u> Paragraph (1) of Requirement 7 states –</p> <p>“Subject to sub-paragraphs (2) and (3), work may only take place between 0700 and 1900 Monday to Friday and between 0800 and 1700 on Saturdays, Sundays and Bank Holidays (the core working hours), unless otherwise approved by the relevant planning authority”.</p> <p>While these core hours are included in other National Grid DCOs (for instance, Requirement 7 of both the National Grid (Richborough Connection Project) Development Consent Order 2017 (S.I.2017/817) and the National Grid (Hinkley Point C Connection Project) Order 2016 (S.I.2017/49)) no justification for their duration is provided in the Explanatory Memorandum [APP-035], which simply states: “Core construction hours are included at sub-paragraph (1)”.</p> <p>This approach is inconsistent with that required in Advice Note 15, which states –</p> <p>“If a draft DCO includes wording derived from other made DCOs, this should be explained in the Explanatory Memorandum. The Explanatory Memorandum should explain why that particular wording is relevant to the proposed draft DCO ... the</p>

Reference	Question to:	Question	Local Authority Answer
			<p>ExA and Secretary of State will need to understand why [the wording] is appropriate for the scheme applied for”. [Paragraph 1.5].</p> <p>Owing to the lack of information in the Explanatory Memorandum, it is difficult for SCC to understand why these core hours have been chosen for this project.</p> <p>While SCC would prefer the weekday core hours to end at 1800 rather than 1900 (it will be remembered that, by Requirement 7(3), the core hours exclude start up and close down activities up to 1 hour either side of the core working hours, meaning activities could end at 2000), SCC is particularly concerned by the duration of core hours for weekends and Bank Holidays and their impact on public amenity and tourism. For instance, there are numerous residential and tourist facilities along the project route, including Polstead Heath village near to the Sealing End compound and Hintlesham Hall, which is a well-known wedding venue.</p> <p>In the light of its concerns, SCC considers Saturday hours should be between 0800 and 1300 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S.I.2022/432). Requirement 24 of that Order states the core hours are “between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays”, subject to certain exceptions listed in sub-paragraph (2).</p> <p>Absent justification from the Applicant – which takes account of the SCC’s concerns – for (i) the need for Sunday and Bank Holiday working on this project and (ii) for weekend working to end at 1700, rather than at 1300, SCC considers paragraph (1) should be amended as follows –</p> <p style="padding-left: 40px;">“Subject to sub-paragraphs (2) and (3), work may only take place between 0700 and 1900 Monday to Friday and between 0800 and 1700 1300 on Saturdays, with no activity on Sundays and or Bank Holidays (the core working hours), unless otherwise approved by the relevant planning authority”.</p> <p style="padding-left: 40px;">[Deletions shown struck-through; amendments in bold].</p> <p>While the hours are shorter than sought by the Applicant, amended paragraph (1) would still allow the SCC to approve departures from the core hours, providing flexibility in the event it is required.</p>

Reference	Question to:	Question	Local Authority Answer
			<p><u>Paragraph 2: exceptions to the core hours</u> Paragraph (2) of Requirement 7 lists 10 operations which may take place outside the core working hours referred to in paragraph (1). While paragraph 4.3.22 of the Explanatory Memorandum states "...sub-paragraph (2) lists a number of activities which are not subject to the core working hours", it does not explain why each operation should be able to take place outside of core hours for this project.</p> <p>It is noted the list of operations is longer than in the equivalent provision of the Richborough and Hinkley Point C Connection Project Orders mentioned above.</p> <p>SCC would again welcome an explanation of why the operations should be able to take place outside the already extensive core hours. SCC does not consider an explanation is required in respect of exception (h): "activity necessary in the instance of an emergency where there is a risk to persons or property".</p> <p><u>Requirement 10 (implementation and maintenance of reinstatement planting scheme)</u> Paragraph (3) states – "Any trees or hedgerows planted as part of an approved reinstatement planting scheme that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority". The reference to "5 years" should be changed to "10 years", which would provide greater ecological improvements.</p> <p><u>(j). in Schedule 4, the timeframes for determining applications by SCC after consent is granted need to be extended and the fees proposed for determining application are woefully low and need to be increased.</u> Please see the reply to DC1.6.102.</p>
DC1.6.106	The Applicant		
DC1.6.107	The Applicant		
DC1.6.108	The Applicant		

Reference	Question to:	Question	Local Authority Answer
DC1.6.109	The Applicant		
DC1.6.110	The Applicant		
DC1.6.111	The Applicant		
DC1.6.112	The Applicant		
DC1.6.113	The Applicant		
DC1.6.114	The Applicant		
DC1.6.115	The Applicant		
DC1.6.116	The Applicant		
DC1.6.117	Natural England		
DC1.6.118	The Applicant		
DC1.6.119	Suffolk CC Babergh DC Mid Suffolk DC	At paragraph 12.11 of your LIR [REP1-45] you refer to the need for a Requirement to address decommissioning and removal route; can you suggest the wording that you would like to see included within the DCO?	<p>SCC (Local Highway Authority) noted that the requirement is included in the granted order for East Anglia One North Offshore Wind Farm Order 2022 could form the basis of a similar requirement for this project. An extract is provided below:</p> <p><i>Onshore decommissioning</i></p> <p>30.—(1) The undertaker must notify the relevant planning authority of the permanent cessation of commercial operation of the transmission works within 14 days following the date of permanent cessation.</p> <p>(2) Within six months following the permanent cessation of commercial operation of the transmission works an onshore decommissioning plan in respect of the transmission works must be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority and the relevant statutory nature conservation body.</p> <p>(3) The undertaker must notify the relevant planning authority of the permanent cessation of commercial operation of the grid connection works within 14 days following the date of permanent cessation.</p> <p>(4) Within six months following the permanent cessation of commercial operation of the grid connection works an onshore decommissioning plan in respect of the</p>

Reference	Question to:	Question	Local Authority Answer
			grid connection works must be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority and the relevant statutory nature conservation body. (5) The decommissioning plans must be implemented as approved.
DC1.6.120	The Applicant Environment Agency		
7. Good design			
GD1.7.1	The Applicant Essex CC Braintree DC		
GD1.7.2	The Applicant		
GD1.7.3	The Applicant		
GD1.7.4	The Applicant		
8. Historic environment			
HE1.8.1	Historic England Babergh DC Mid Suffolk DC Suffolk CC	Are you content with the study areas used for the historic environment baseline studies (paragraph 8.4.5 ff, ES Chapter 8 [APP-076])?	SCC (Archaeological Service) is content with the baseline for archaeology as set out in 8.4.7 – 8.4.9. For built and designated heritage, however, SCCAS would defer to Historic England and BMSDC.
HE1.8.2	Historic England Babergh DC Mid Suffolk DC Suffolk CC	The assessment of effects on settings in ES Chapter 8 [APP-076] (paragraphs 8.1.6, 8.4.11, 8.4.17, 8.4.22, etc) seems to rely on intervisibility between the Proposed Development and potential historic environment receptors. Do you	SCC (Archaeological Service) notes that this relates to setting regarding built and designated heritage, on matters such as this, SCCAS would defer to Historic England and BMSDC.

Reference	Question to:	Question	Local Authority Answer
		understand that to be the case, and, if so, are you content with the approach?	
HE1.8.3	Historic England		
HE1.8.4	The Applicant		
HE1.8.5	Braintree DC Essex CC		
HE1.8.6	The Applicant		
HE1.8.7	The Applicant		
HE1.8.8	The Applicant		
HE1.8.9	Historic England Babergh DC Mid Suffolk DC Suffolk CC The Suffolk Preservation Society	<p>A number of parties have raised issues in relation to effects on the Grade I listed Hintlesham Hall and the associated listed buildings. The Applicant's proposals here are said to be based on the micrositing of towers agreed with Historic England prior to the project being put on hold in 2013, but the proposed Limits of Deviation proposed would allow pylons to vary from the indicative agreed positions.</p> <p>Do you consider this approach acceptable in the area within the setting of Hintlesham Hall?</p> <p>Are there any implications in relation to avoidable harm to Hintlesham Hall?</p> <p>Can you confirm if there is a specific area, component or extent of the proposed Limits of Deviation that is of concern, and any harm you consider could arise.</p>	<p>SCC (Archaeological Service) notes that this concerns impacts regarding Hintlesham Hall. SCCAS would therefore defer to Historic England, BMSDC and the Suffolk Preservation Society.</p> <p>SCC (Landscape) has expressed concerns about the proposed Limits of Deviation within the Relevant Representations ([RR-006], paragraphs h) and v)) and the LIR [REP1-045], paragraphs 6.9 - 6.11, 6.47.b, 17.9. The principal concern is to ensure that the tower locations agreed in 2013 are recognised, and that any changes to that arrangement are adequately and effectively controlled.</p> <p>The specific heritage impacts of individual tower locations, or the heritage effects of changes to the location of individual towers adjacent to, or within sight of, Hintlesham Hall are a matter for the relevant heritage specialists at BMSDC and Historic England.</p>

Reference	Question to:	Question	Local Authority Answer
		<p>Should any changes or deviation be restricted to those agreed by the relevant local planning authority and Historic England?</p> <p>Paragraph 8.11.6 of the ES [APP-076] addresses the sensitivity testing that was carried out in relation to pylon locations and alignment and concludes that, <i>'the pylons could be located anywhere within the parameters of the LoD (including the vertical LoD) without resulting in significant effects to heritage assets.'</i> Do you agree with this conclusion?</p> <p>Is the sensitivity testing and conclusion further described in the Applicant's Hintlesham Hall Assessment [APP-128] sufficiently evidenced, and do you agree with the conclusion?</p>	
HE1.8.10	The Applicant Historic England Babergh DC Mid Suffolk DC Suffolk CC The Suffolk Preservation Society	Noting that nearby locations and slightly different angles of view might introduce one or more of the proposed new pylons into the visualisation in addition to the new overhead lines, is the location of viewpoint HV01 [APP-063] reasonably representative of the full range of potential impacts on the listed buildings at the Hintlesham Hall estate, including their setting? On this basis, is the assessment set out in the Hintlesham Hall Assessment [APP-128] a reasonable worst case?	SCC (Archaeological Service) notes that this concerns viewpoint HV01 and setting of Hintlesham Hall. SCCAS would therefore defer comment to Historic England, BMSDC and the Suffolk Preservation Society.
HE1.8.11	The Applicant		
HE1.8.12	The Applicant		

Reference	Question to:	Question	Local Authority Answer
HE1.8.13	The Applicant		
HE1.8.14	The Applicant		
HE1.8.15	The Applicant Historic England		
9. Landscape and views, including trees and hedgerows			
AONB			
LV1.9.1	Natural England Local planning authorities Dedham Vale AONB and Stour Valley Partnership The PCs of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead and Stoke by Nayland	Having seen the information from the Applicant in ES Appendix 6.2 Annex A, Dedham Vale AONB Approach and Identification of Setting Study [APP-099], and its comments on RRs (e.g., section 2.12, section 2.13, page 64, section 3.9, page 113) [REP1-025], explain any outstanding concerns that you may have in relation to the Applicant's definition of, and assessment of impacts on the setting of the Dedham Vale AONB.	SCC (Planning) has seen the proposed response to this question by the Dedham Vale AONB and Stour Valley Partnership and agrees with that response. To avoid unnecessary duplication that response is not repeated here. SCC (Landscape) notes that the setting of protected landscapes is an important matter, which Natural England is best placed to provide advice on.
LV1.9.2	The PCs of Assington, Bures St Mary, Leavenheath,		

Reference	Question to:	Question	Local Authority Answer
	Little Cornard, Polstead and Stoke by Nayland		
LV1.9.3	Dedham Vale AONB and Stour Valley Partnership	Your RR [RR-028] raised the matter of how the Proposed Development would impact on the ability to deliver the AONB's statutory purpose, without further detail. Having seen the Applicant's comments on your RR [REP1-025], can you elaborate on any outstanding concerns in relation to this?	<p>SCC (Planning) has seen the proposed response to this question by the Dedham Vale AONB and Stour Valley Partnership and agrees with that response. To avoid unnecessary duplication that response is not repeated here.</p> <p>SCC (Landscape) particularly agrees, that, within the areas affected by the proposed development, the statutory purpose of the AONB (to conserve and enhance natural beauty) would not be able to be delivered during the construction period.</p>
LV1.9.4	Natural England Local planning authorities Dedham Vale AONB and Stour Valley Partnership	Having seen the Applicant's comments on RRs [REP1-025] (e.g., page 113 ff) and its document, The Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032], do you believe that any further information is required to assess the Proposed Development's effects on the special qualities of the AONB? Do you agree with the Applicant's conclusions in this regard, and, if not, why not?	<p>SCC (Planning) has seen the proposed response to this question by the Dedham Vale AONB and Stour Valley Partnership and agrees with that response. To avoid unnecessary duplication that response is not repeated here.</p> <p>SCC (Landscape) agrees with the applicant's findings in the ES that: <i>"Significant adverse landscape effects during construction are predicted for the AONB and Stour Valley SLA, however only a localised part of the designation within approximately 1km of the LoD would be affected"</i> ([APP-098], Document 6.3.6.2: ES Appendix 6.2 Assessment of Effects on Designated Landscapes, April 2023, paragraph 4.1.1). See also SCC comments on this relation to socio economics (LIR [REP1-045], paragraph 15.48 – 15.50).</p> <p>SCC (Landscape) considers, however, that the presence of these significant adverse landscape effects within part the AONB during construction, will also tend to undermine the purposes of the designation as a whole during construction, and in that respect, SCC supports the view of the Dedham Vale AONB and Stour Valley Partnership that the adverse effects would affect the AONB as a whole (as raised in the AONB's Answers to ExQ1).</p>
LV1.9.5	The Applicant		

Reference	Question to:	Question	Local Authority Answer
	Dedham Vale AONB and Stour Valley Partnership		
LV1.9.6	Natural England Local planning authorities Dedham Vale AONB and Stour Valley Partnership	Do you consider that the information submitted by the Applicant in its comments on RRs [REP1-025] (e.g., page 92 and page 113 ff) is sufficient to conclude that the Applicant properly addressed its duty of regard to the purpose of the AONB as described in section 85 of the Countryside and Rights of Way Act (2000)? If not, why not?	<p>SCC (Planning) has seen the proposed response to this question by the Dedham Vale AONB and Stour Valley Partnership and agrees with that response. To avoid unnecessary duplication that response is not repeated here.</p> <p>SCC (Landscape) is satisfied that the applicant has sufficiently addressed its duty of regard to the purposes of the AONB, but endorses the concerns expressed by the Dedham Vale AONB and Stour Valley Partnership (as raised in the AONB's Answers to ExQ1).</p>
Visual assessment			
LV1.9.7	The Applicant		
LV1.9.8	The Applicant		
LV1.9.9	The Applicant		
LV1.9.10	The Applicant		
LV1.9.11	The Applicant		
LV1.9.12	The Applicant		
LV1.9.13	The Applicant		
LV1.9.14	The Applicant		
LV1.9.15	The Applicant		
LV1.9.16	Suffolk CC	Your suggested locations for site inspections [PDA-007] includes VP AB2.19 (location 2). Is this an incorrect reference as it could not be located in the application documentation?	<p>SCC (Landscape) viewpoint AB2.19 is indeed erroneous.</p> <p>Further, the listings of viewpoints of potential interest for a site visit were intended as additions to the suggested locations, rather than as identification for the</p>

Reference	Question to:	Question	Local Authority Answer
			<p>locations (some suggested locations are not supported by viewpoint assessments).</p> <p>For clarity, the suggested locations of potential interest for observations, listed her per Viewpoint Location Map include:</p> <p>Section AB: Bramford/Hintlesham [APP-101]</p> <ul style="list-style-type: none"> - View from Tye Lane and from the top half of The Channel, facing southeast towards Bramford, to perceive the impacts of the new pylons connecting into Bramford Substation on the landscape ([PDA-007], paragraph 7.14) and the need for additional mitigative planting. - Public Right of Way to the north-western edge of Burstall (near VP AB03), VP AB03 and around Walnut Tree Farm. Burstall will experience significant cumulative effects if the Norwich to Tilbury application comes forward as anticipated; with regard to Bramford to Twinstead mitigative planting would be beneficial ([PDA-007], paragraph 7.15). - Views from Hintlesham Hall and the grounds of the Hall to the north and looking back to Bramford substation; and the view north from A1071, (west of Hintlesham Hall) ([PDA-007], paragraph 7.16). <p>Section C: Brett Valley [APP-102]</p> <ul style="list-style-type: none"> - Around the Benton End Farmhouse, Overbury Hall at Hadleigh and the View from the PROW near Ashbrook House, in the Brett Valley (VP C01). The area has large cultural associations with Suffolk artists alongside the heritage of these Listed Buildings. This location should be perceived to appreciate the condition and sensitivity of the landscape. An area for potential landscape restoration ([PDA-007], paragraph 7.17). <p>Section D: Polstead [APP-103]</p> <ul style="list-style-type: none"> - View of the Dedham Vale East Cable Sealing End compound at Polstead Heath (near VP D04). Observations should include proximity to Polstead Heath and the siting of the compound in the fields ([PDA-007], paragraph 7.18). <p>Section E: Dedham Vale AONB [APP-104]</p> <ul style="list-style-type: none"> - The location, where the undergrounding corridor crosses the Box Valley to gain an understanding of the site conditions/constraints for temporary

Reference	Question to:	Question	Local Authority Answer
			<p>works required to cross the valley, such as the temporary bridge. In addition, VP E06 in the valley and, more importantly EO07 looking across the AONB; these locations should provide an appreciation of the nature of the valley and its sensitivity ([PDA-007], paragraph 7.19).</p> <p>Section F: Leavenheath/Assington [APP-105]</p> <ul style="list-style-type: none"> - View of Stour Valley East Cable Sealing End Compound at Leavenheath from B1068 (near VP F01) ([PDA-007], paragraph 7.20), considering mitigation planting. - In Assington, the footpath to the north of the water tower, from and south of VP F2.14, and viewpoints of the Assington Neighbourhood Plan Protected Views (6, 12, 13, 15, 16). SCC (Landscape) advises that this location requires additional mitigation, specifically the vegetation along the footpath could be strengthened to filter the views ([PDA-007], paragraph 7.21). <p>Section G: Stour Valley [APP-106]</p> <ul style="list-style-type: none"> - Visit to location of the Stour Valley East Cable Sealing End Compound at Workhouse Green and to Dorking Tye (around VP G01) ([PDA-007], paragraph 7.22) to perceive the conditions and constraints in this area. - Views of the Stour Valley, along Bures Road (B1508) at bus layby on Spouts Lane and Corner Twinstead Road / Moat Lane (588010, 236455 roughly) where St Edmund Way passes. Due to its high elevation and opening in the roadside vegetation, the latter location provides a good view into the valley and an appreciation of the overall scheme and surrounding landscape ([PDA-007], paragraph 7.23). - View of the Stour Valley West Cable Sealing End Compound at Alphamstone (VP G07) ([PDA-007], paragraph 7.24). SCC advises that this location requires additional mitigation. - View from A131 at Wickham St Paul where the A131 passes Butler’s Wood Grid Supply Point Substation (VP G18), facing east, viewing existing pylons. If this location is effectively screened then SCC does not anticipate adverse impacts, however, SCC notes that mounding is proposed in this location ([PDA-007], paragraph 7.25).
LV1.9.17	The Applicant	Suffolk CC [PDA-007] believes there is an omission on Photomontages 34A	In the LIR [REP1-045], paragraphs 6.144 and 6.145, SCC (Landscape) refers to the label on the Vegetation Reinstatement Plan [APP-184], Sheet 28, stating: EM-

Reference	Question to:	Question	Local Authority Answer
	Suffolk CC	and 34B [APP-065] (which display VP G07 in year 1 and year 15), in that no mitigation planting is shown in year 15 whereas ES Appendix 6.4, Viewpoint Assessment Section G Part 6 [APP-106], notes that year 15 would include mitigation. What is the situation with this?	<p><i>G06: The design allows for an area of landscape planting around the CSE compound at Stour Valley West. The embedded planting will be maintained for the life of the CSE compound.</i></p> <p>It is acknowledged that some planting is shown on photomontages 34A and 34B [APP-065]. ES Appendix 6.4, Viewpoint Assessment Section G Part 6 [APP-106] speaks of reinstatement planting.</p> <p>As the photomontages demonstrate, the proposed planting, be it re-instatement, mitigative or for Biodiversity/Environmental Gain, is not sufficient to screen, filter or soften the stark appearance of the gantries of the CSE compound from VP G07. SCC (Landscape) does not agree that the existing woodland backdrop makes the proposed infrastructure less prominent ([APP-106], p.26, comments for Operation- Year 1 (Without Mitigation)).</p> <p>SCC (Landscape) considers that substantial further mitigation planting is required for this location.</p> <p>SCC's view, the lack of screen planting cannot be justified by the location of the underground cables.</p>
LV1.9.18	The Applicant		
LV1.9.19	Braintree DC Essex CC		
LV1.9.20	The Applicant		
LV1.9.21	The Applicant		
LV1.9.22	Braintree DC Essex CC		
LV1.9.23	The Applicant		
LV1.9.24	The Applicant		
LV1.9.25	The Applicant		

Reference	Question to:	Question	Local Authority Answer
LV1.9.26	The Applicant		
LV1.9.27	The Applicant		
General LVIA matters			
LV1.9.28	Natural England		
LV1.9.29	The Applicant Natural England Local planning authorities	The assessment is said to be based on GLVIA3 (ES Chapter 6 paragraph 6.4.11 [APP-074].) The Landscape Institute produced a consultation version of Draft Technical Guidance Note 05/23, <i>Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3)</i> , in July 2023. Noting this remains as a draft, do any of the contents have any relevance to, or change the outcome of the LVIA set out in the ES?	SCC (Landscape) considers that the late appearance of this draft guidance means that it would not be reasonable to revise the LVIA methodology and findings to accommodate it.
LV1.9.30	The Applicant		
LV1.9.31	The Applicant		
LV1.9.32	The Applicant		
LV1.9.33	The Applicant		
LV1.9.34	The Applicant		
LV1.9.35	The Applicant		
LV1.9.36	The Applicant		
LV1.9.37	The Applicant		
LV1.9.38	The Applicant		
LV1.9.39	The Applicant		

Reference	Question to:	Question	Local Authority Answer
LV1.9.40	The Applicant Local planning authorities	In the Planting Schedule [APP-185], do you consider the inclusion of <i>Alnus glutinosa</i> (alder) in the H2 species-rich hedgerow mix with trees appropriate? Is alder die-back prevalent in the area, and - if so - should the planting of new alder trees be restricted?	SCC (Landscape) acknowledges that species choice is challenging, given the range of diseases at present. It would therefore be preferable to finalise the detailed suite of species at the Discharge of Requirements stage to be able to take account of the prevailing disease issues and availability of planting stock at the time.
Hedgerows and trees			
LV1.9.41	The Applicant		
LV1.9.42	The Applicant		
LV1.9.43	The Applicant		
LV1.9.44	The Applicant		
LV1.9.45	The Applicant		
LV1.9.46	The Applicant		
LV1.9.47	The Applicant		
LV1.9.48	The Applicant		
LV1.9.49	The Applicant		
10. Land use and soil			
Agriculture and other land use			
LU1.10.1	The Applicant		
LU1.10.2	The Applicant		
LU1.10.3	The Applicant		
LU1.10.4	The Applicant		
LU1.10.5	The Applicant		
LU1.10.6	The Applicant		

Reference	Question to:	Question	Local Authority Answer
LU1.10.7	The Applicant		
LU1.10.8	The Applicant		
LU1.10.9	The Applicant		
LU1.10.10	The Applicant		
LU1.10.11	The Applicant		
LU1.10.12	The Applicant		
LU1.10.13	The Applicant		
LU1.10.14	Local planning authorities Natural England	Should a Soil Management Plan or Outline Soil Management Plan be produced and secured through Requirement 4 of the dDCO?	SCC (Planning) believes that only if appropriate soil handling methods are employed would the proposed development be acceptable in respect of the potential impacts upon soil resources including the Best & Most Versatile agricultural land. Whilst SCC has no strong views on the most appropriate way to achieve that outcome, it welcomes the suggestion that an Outline Soil Management Plan should be required pre-consent, which should be followed in due course by the submission and approval of a more detailed plan post-consent.
LU1.10.15	Suffolk CC Babergh DC Mid Suffolk DC	Paragraph 10.2 of the Suffolk councils' LIR [REP1-045] refers to temporary use of the Layham Quarry plant site as a construction laydown area. It is unclear if this reference is to an area proposed by the Applicant or to an alternative area proposed by the Councils. Please provide further information to identify this construction laydown area, including reference to documents in the Examination Library as necessary.	SCC (Planning) suggested during the pre-application phase that the quarry would potentially provide a suitable area for construction laydown and access due in part to the established purpose-built, access road (Rands Road) to the A1071. The quarry is also dormant at present, and includes an existing weighbridge, buildings and a minerals processing area, together with the availability of water and electrical power. The contact details of the minerals operator Brett Aggregates were also provided to NGET. The site in questions is shown with the application document as a temporary access: [APP-018] (Document 2.10 General Arrangement Plans, Final Issue A) on Sheet 11.
LU1.10.16	The Applicant		
LU1.10.17	Suffolk CC Babergh DC	Paragraph 10.3 of the Suffolk councils' LIR [REP1-045] refers to extraction of minerals on site during the course of construction. At ISH1, the Applicant	SCC (Planning) confirms that it does not see the interaction of the proposals as part of the proposed development with underlying minerals resources as minerals extraction. Nevertheless, if minerals resources are displaced by the development, their use within the construction of the proposed development is supported.

Reference	Question to:	Question	Local Authority Answer
	Mid Suffolk DC	confirmed that any consent would not authorise this activity. Please clarify if you perceive the extraction of minerals on site during the course of construction forms part of the authorised development.	
LU1.10.18	The Applicant		
LU1.10.19	The Applicant		
LU1.10.20	The Applicant		
Soils, geology and ground conditions			
LU1.10.21	The Applicant		
LU1.10.22	The Applicant		
LU1.10.23	The Applicant		
LU1.10.24	The Applicant		
LU1.10.25	The Applicant		
LU1.10.26	The Applicant		
LU1.10.27	The Applicant		
LU1.10.28	The Applicant		
LU1.10.29	The Applicant		
LU1.10.30	The Applicant		
LU1.10.31	The Applicant		
11. Noise and vibration			
NV1.11.1	The Applicant		
NV1.11.2	The Applicant		
NV1.11.3	The Applicant		

Reference	Question to:	Question	Local Authority Answer
NV1.11.4	The Applicant		
NV1.11.5	The Applicant		
NV1.11.6	The Applicant		
NV1.11.7	The Applicant		
NV1.11.8	The Applicant Local planning authorities	Would a Noise and Vibration Management Plan (NaVMP) be useful to bring together and secure all of the relevant controls and mitigation measures? If so, should it be secured through Requirement 4 of the dDCO?	SCC (Planning / Public Health) would support such a proposal.
NV1.11.9	The Applicant		
NV1.11.10	The Applicant		
NV1.11.11	The Applicant		
NV1.11.12	The Applicant		
NV1.11.13	The Applicant		
NV1.11.14	The Applicant		
NV1.11.15	The Applicant		
12. The water environment			
Flood Risk Assessment			
WE1.12.1	The Environment Agency River Stour Trust Lead Local Flood Authorities	Can you briefly confirm your views on the applicant's approach and method in the Flood Risk Assessment [APP-059]? Do you consider the Flood Risk Assessment to comply with NPS EN-1, the National Planning Policy	SCC (LLFA) considers that the Applicant has taken a pragmatic approach to assessing flood risk on this project. Regarding compliance with NPS EN-1, NPPF, and PPG, SCC (LLFA) notes that because some flood risks have been scoped out, the Flood Risk Assessment does not comply with the national policies and guidance outlined.

Reference	Question to:	Question	Local Authority Answer
		<p>Framework and Planning Practice Guidance?</p> <p>Does the Flood Risk Assessment represent an accurate assessment of the flood risks on site and is the assessment proportionate to the risk and appropriate to the scale and nature of the project?</p>	<p>However, SCC (LFFA) considers that the Flood Risk Assessment does represent an accurate and proportionate assessment.</p>
WE1.12.2	<p>The Environment Agency River Stour Trust Lead Local Flood Authorities</p>	<p>Are you content with the Applicant's approach to the operational phase risk assessment, as set out in paragraphs 4.3.13 and 4.3.14 of the Flood Risk Assessment [APP-059]?</p>	<p>SCC (LLFA) is content.</p>
WE1.12.3	<p>Lead Local Flood Authority</p>	<p>Does the Flood Risk Assessment [APP-059] adequately and appropriately cover the specific issues of concern to the Lead Local Flood Authority?</p>	<p>SCC (LLFA) is content that this is adequately covered.</p>
WE1.12.4	<p>The Environment Agency River Stour Trust Lead Local Flood Authorities</p>	<p>Can you briefly confirm your views on the sufficiency and application of the sequential and exception tests set out in the Flood Risk Assessment [APP-059]?</p>	<p>SCC (LLFA) considers that this is not a matter for the LLFA to comment on.</p>
WE1.12.5	<p>The Applicant</p>		
WE1.12.6	<p>The Applicant</p>		
WE1.12.7	<p>The Applicant</p>		

Reference	Question to:	Question	Local Authority Answer
WE1.12.8	The Applicant		
WE1.12.9	The Applicant		
WE1.12.10	The Applicant		
Surface water management			
WE1.12.11	The Applicant		
Management measures			
WE1.12.12	Environment Agency River Stour Trust Lead Local Flood Authorities	What are your views on the management measures set out in Section 9.2 (Management Measures) of the CEMP [APP-177] regarding: (i) site planning and preparation; (ii) surface water abstraction and discharges; (iii) pollution and erosion management measures; and (iv) reinstatement?	SCC (LLFA) can confirm that the measures are in line with best practice for a construction site.
WE1.12.13	Environment Agency River Stour Trust Lead Local Flood Authorities	What are your views on the capacity of the control measures set out in CoCP [APP-178] and REAC [APP-179] to manage flood risk?	SCC (LLFA) can confirm that the measures are in line with best practice for a construction site.
WE1.12.14	Environment Agency River Stour Trust Lead Local Flood Authorities	Would the dDCO [APP-034] and Section 9.2 (Management Measures) of the CEMP [APP-177] adequately secure all measures required to mitigate flood risk?	SCC (LLFA) can confirm that the measures are in line with best practice for a construction site.

Reference	Question to:	Question	Local Authority Answer
WE1.12.15	Environment Agency		
WE1.12.16	The Applicant		
WE1.12.17	The Applicant		
WE1.12.18	The Applicant		
WE1.12.19	Environment Agency		
WE1.12.20	The Applicant		
WE1.12.21	The Applicant		
WE1.12.22	The Applicant		
WE1.12.23	The Applicant		
WE1.12.24	The Applicant		
WE1.12.25	The Applicant		
WE1.12.26	The Applicant		
WE1.12.27	The Applicant		
WE1.12.28	The Applicant		
WE1.12.29	The Applicant		
WE1.12.30	The Applicant		
WE1.12.31	The Applicant		
WE1.12.32	The Applicant		
WE1.12.33	The Applicant		
WE1.12.34	The Applicant		
WE1.12.35	The Applicant		
WE1.12.36	The Applicant		

Reference	Question to:	Question	Local Authority Answer
WE1.12.37	The Applicant		
WE1.12.38	The Applicant		
WE1.12.39	The Applicant		
Temporary bridges and culverts			
WE1.12.40	Environment Agency		
WE1.12.41	The Applicant Environment Agency		
WE1.12.42	The Applicant		
WE1.12.43	The Applicant Environment Agency		
WE1.12.44	The Applicant		
Water resources			
WE1.12.45	The Applicant		
WE1.12.46	The Applicant		
13. Traffic and transport			
Transport assessment			
TT1.13.1	The Applicant		
TT1.13.2	The Applicant		
TT1.13.3	The Applicant		
TT1.13.4	The Applicant		
TT1.13.5	The Applicant		

Reference	Question to:	Question	Local Authority Answer
TT1.13.6	The Applicant		
TT1.13.7	The Applicant		
TT1.13.8	The Applicant		
TT1.13.9	The Applicant		
TT1.13.10	The Applicant		
TT1.13.11	The Applicant		
TT1.13.12	The Applicant		
TT1.13.13	The Applicant		
TT1.13.14	The Applicant		
TT1.13.15	The Applicant National Highways Essex CC Suffolk CC	Does the Transport Assessment [APP-061] submitted with the application meet the criteria set out in NPS EN-1, Section 5.14 Traffic and Transport, in relation to the requirements of a Transport Assessment? If not, in what respects is it lacking?	<p>SCC (Local Highway Authority) accepts that the location and nature of the site makes it difficult to prepare a travel plan that can improve access by sustainable means of transport (5.14.7 of NPS EN-1) although this does not mean efforts should be made to do so such as use of minibuses. Therefore, provision of waking and cycling routes is unlikely to be beneficial in terms of benefit versus disruption during construction. The exception may be where focussed improvements can be made to avoid specific impacts such as PROW or footways crossing busy roads or where there are safety issues such as narrow roads or bends.</p> <p>Similarly, it is unlikely that improvements to the internal transport impact can be delivered that shifts freight to a more sustainable mode of transport (5.14.12).</p> <p>SCC (Local Highway Authority)'s position is that HGV movements should be controlled as stated within the LIR paragraph 12.79 [REP1-045].</p> <p>SCC is concerned that the 'water preferred policy' (5.14.16) is not being rigorously followed in respect of some AILs such as cable drums which may come from ports further away than Ipswich or Felixstowe.</p>
TT1.13.16	The Applicant		

Reference	Question to:	Question	Local Authority Answer
TT1.13.17	The Applicant		
Construction traffic and construction route strategy			
TT1.13.18	The Applicant		
TT1.13.19	The Applicant		
TT1.13.20	The Applicant		
TT1.13.21	The Applicant National Highways Essex CC Suffolk CC	Has agreement been reached with the highway authorities on a monitoring and enforcement strategy for construction and related traffic [sections 8.2 and 8.3 of the CTMP [APP-180] refer)? If not, what are the outstanding issues?	As SCC (Local Highway Authority) understands that there has been no change in the Applicant's position since the application and therefore the issues raised regarding monitoring and enforcement remain. SCC looks forward to these being resolved in a revised CTMP. Such key issues are considered to be: <ul style="list-style-type: none"> • HGV routes and timing • Daily HGV movements (per route and /or for each access) • Total HGV movements for the project • Shift patterns for workers. • Car share ratio (for which worker numbers and LGV movements would be required noting that workforce surveys provide incomplete data, or traffic counts) • Process for monitoring and reporting data including any non-compliance and enforcement action taken.
TT1.13.22	The Applicant		
TT1.13.23	The Applicant		
TT1.13.24	The Applicant		
TT1.13.25	Essex CC Suffolk CC	How often would local authority highway inspectors carry out statutory inspections of the highway network affected by the project?	SCC (Local Highway Authority) would highlight that the frequency of carriageway and footway safety inspections is stated in SCC's Highways Operational Plan 4.1.3 and 4.1.5. For carriageways, inspections vary from once every month (Strategic Routes e.g., A131 / Main Distributors e.g., A1071) to once every 6 months for local and minor roads (mostly unclassified and some C class roads). ⁴

⁴ <https://www.suffolk.gov.uk/asset-library/v2.2-hmop-2021-final-live-october-2023.pdf>

Reference	Question to:	Question	Local Authority Answer
TT1.13.26	The Applicant		
TT1.13.27	The Applicant		
TT1.13.28	The Applicant		
TT1.13.29	The Applicant		
TT1.13.30	The Applicant		
TT1.13.31	The Applicant		
TT1.13.32	The Applicant		
TT1.13.33	The Applicant		
TT1.13.34	The Applicant		
TT1.13.35	The Applicant		
TT1.13.36	Babergh DC Mid Suffolk DC Suffolk CC	Are you satisfied with the Applicant's response (page 66 of its Comments on Relevant Representations [REP1-025]) to point n) (Traffic and Transport) in your RRs ([RR-001] and [RR-006]) related to monitoring and enforcement of construction traffic?	<p>The Applicant's response in [REP1-025] does not satisfy SCC (Local Highway Authority)'s concerns regarding monitoring and enforcement as detailed in 12.84 to 12.93 of the LIR [REP1-045] as these comments were made in relation to the CTMP as submitted in the application and this has not been revised. SCC's position is that the CTMP and other plans should secure the key mitigation and provide monitoring, reporting and enforcement to ensure compliance with these values. To maintain confidence in the process the monitoring data should be provided to the LHA for scrutiny and preferably place in the public domain.</p> <p>Such key information is considered to be:</p> <ul style="list-style-type: none"> • HGV routes and timing • Daily HGV movements (per route and /or for each access) • Total HGV movements for the project • Shift patterns for workers. • Car share ratio (for which worker numbers and LGV movements would be required noting that workforce surveys provide incomplete data, or traffic counts)

Reference	Question to:	Question	Local Authority Answer
			<ul style="list-style-type: none"> Process for reporting data collecting including any non-compliance and enforcement action taken.
Temporary Traffic Regulation Orders			
TT1.13.37	The Applicant Essex CC Suffolk CC	Has agreement been reached between the relevant highway authorities and the Applicant on the use of Temporary Traffic Regulation Orders (Schedule 11 of the dDCO [APP-034] refers)? If not, what are the outstanding issues?	<p>SCC (Local Highway Authority) believes this should refer to Schedule 12 and answers accordingly.</p> <p>No agreement has yet been reached with SCC as Local Highway Authority. The concerns remain regarding the practicality of the parking restrictions as presented, although, SCC notes that selective restrictions at specific locations may be required particularly on AIL routes.</p> <p>Whilst SCC (Local Highway Authority) has no objection to the temporary 30mph speed limits, SCC would have concerns regarding driver compliance in the absence of traffic calming or enforcement and would not accept reduction in design standards purely relying on the implementation of such speed limits.</p>
TT1.13.38	The Applicant Essex CC Suffolk CC	What length of road markings and how many associated signs would be required for compliance with the current Traffic Signs Regulations and General Directions and to bring the proposed temporary waiting restrictions into lawful effect? (See Schedule 11 of the dDCO [APP-034].)	SCC (Local Highway Authority) would note that as presented in Schedule 12, the proposed parking restrictions would require single yellow lines (diagram 1017) together with prohibition of waiting signs (S4-3). Chapter 3 of the Traffic Signs Manual 13.4.14 recommend signs to be at 60m intervals. ⁵
TT1.13.39	The Applicant		
TT1.13.40	The Applicant		
TT1.13.41	The Applicant Essex CC	In relation to the temporary stopping up of streets and the temporary restriction of vehicular movement dDCO [APP-	SCC (Local Highway Authority) notes that s14 of the Road Traffic Regulation Act 1984, ⁶ refers to temporary prohibition or restriction on roads. The term “stopping up” would be included in Part VIII of the Highways Act 1980, ⁷ and refers to

⁵ <https://assets.publishing.service.gov.uk/media/5c78f895e5274a0ebfec719b/traffic-signs-manual-chapter-03.pdf>

⁶ <https://www.legislation.gov.uk/ukpga/1984/27/section/14>

⁷ <https://www.legislation.gov.uk/ukpga/1980/66/contents>

Reference	Question to:	Question	Local Authority Answer
	Suffolk CC	<p>034], Schedule 7, Parts 1 and 2, and Schedule 11, Part 3) can the Applicant explain:</p> <ul style="list-style-type: none"> i. for how long is it intended each restriction should operate? ii. what is the minimum and maximum period of closure sought for each location identified? iii. when would they be implemented? iv. how has the likely disruption to users of these streets been assessed in the Environmental Statement? v. what are the lengths of the proposed diversionary routes? vi. what mitigation measures would be used and how would these be secured in any DCO? <p>Are the proposed periods of closure likely to be acceptable to the highway authorities?</p>	<p>removal of highway rights. It is presumed the powers sought by the Applicant are in relation to the former temporary restriction.</p> <p>The acceptability of a duration of any closure will depend on the classification and use of the highway together with the suitability or otherwise of any proposed diversion. Generally, SCC (Local Highway Authority) would seek to avoid restrictions on A and B class roads or seek restricting closures to times with low traffic flows. The Traffic Management Act 2004 s16,⁸ places a network management duty on local traffic authorities so as far as may be reasonably practical to secure the expeditious movement of traffic on the authority's road network. As such, SCC would seek to minimise the number and duration of any restrictions.</p>
TT1.13.42	The Applicant		
TT1.13.43	The Applicant		
Temporary and permanent measures to access the works			
TT1.13.44	The Applicant		
TT1.13.45	The Applicant		
TT1.13.46	The Applicant		
TT1.13.47	The Applicant		

⁸ <https://www.legislation.gov.uk/ukpga/2004/18/section/16>

Reference	Question to:	Question	Local Authority Answer
TT1.13.48	Essex CC Suffolk CC	The Applicant proposes to gain authorisation to erect temporary signs on the highway using the permit scheme described in Section 2.4 of the CTMP [APP-180]. Would you be satisfied to authorise consent to erect temporary signage under a permit scheme?	Generally, SCC (Local Highway Authority) manages temporary traffic management signage through the NRSWA permit scheme provided that the duration does not necessitate the use of semi-permanent signs with concrete or other underground foundations. In this case, SCC would expect the Applicant to enter a Highways Act 1980 s278 agreement. The latter is considered to be necessary due to the risks associated with excavation in the public highway.
TT1.13.49	Essex CC Suffolk CC	The Applicant proposes to gain authorisation to erect scaffolding over the highway using the permit scheme described in Section 2.4 of the CTMP [APP-180]. Would you be satisfied to issue a licence for scaffolding oversailing the public highway using a permit scheme?	Usually, SCC (Local Highway Authority) would prefer to issue a license under s177 of the Highways Act 1980 for oversailing of the highway. However, SCC would not object to using the NSW permit process subject to certification that the scaffold has been designed and independently checked.
TT1.13.50	The Applicant		
TT1.13.51	The Applicant		
TT1.13.52	The Applicant		
TT1.13.53	The Applicant		
Public rights of way			
TT1.13.54	The Applicant Essex CC Suffolk CC	Would local authority Public Rights of Way Officers be involved in monitoring of: (i) temporary signage; (ii) the various forms of public rights of way closures; (iii) safety measures; (iv) condition surveys; and	SCC (PROW) as Highway Authority would require the applicant through a Rights of Way Management Plan to lead and deliver all on all aspects of monitoring. This would be done in agreement with the relevant Highway Authority. The Applicant would be required to undertake all aspects of temporary signage, safety measures, communication with communities and users on temporary closures.

Reference	Question to:	Question	Local Authority Answer
		(v) the reinstatement and inspections of the public rights of way affected by the project?	In addition, pre commencement condition surveys would be required to be undertaken by the applicant and method of reinstatement. Details would be required to be provided to the Highways Authority prior to commencement.
TT1.13.55	The Applicant		
TT1.13.56	The Applicant		
TT1.13.57	The Applicant		
TT1.13.58	The Applicant		
TT1.13.59	The Applicant		
TT1.13.60	The Applicant		
TT1.13.61	The Applicant		
TT1.13.62	The Applicant Essex CC Suffolk CC	Has the scope of the survey work to would need to be carried out to ensure that final reinstatement would return public rights of way to their original condition on completion of the Proposed Development been agreed? (Section 4.7 of the CEMP [APP-177] and paragraph 6.2.3 of the CTMP [APP-180].)	SCC (PROW) as Highway Authority would require the applicant to carry out pre commencement surveys of all routes. This would be required through a Rights of Way Management Plan to cover methodology for reinstatement. This has currently not fully been agreed and SCC awaits a Rights of Way Management Plan.
Navigation			
TT1.13.63	The Applicant		
TT1.13.64	The Applicant		
TT1.13.65	The Applicant		
TT 1.13.66	The Applicant		