Suffolk County Council

Suffolk County Council (20041323)

Post-Hearing Submission for the Third Issue Specific Hearing (ISH3) into Transport and Rights of Way

Bramford to Twinstead (EN020002)

Deadline 4

16 November 2023

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Glossary of Acronyms

DCO	*Development Consent Orders*
EIA	*Environmental Impact Assessment*
ExA	*Examining Authority*
ExQ	*Examining Authority's Written Questions*
ISH	*Issue Specific Hearing*
LHA	*Local Highways Authority*
PROW	*Public Rights of Way*

"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 a written summary of representations made by Suffolk County Council at the Third Issue Specific Hearing (ISH3), on 9 November 2023, into transport and rights of way. Examination Library references are used throughout to assist readers.

Item	Suffolk County Council's Summary of Oral Case and responses to questions	References
1	**Welcome, preliminary matters and introductions**	
	Suffolk County Council were represented by the following team in person: - Graham Gunby, National Infrastructure Planning Manager, Suffolk County Council - Michael Bedford KC, Barrister, Cornerstone Barristers - Steve Merry, NSIP Highway Manager, Suffolk County Council - Julia Cox, Senior Engineer (NSIPs and Projects), Suffolk County Council - Claire Dickson, Operations Manager (Rights of Way and Access), Suffolk County Council Attending colleagues were supported by the following team virtually: - Callum Etherton, Project Officer (Energy Infrastructure), Suffolk County Council	
2	**Purpose of the Issue Specific Hearing**	
3	**Transport Assessment and methodology used to assess traffic impacts**	
3.1	**To include (*inter alia*):**	
	3.1.a. Shift pattern SCC (LHA) notes that in the staff vehicle forecast assumptions in para 6.2.9 of the Transport Assessment [**APP-061**] workers traveling in conformance with the proposed shift patterns is presumed to avoid generating significant vehicle movements within the network peak hours (i.e., 0800-0900, 1700-1800). The Transport Assessment assumes that only 12.5% of worker trips will take place during each of the network peak hours. However, neither the shift pattern,	CEMP [**REP3-025**] CTMP [**REP3-031**]

	nor workers trips are secured in any management document and may be subject to change once a principal contractor is appointed (CEMP 2.2.1). **3.1.b. Traffic survey data** SCC (LHA) is content that the applicant has presented sufficient traffic data to enable existing baseline flows across the network to be assessed but notes that this information is not included in the application documents nor shared with the authority. Additional speed surveys should be undertaken at access points to aid the design and operation of safe access. **3.1.c. Evidence supporting construction traffic figures** SCC (LHA) has requested that NG provide the data used to estimate construction trips (HGV, LGV and workers) to enable the authority to reach an informed position and accept that the figures represent a realistic worst-case scenario. **3.1.d. Traffic management** Traffic management shall be in accordance with TSM Chapter 8 or the Safety at Street Works and Road Works: A code of Practice and subject to the SCC permit system regardless of any requirements for highway agreements necessary to technically accept and inspect such works. Suffolk Joint LIR **[REP1-045]** paragraph 12.110. **3.1.e. Road safety** SCC (LHA) are content with the review of cluster sites on the network but concerned that this does not show the full picture. The authority has requested that NR undertake route reviews of certain roads where there are concerns that the collision rate may exceed national averages. The review of cluster sites can also result in the impacts at staggered junctions being missed, for example at the Bear Steet / A134 junction at Nayland where the minor roads are more than 50m apart so show as two separate clusters. **3.1.f. Peak and average staff numbers** The peak construction staff numbers are estimated in 4.4.54 of the Product Description [**APP-061**] as 350 for the worst-case alternative scenario and an average of 180 per day [**APP-091**]. SCC has not seen any details of how this number was estimated or evidenced nor whether this includes visitors and support staff.	Suffolk Joint LIR [**REP1-045**] Environmental Statement: Main Report

	Suffolk Joint LIR **[REP1-045]** paragraph 12.63 lists the information considered to be lacking in the application. No additional information has yet been provided to SCC. **3.1.g. Assumptions relating to construction vehicles or construction worker vehicles** SCC (LHA) would welcome more data to understand how the estimated of total construction vehicle and splits into HGV, LGV and cars has been determined. The authority notes that the calculation in Table 6-2 of the Construction Schedule presumes that the total peak month number of HGVs and LGVs are equally distributed across the days of the month without allowing for fluctuations although the 12.5% slippage allowance may counterbalance this. SCC also notes that the applicant has looked at the proportion of HGVs in network peak hours where the background trips are highest and therefore discounted the greater impact of the same construction trips when the base traffic is lower in the interpeak periods. **3.1.h. Linking construction works to construction vehicle or construction worker vehicles** SCC (LHA) has no comment other than to note that the Council would welcome more information on this. **3.1.i. Closures needed for construction of accesses and the trench crossings** SCC (LHA) considers that any carriageway less than 7.4m in width will require closure for trench crossings. Roads of widths less than 4.5m would also require closure to provide safe working space although this presumes all construction work is undertaken from the verge. Providing safe working clearances will be difficult for road widths less than this will. Suffolk Joint LIR **[REP1-045]** paragraph 12.109. **3.1.j. Works gangs** SCC (LHA) has no comment. **3.1.k. Inspections** SCC (LHA) has no comment. **3.1.l. Road crossings**	Chapter 4 – Product Description [**APP-061**] ES Appendix 4.2: Construction Schedule [**APP-091**]

	SCC preference is for road crossings to be by trenchless methods if practical as this reduces disruption to the travelling public and minimises damage to the fabric of the highway. **3.1.m. Approach to impacts from pre-commencement operations** SCC (LHA) welcomes that the management plans cover pre-commencement activities (dDCO art 2). However, as these documents will be subject to change one a principal contractor is appointed is concerned that there is no procedure for updating and approving the management plans in advance of the start of pre-commencement works. Although not directly related to impact, SCC considers that clarification is required regarding the scope of temporary accesses within the definition. Do these include all temporary accesses required by the project like schedule 8) or only those required for such activities as surveys, archaeology, site clearance listed in the definition? *"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;* **3.1.n. Intra-projects cumulative effects** SCC (LHA) has no comment. **3.1.o. Inter-projects cumulative effects** SCC (LHA) is concerned that current methodology whilst including cumulative impacts for projects undertaken at the same time and place there is no consideration of repeated projects impacting local communities on a regular basis. SCC considers that there needs to be an assessment not only of concurrent projects but also of consecutive and successive projects, whether or not they overlap in terms of precise timings. The highway network and in particular the PRoW network has had repeated impacts in the Bramford area (EA1, EA3) and will, if consented, be impacted by this project and Norwich to Tilbury. Four NSIPs over less than 8 years.	Draft Development Consent Order [**REP3-008**] Transport Assessment [**APP-061**]

	The Councils response is set out in paragraphs 12.70 and 12.71 of the Suffolk Joint LIR **[REP1-045]**. **3.1.p. Any other matters arising from the responses to the Examining Authority's First Written Questions** TT1.13.2: The applicant has not shared the junction analysis model outputs with SCC other than the high-level summary in the TA Appendix E so the authority is unable to comment on this detail.	
4 Construction traffic and construction route strategy		
4.1 Whether construction traffic associated with the construction of the project is 'extraordinary traffic'		
	SCC (LHA) considers that as this is a nationally strategic infrastructure project that there is a high likelihood that the associated traffic required to construct a project of this scale and nature is above that expected for the local highway network. The scale and intensity of the movements exceeds that of even large developments in the area. Highways Act 1980 s59 states that: Subject to subsection (3) below, where it appears to the highway authority for a highway maintainable at the public expense, by a certificate of their proper officer, that having regard to the average expense of maintaining the highway or other similar highways in the neighbourhood extraordinary expenses have been or will be incurred by the authority in maintaining the highway by reason of the damage caused by excessive weight passing along the highway, or other extraordinary traffic thereon, the highway authority may recover from any person ("the operator") by or in consequence of whose order the traffic has been conducted the excess expenses. SCC (LHA) seeks to formalise this process through mutual agreement and basing decisions on data rather than having to argue a case through the courts. SCC considers that a proactive approach which sets out an effective regime for monitoring and managing the impacts of the development on the local highway network is preferable to a reactive response that entails potential litigation (with attendant delay, cost, and uncertainty) is the preferred way forward. SCC would welcome further discussion with the Applicant on agreeing suitable mechanisms to carry this	Highways Act 1980.[1]

[1] https://www.legislation.gov.uk/ukpga/1980/66/section/59

	forward. In the authority's opinion it is unreasonable to expect Suffolk (and Essex) ratepayers to solely fund any addition repairs necessary to maintain the highway when used by this additional traffic.	
4.2 Methodology, measures and commitments in the Construction Traffic Management Plan		
	4.2.a. For pre-commencement activities SCC (LHA) welcomes that the CTMP covers pre-commencement works but has some concerns regarding the plan itself and the scope of some pre-commencement activities such as forming temporary accesses. See 3.1m. **4.2.b. Approval of construction routes** Construction routes are included as Figure 1 of the revised CTMP. SCC (LHA) notes that this includes routing though Sudbury and Great Cornard via the A131 and B1508. The authority is open to discussions regarding use of U8637 Shawlands Avenue / C732 Canhams Road and Head Lane. Whilst this is a lower class of road (i.e., unclassified rather than B1508 Bures Road the maintenance classification is the similar as the B1508 and this would avoid passing through the centre of Sudbury particularly on the outbound journeys. **4.2.c. Approval of signage** Signage on the local highway network should either be authorised through the NRSWA permit system if a 'standalone' operation e.g. direction signs to site compounds, or through the s278 approval process if associated with physical highway works such as access construction or removal. SCC (LHA) notes that signing and road markings would be approved through a s278 highway agreement and not a permit as proposed by the applicant in TT1.13.38. SCC (LHA) has not been consulted on enforcement of parking restrictions (TT1.13.39) nor are we aware that the applicant has been in communication with Ipswich Borough Council and West Suffolk Council who undertake enforcement on the authority's behalf. **4.2.d. Structural surveys and repairs** In SCC (LHA)'s view there are two elements to structural surveys and repairs, those relating to maintaining the condition of the carriageway when subject to construction traffic and the inspection, review and assessment of	CTMP **[REP3-031]**

	highway structures to ensure that they can safely carry the AILs required by the applicant. Several structures on the routes from the Port of Ipswich to Bramford are subject to STGO3 or heavier restrictions. Whilst this may be overcome using temporary bridging this has a significant disruptive impact on the highway network which has not been assessed by the client. **4.2.e. Monitoring and control of HGV and construction worker movements** SCC (LHA)'s view is that with the uncertainty regarding the construction program that will only be finalised following appointment of a principal contractor the maximum daily HGV movements, worker movements, construction hours and routes should be secured in the management plans. SCC cannot see how the management plans can be regarded as other than outline or draft at this stage and should be subject to an approval process once a contractor is appointed and prior to the start of pre-commencement works**.**	
4.3 Other controls and mitigation		
	4.3.a. Detailed Abnormal Indivisible Loads Management Plan SCC (LHA) considers that further work is required to demonstrate that the AIL access routes are feasible. This is in terms of dimensions such as the risk of loads oversailing third party land and the impacts on street furniture and load capacity of highway structures. When assessing load movements from Ipswich to Bramford the authority's bridge engineers have place restrictions on a number of structures (A137 Ostrich Creek, A1214 Water Main and B1113 Rail and River bridges). Suffolk Joint LIR **[REP1-045]** paragraphs 12.95 to 12.98. **4.3.b. Detailed Port Traffic Management Plan** If the project requires use of ports that creates a significant volume of traffic that exceeds that permitted by extant use of the port (Suffolk Joint LIR **[REP1-045]** Table 10 d and e) a Port Traffic Management Plan should be submitted for approval. **4.3.c. Decommissioning Traffic Management Plan** SCC (LHA) would be content if a separate Decommissioning Traffic Management Plan were presented for approval prior to commencement of decommissioning (Suffolk Joint LIR **[REP1-045]** paragraph 12.11, Table 10).	Suffolk Joint LIR [**REP1-045**]

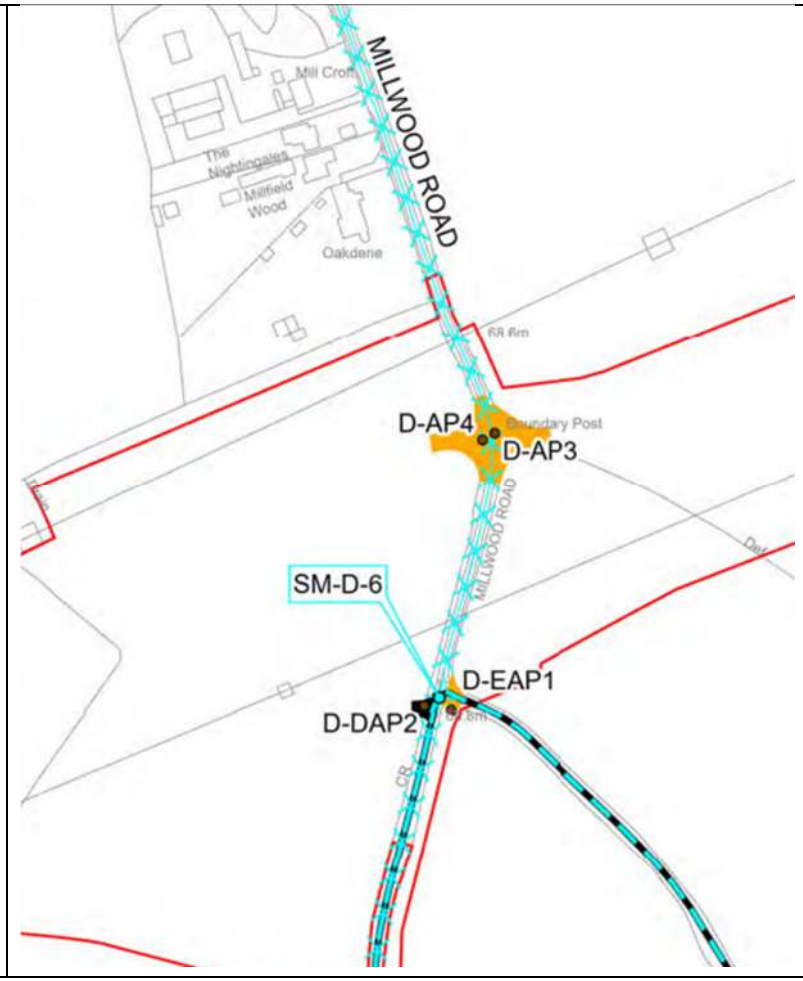
4.4 Any other matters arising from the response to the Examining Authority's First Written Questions		
	TT1.13.11. Does the applicant have examples or evidence of successful use of crew buses (i.e., not minibuses) to transport workers? TT1.13.21 Agreement has not been reached with SCC with regard to monitoring and enforcement of the CTMP. The matters remain as set out in our LIR. TT1.13.23 SCC notes that there is no requirement in any management plan to report or enforce vehicle emission controls. TT1.13.32 Identification of contract vehicles falls short of what is proposed for SPR relying solely on the vehicle registration being supplied by any compliant.	
5 Proposed temporary traffic restrictions		
5.1 The need for the proposed parking restrictions		
	SCC (LHA) considers the proposed parking restrictions are disproportionate for example in terms of signage and road markings compared to the risk of parked vehicles obstructing the carriageway (as Suffolk Joint LIR Annex D **[REP-044]** paragraph D.37). Removal of road markings from surface dressed roads, as commonly found on the SCC network, either by thermal lance or high-pressure jetting has been found to significantly damage the surface requiring repair.	LIR Annex A to F [**REP1-044**]
5.2 National street gazetteer		
	SCC (LHA) notes that the applicant has updated schedules 5, 6, 7, 8 and 12 in **[REP3-008]** but has not yet checked the revised schedules although it does not expect its evidence presented in Appendix F of the LIR to change.	LIR Annex A to F [**REP1-044**]
5.3 Reliance on a temporary speed limit to slow vehicles		

	SCC (LHA) considers that temporary speed limits used in isolation may not reduce traffic speeds to the desired limits and that designing temporary access based only on temporary speed limits may not be acceptable (e.g., in terms of safe visibility). The authority is also concerned that the speed limits are temporary and the roads on which permanent accesses are formed revert to existing limits and this does not appear to have been considered by the applicant in any design of the access nor assessing the amount of vegetation clearance required for safe visibility. Suffolk Joint LIR **[REP1-045]** paragraph 12.102.	Suffolk Joint LIR **[REP1-045]**
5.4 Any other matters arising from the responses to the Examining Authority's First Written Questions		
	TT1.13.13 SCC notes that the applicant has not included the speed data within the TA, nor has data been collected for all access points. TT1.13.16 SCC notes that several structures between the Port of Ipswich and Bramford Substation re subject to restrictions for AIL movements (STGO3 and above). SCC is not in a position to guarantee that these or other structures will be maintained to carry loads greater than 44 tonnes.	
6 Temporary and permanent measures that are sought for access to the Proposed Development		
6.1 Proposed access points, bell mouths and access tracks and roads, including the haul road from the A131 and the 'hybrid' solution raised by Pebmarsh Parish Council and others		
	The A131 and the Parish of Pebmarsh are within Essex so SCC would not comment on this specific matter. However, our review of the design of the temporary accesses can be found in Annex D of the Suffolk Joint LIR (paragraphs D.42 to D.49).	LIR Annex A to F [**REP1-044**]
6.2 Vegetation to be removed		
	SCC (LHA) remains concern that inadequate information has been provided to allow the authority to assess the scale of vegetation required to provide safe access to the site, nor that the order limits are, in combination with land within highway control, sufficient to provide the required visibility (Suffolk Joint LIR paragraphs 12.39 and 12.40).	Suffolk Joint LIR [**REP1-045**] and

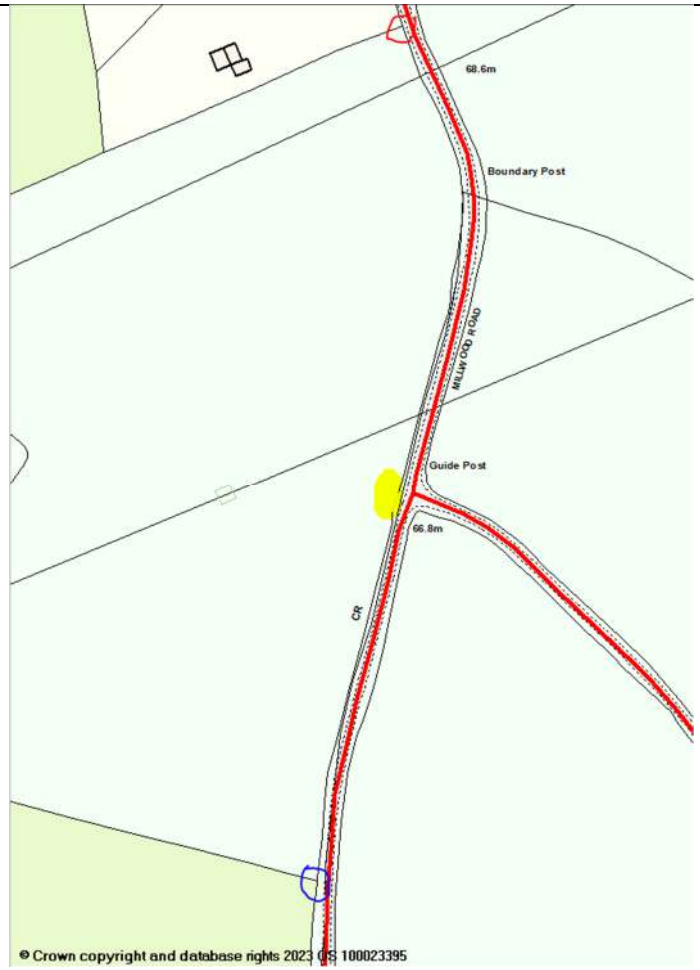
	The plans provided are of such large scale to make it difficult to measure the areas proposed for visibility splays. Annex F of the Suffolk Joint LIR [**REP1-044**] gives a high-level review of the existing and construction phase layouts for the accesses in Suffolk. *Temporary* An example from Church Hill, Burstall in our option shows the issues. The road is currently derestricted but will be subject to a temporary 30mph limit during construction. Even allowing for such a temporary speed limit having good compliance, this will still require a 2.4m x 90m visibility splay as required as by the Suffolk Design Street Guide 2022 Appendix F (see Appendix 1). This would necessitate significant trimming if not removal of trees and hedges. SCC also notes that pollarding / raising the crown of trees whilst practical for individual trees would not resolve the visibility issues if there were a line of trees. 	Annex F of the LIR [**REP1-044**] Works Plans [**APP-010**] Access Rights of Way and Public Rights of Navigation Plans [**APP-012**] Trees and Hedgerows to be Removed or Managed Plans [**APP-017**]

Distance across the area included in the order limit for scale.

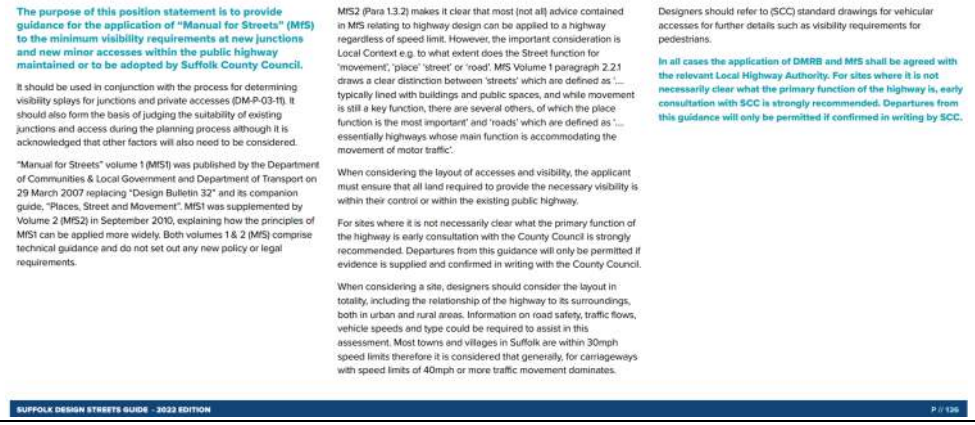
A second example is the permanent access D-DAP2 off Millwood Road, Polstead. The road is derestricted (60mph) and as the temporary speed limit will be remove post construction will require a 2.4m x 215m visibility splay to conform with design standards in the operational phase. The 'Trees and Hedgerows to be Removed or Managed Plans' sheet 12 only shows the hedges to be coppiced which unless repeatedly cut (to 600mm agl) would not provide acceptable visibility. It is noted that the visibility for D-DAP4 on inside of the bend will also be poor.


MILLWOOD ROAD
Mill Croft
The Nightingales
Millfield Wood
Oakdene
RR Rm
D-AP4
Boundary Post
D-AP3
MILLWOOD ROAD
SM-D-6
D-EAP1
D-DAP2
CR

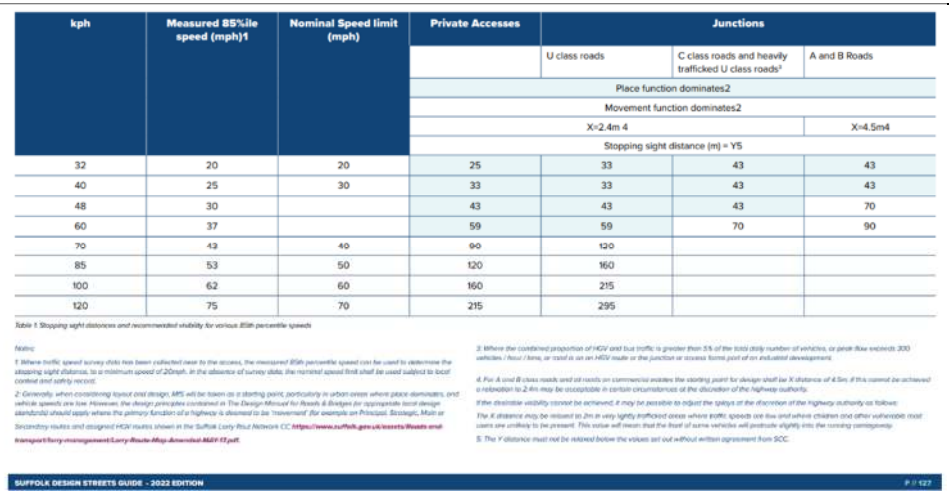
The distance from the access (yellow) to the corner of the field marked in red is @188m and that to the corner marked in blue @152m



6.3	**Any other matters arising from the responses to the Examining Authority's First Written Questions**	
	TT1.13.22 SCC would expect to secure measures in any highway agreement to ensure that mud, water or other debris does not flow or be carried onto the public highway. The authority also notes the limited effectiveness of such	ExA's First Written

	material by road sweepers. TT1.13.44 SCC would disagree that the generic bellmouth design accommodates all vehicles. Movement into and out of the access is also a function of the existing road layout such as width, curvature and highway verge available for oversailing and that no street furniture, vegetation or third-party property will be affected by movements. An understanding of the estimated traffic at each location would assist SCC in understanding if mitigation such as traffic control could be used to reduce the impacts at specific locations. TT1.13.47 If the splays are designed for a derestricted road this would require a minimum of 2.4m x 215m splay. The revised generic bellmouth access [**REP3-005**] does not include dimensions of splays. Appendix F: MfS Position Statement in Suffolk Design Street Guide[2] sets out SCC's position on junction visibility (see Appendix 1).  **The purpose of this position statement is to provide guidance for the application of "Manual for Streets" (MfS) to the minimum visibility requirements at new junctions and new minor accesses within the public highway maintained or to be adopted by Suffolk County Council.** It should be used in conjunction with the process for determining visibility splays for junctions and private accesses (DM-P-03-11). It should also form the basis of judging the suitability of existing junctions and access during the planning process although it is acknowledged that other factors will also need to be considered. "Manual for Streets" volume 1 (MfS1) was published by the Department of Communities & Local Government and Department of Transport on 29 March 2007 replacing "Design Bulletin 32" and its companion guide, "Places, Street and Movement". MfS1 was supplemented by Volume 2 (MfS2) in September 2010, explaining how the principles of MfS1 can be applied more widely. Both volumes 1& 2 (MfS) comprise technical guidance and do not set out any new policy or legal requirements. MfS2 (Para 1.3.2) makes it clear that most (not all) advice contained in MfS relating to highway design can be applied to a highway regardless of speed limit. However, the important consideration is Local Context e.g. to what extent does the Street function for 'movement', 'place' 'street' or 'road'. MfS Volume 1 paragraph 2.2.1 draws a clear distinction between 'streets' which are defined as '... typically lined with buildings and public spaces, and while movement is still a key function, there are several others, of which the place function is the most important' and 'roads' which are defined as '... essentially highways whose main function is accommodating the movement of motor traffic'. When considering the layout of accesses and visibility, the applicant must ensure that all land required to provide the necessary visibility is within their control or within the existing public highway. For sites where it is not necessarily clear what the primary function of the highway is early consultation with the County Council is strongly recommended. Departures from this guidance will only be permitted if evidence is supplied and confirmed in writing with the County Council. When considering a site, designers should consider the layout in totality, including the relationship of the highway to its surroundings, both in urban and rural areas. Information on road safety, traffic flows, vehicle speeds and type could be required to assist in this assessment. Most towns and villages in Suffolk are within 30mph speed limits therefore it is considered that generally, for carriageways with speed limits of 40mph or more traffic movement dominates. Designers should refer to (SCC) standard drawings for vehicular accesses for further details such as visibility requirements for pedestrians. **In all cases the application of DMRB and MfS shall be agreed with the relevant Local Highway Authority. For sites where it is not necessarily clear what the primary function of the highway is, early consultation with SCC is strongly recommended. Departures from this guidance will only be permitted if confirmed in writing by SCC.** SUFFOLK DESIGN STREETS GUIDE - 2022 EDITION P // 126	Questions [**REP3-052**]

[2] https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf



kph	Measured 85%ile speed (mph)1	Nominal Speed limit (mph)	Private Accesses	Junctions		
				U class roads	C class roads and heavily trafficked U class roads3	A and B Roads
			Place function dominates2			
			Movement function dominates2			
			X=2.4m 4			X=4.5m4
			Stopping sight distance (m) = Y5			
32	20	20	25	33	43	43
40	25	30	33	33	43	43
48	30		43	43	43	70
60	37		59	59	70	90
70	43	40	90	120		
85	53	50	120	160		
100	62	60	160	215		
120	75	70	215	295		

Table 1 Stopping sight distances and recommended visibility for various 85th percentile speeds

SUFFOLK DESIGN STREETS GUIDE - 2022 EDITION

TT1.13.52 It has been common practice for the applicant to undertake a stage 1 Road Safety Assessment on access at the examination stage (Sunnica, EA1(N), EA2, SZC).

7 Public rights of way, and assessment of construction and traffic impacts on walkers, cyclists and horse riders

7.1 Public right of way closures and diversions, and their sequencing

	The Public Rights of Way Management Plan [**REP3-056**] provides details on length of closure including reasoning. Details not provided for the sequence, when these will be closed and those that will be closed at the same period of time.	8.5.8 PROW Management Plan [**REP3-056**]

7.2 Assessment of severance, amenity and fear and intimidation

	Assessment cannot be fully undertaken on the effect on severance without the sequencing of the closures. Details not provided within the Public Rights of Way Management Plan [**REP3-056**].	8.5.8 PROW Management Plan [**REP3-056**]

7.3 Implications of proposed working hours and a seven-day working week		
	Higher use of the network is outside of main working hours of 9am to 5pm for local recreational use on weekdays. Combined with increased weekend use of the PROW network. In addition, with higher use in tourism focused areas during peak summer months, particularly relating to weekends and bank holidays. Consideration should be given to part weekend working for areas covering the PROW network. Use is likely to be from outside the local community and communication of any restrictions to wider users would be key.	
7.4 Any other matters arising from the responses to the Examining Authority's First Written Questions		
	No matters raised.	
8 Any other business		
	SCC (LHA) notes that the generic bellmouth design has been updated. Whilst it now shows visibility splays drawn correctly to intercept the edge of the carriageway, it still does not consider aspects of the existing highway such as bends, carriageway width, vertical profile etc. Nor does it specify the x and y visibility criteria, methodology to calculate these and how they vary with traffic speeds. At Deadline 3 [**REP3-049**], in the Applicant's response to the Suffolk Joint LIR paragraph 17.57 [**REP1-045**], the Applicant is requesting examples of where the authority considers that the Management Plans are to high level and therefore lacking detail so that they can amend their plans accordingly. We will include a response in our D5 submission but would refer the applicant to Annex D of the Suffolk Joint LIR [**REP1-044**] paragraphs D.114 to D132 and D.158 to D.163. *Permits* TA 1.4.4: A permit issued under the Permit Schemes would specify in detail the activity that is allowed. The types of conditions include timing and duration; road space; traffic management provisions; manner in which specified works are to be carried out; consultation and publicity; environmental conditions; and conditions to progress. The relevant highway authorities may also require the promoter to consult with persons likely to have apparatus in the	(B) Design and Layout Plans Temporary Bellmouth for Access [**REP3-005**] LIR Annex A to F [**REP1-044**] Highways Act

	street and comply with any reasonable requirements asked by the apparatus owner. Does not include design. Nor activities covered by licenses in the Highways Act 1980. Regarding Suffolk Joint LIR [**REP1-045**] paragraph 12.103, mentioning section 59 of the Highway Act 1980, the Applicant's project has the potential to result in extraordinary traffic, particularly due to Abnormal Indivisible Loads, and thus cause additional damage to the highway beyond usual traffic that can be expected to use the network. Whilst SCC (LHA) recognise the statutory provision, SCC (LHA)'s preference would be to capture costs for any damages caused by extraordinary traffic via the highway side agreement with the Applicant, in a collaborative manner, rather than enforcement via the adversarial process of section 59 of the Highway Act 1980.	1980.[3] Transport Assessment [**APP-061**]
9	**Review of actions arising**	
	There were three actions points for Suffolk County Council **[EV-045]** (with a further two answered during the hearing, also included), as noted below with resolutions: **9.1.a. AP1 (Suffolk County Council) Provide Suffolk County Council's highways design standards (as relevant to the Proposed Development) by Deadline 4** See Appendix 1 for SCC's Suffolk Design Streets Guide 2022 Appendix F, for information relevant to visibility splays. **9.1.b. Regarding proposed bellmouth at Church Hill, to confirm stopping site distance and design speeds for determinants for the access point** SCC (LHA) officers noted that the process would be, as a derestricted road at the moment, (i.e., 60mph) that it would be 2.4m x 215m visibility splay. If the Applicant were to undertake speed surveys and SCC were able to confirm a safe stopping distance to design the junction based on actual traffic speeds (85%ile measured speed), then that would be the next step down. The Applicant is proposing a 30mph temporary speed limit, if implemented and SCC were content with the 85%ile traffic speed of 30mph being achieved then visibility splay could be reduced	Suffolk Design Street Guide v26.[4]

[3] https://www.legislation.gov.uk/ukpga/1980/66/section/59

[4] https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf

	to 2.4m x 90m. Dependent on amount of traffic, SCC may be able to relax that further still if there was a suitable management plan in place that safely controls the traffic in and out of the access. However, due to the proximity of accesses it may not be practical to implement traffic management at significant numbers of access points and if widely used or of long duration the impacts on road users in terms of delay should be assessed. **9.1.c. AP3 (Suffolk County Council) Provide a prioritised list of the key missing assumptions and inputs that are perceived to be missing from the transport assessment** SCC (LHA) will provide a "current state of play" update at Deadline 5 with a position statement at Deadline 5 or 6. **9.1.d. AP5 (Suffolk County Council) Identify the base parameters that are critical for the CTMP** SCC (LHA) will provide a "current state of play" update at Deadline 5 with a position statement at Deadline 5 or 6. **9.1.e. To enter into the Examination high level access assessment** SCC (LHA) can confirm that this was provided at Deadline 1 as Annex F of the Suffolk Joint LIR **[REP1-044]**).	
10	**Close of Issue Specific Hearing 3**	

Appendix 1 – Suffolk Design Streets Guide 2022 Appendix F

Appendix F

MfS Position Statement

The purpose of this position statement is to provide guidance for the application of "Manual for Streets" (MfS) to the minimum visibility requirements at new junctions and new minor accesses within the public highway maintained or to be adopted by Suffolk County Council.

It should be used in conjunction with the process for determining visibility splays for junctions and private accesses (DM-P-03-11). It should also form the basis of judging the suitability of existing junctions and access during the planning process although it is acknowledged that other factors will also need to be considered.

"Manual for Streets" volume 1 (MfS1) was published by the Department of Communities & Local Government and Department of Transport on 29 March 2007 replacing "Design Bulletin 32" and its companion guide, "Places, Street and Movement". MfS1 was supplemented by Volume 2 (MfS2) in September 2010, explaining how the principles of MfS1 can be applied more widely. Both volumes 1 & 2 (MfS) comprise technical guidance and do not set out any new policy or legal requirements.

MfS2 (Para 1.3.2) makes it clear that most (not all) advice contained in MfS relating to highway design can be applied to a highway regardless of speed limit. However, the important consideration is Local Context e.g. to what extent does the Street function for 'movement', 'place' 'street' or 'road'. MfS Volume 1 paragraph 2.2.1 draws a clear distinction between 'streets' which are defined as '.... typically lined with buildings and public spaces, and while movement is still a key function, there are several others, of which the place function is the most important' and 'roads' which are defined as '.... essentially highways whose main function is accommodating the movement of motor traffic'.

When considering the layout of accesses and visibility, the applicant must ensure that all land required to provide the necessary visibility is within their control or within the existing public highway.

For sites where it is not necessarily clear what the primary function of the highway is early consultation with the County Council is strongly recommended. Departures from this guidance will only be permitted if evidence is supplied and confirmed in writing with the County Council.

When considering a site, designers should consider the layout in totality, including the relationship of the highway to its surroundings, both in urban and rural areas. Information on road safety, traffic flows, vehicle speeds and type could be required to assist in this assessment. Most towns and villages in Suffolk are within 30mph speed limits therefore it is considered that generally, for carriageways with speed limits of 40mph or more traffic movement dominates.

Designers should refer to (SCC) standard drawings for vehicular accesses for further details such as visibility requirements for pedestrians.

In all cases the application of DMRB and MfS shall be agreed with the relevant Local Highway Authority. For sites where it is not necessarily clear what the primary function of the highway is, early consultation with SCC is strongly recommended. Departures from this guidance will only be permitted if confirmed in writing by SCC.

kph	Measured 85%ile speed (mph)1	Nominal Speed limit (mph)	Private Accesses	Junctions		
				U class roads	C class roads and heavily trafficked U class roads[3]	A and B Roads
			Place function dominates2			
			Movement function dominates2			
			X=2.4m 4			X=4.5m4
			Stopping sight distance (m) = Y5			
32	20	20	25	33	43	43
40	25	30	33	33	43	43
48	30		43	43	43	70
60	37		59	59	70	90
70	43	40	90	120		
85	53	50	120	160		
100	62	60	160	215		
120	75	70	215	295		

Table 1: Stopping sight distances and recommended visibility for various 85th percentile speeds

Notes:

1: Where traffic speed survey data has been collected near to the access, the measured 85th percentile speed can be used to determine the stopping sight distance, to a minimum speed of 20mph. In the absence of survey data, the nominal speed limit shall be used subject to local context and safety record.

2: Generally, when considering layout and design, MfS will be taken as a starting point, particularly in urban areas where place dominates, and vehicle speeds are low. However, the design principles contained in The Design Manual for Roads & Bridges (or appropriate local design standards) should apply where the primary function of a highway is deemed to be 'movement' (for example on Principal, Strategic, Main or Secondary routes and assigned HGV routes shown in the Suffolk Lorry Rout Network CC ***https://www.suffolk.gov.uk/assets/Roads-and-transport/lorry-management/Lorry-Route-Map-Amended-MAY-17.pdf.***

3: Where the combined proportion of HGV and bus traffic is greater than 5% of the total daily number of vehicles, or peak flow exceeds 300 vehicles / hour / lane, or road is on an HGV route or the junction or access forms part of an industrial development.

4: For A and B class roads and all roads on commercial estates the starting point for design shall be X distance of 4.5m; if this cannot be achieved a relaxation to 2.4m may be acceptable in certain circumstances at the discretion of the highway authority.

If the desirable visibility cannot be achieved, it may be possible to adjust the splays at the discretion of the highway authority as follows:

The X distance may be relaxed to 2m in very lightly trafficked areas where traffic speeds are low and where children and other vulnerable road users are unlikely to be present. This value will mean that the front of some vehicles will protrude slightly into the running carriageway.

5: The Y distance must not be relaxed below the values set out without written agreement from SCC.