

REP3-052 page 153, item LV1.9.46

The Applicant's response cites worst case visibility splay requirements (hence dictating hedge and tree removal) grossly at odds with Suffolk Highways standard conditions as published by them and further clarified by them at the Issue 3 hearings. Additionally, these greater SCC figures are based on the assumption that a 30mph scheme could be implemented at this location. It is therefore likely that the environmental damage will now be significantly in excess of that previously discussed, and correspondingly unlikely that the (so far only informally) proposed mitigation of requiring only minimal vegetation trimming can be achieved.

The ExA raised a specific query regarding this location but the Applicant has offered a generic response based on a statistical analysis across the whole project. Furthermore this analysis covers only "vegetation" based on short term regrowth of hedgerows. At this site, mature oak trees will be felled, which would fall outside this scope and so have not been covered in the assessment. Note that none of the affected oak trees bordering the highway appear as discrete trees in the Arboricultural Impact Assessment although lesser ones along the northern track boundary do. This has rendered the trees "invisible".

The Applicant has not answered the Examining Authority's second question at all: "Explain why you were not able to propose a less damaging option". A less damaging option does exist, as proposed by the property owner, so the absence of a response here is unsatisfactory.