



Suffolk County Council (20041323)

Post-Hearing Submission for the Sixth Issue Specific Hearing (ISH6) into Access, Transport, and Public Rights of Way

Bramford to Twinstead (EN020002)

Deadline 6

20 December 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 a written summary of representations made by Suffolk County Council at the Sixth Issue Specific Hearing (ISH6), on 14 December 2023, into Access, Transport, and Public 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	
	<p>Suffolk County Council were represented by the following team virtually:</p> <ul style="list-style-type: none"> - Graham Gunby, National Infrastructure Planning Manager, Suffolk County Council - Michael Bedford KC, Barrister, Cornerstone Barristers - Steve Merry, Transport Policy and Development 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 - 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.	Discussions between the Applicant and the local highway authorities in relation to the Applicant's Transport Assessment since Issue Specific Hearing 3 (9 November 2023): (i) Data and information shared; and (ii) state-of-play.	
	<p><u>(i) Data and information shared</u></p> <p>On 7 December 2023, SCC (LHA) was provided with:</p> <ul style="list-style-type: none"> • Plan of access AB-AP5 North of Rose Cottage Burstall; 	

	<ul style="list-style-type: none"> • Excel spread sheet of traffic movements as submitted by the applicant at D4 [REP4-006]; and • Speed survey and traffic volume data (multiple files). <p>On 8 December 2023, the Applicant shared reports from Wynns, a specialist haulier, as below:</p> <ul style="list-style-type: none"> • 21-1030 Bramford to Twinstead Report Bramford reactor 29.06.22; and • 21-1030 Bram-Twin Cable Drum AIL report 08.07.22. <p>SCC (LHA) notes that a plan showing the links accessed in the Environmental Statement was included in [REP5-025].</p> <p>The authority awaits further information as set out in D5 [REP5-034].</p> <p><u>(ii) State of Play</u></p> <p><u>Accesses</u></p> <p>Burstall, Rose Cottage: The plan does not show the vegetation, so SCC (LHA) are not able to comment at this stage.</p> <p>General: Although speed and classification data has been provided by the Applicant, this requires significant time to assess, therefore, SCC (LHA) have not been able to respond by Deadline 6. Although welcoming the additional details provided by the Applicant, SCC is concerned that the burden of checking whether safe, appropriate access can be provided appears to be being passed to the authority. SCC is further concerned that the Applicant has not undertaken sufficient rigorous review of this data (for example as proposed in 9.1b for AB-AP5) to show that the proposed locations are appropriate and do not create significant impacts such as removal of vegetation. Requirement 11 does not provide sufficient comfort to the authority as it is likely that if problems arise, pressure will be applied to accept a substandard layout.</p> <p>Site Visits: SCC intend to undertake additional visits specifically to look at vegetation removal required to provide safe access.</p>	
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<p><u>AIL Routes</u></p> <p>The AIL route through Sudbury requires further discussion with regard to outbound routing through the town and potential alternative routes.</p> <p>SCC (LHA) would ask that the Applicant to confirm that no AIL route is necessary to Bramford substation for example for cable drums, cranes or low loaders, presumably on the same route as the haul road subject to loads being less than the restrictions on the B1113 Bridges.</p> <p>The reports note new road alignments at the A1214/A1071 junction but not the revised junction layout at the A14/A137 Wherstead Interchange or the signalised pedestrian crossing on the A137 Wherstead Road, Ipswich.</p> <p>Agreement is needed:</p> <ul style="list-style-type: none"> - For a process to organise removal and reinstatement of street furniture; and - To recover costs for the above and any damage to the public highway. <p>SCC (LHA) considers this can be included in a highway agreement.</p> <p><u>Construction Routes</u></p> <p>SCC (LHA) remains concerned that articulated vehicles that complying with C & U legislation (i.e., not AILs) may have difficulty using some of the minor road junctions, for example in the Chattisham, Polstead and Assington areas.</p> <p><u>Construction Vehicle Volumes</u></p> <p>Again, SCC (LHA) welcomes the information. This is helpful to identify those accesses with the higher number of movements and generally those with the greatest risk. SCC has updated Review of Site Accesses (originating from Suffolk Joint LIR Annex F [REP1-044]) to show the total volumes estimated for each access. This revised version has been provided at Appendix 1 to this document.</p>	
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<p>3.2. Explanation and discussion (adverse impacts) of the local highway authorities’ submissions at Deadline 4 and Deadline 5 in relation to the Applicant’s Transport Assessment.</p>	
	<p><u>With regard to Environmental statement (Assessment)</u></p> <p>SCC (LHA) considers GEART more appropriate methodology than LA112, as the latter was developed specifically for National Highway (NH) Projects by NH. GEART was developed by a balanced committee for the intention of assessing construction impacts of large developments. SCC notes that in July 2023 GEART (1993) was replaced by new guidance and that the ExA has separately asked the parties as an Action Point following ISH6 to address its implications for the environmental assessment of the predicted traffic movements. This is addressed in section 10.2 below.</p> <p>The Councils requested a plan showing the sensitivity of the links reviewed within the ES on numerous occasions. This was supplied at D5 [REP5-025]. The authority is yet to use this fresh information to finish its review.</p> <p><u>Sensitivity</u></p> <p>Examples where sensitivity may have been underestimated are included below:</p> <ul style="list-style-type: none"> • A1071/8 The Street, Burstall to A1214: Between the B1113 Beagle Roundabout and A1214 route is regularly used by college students accessing Suffolk One from bus stops on A1071. Congested junctions. Medium Sensitivity? • A134/7 A1071 junction to Sudbury? Passes through Newton with Village Hall, Golf Course, Public House, all on south side, and bus stops. Footway on north side. No formal pedestrian crossing facilities. Medium Sensitivity? • B1508 Colchester Road Bures: Primary School within 250m, 2 No Churches, Narrow footways, no formal crossings. High Sensitivity. <p><u>Transport Assessment</u></p> <p>(iii) Road Safety: SCC (LHA) has expressed its opinion to the Applicant that focussing on clusters of collisions at junctions may not represent the full picture in terms of road safety. For example, the minor roads at the staggered crossroad on the A134 at Nayland are more than 50m apart thus considered as two clusters yet operates as a</p>

	<p>single junction. SCC considers that route analysis with recorded crashes benchmarked against similar roads would provide a better assessment of the issue. SCC understands that the Applicant shares these concerns and is doing an additional route-based review.</p> <p>SCC has submitted a document at Deadline 6 titled <i>Response to the Applicant’s Comments on Other Submissions Received at Deadline 4</i>, to respond to [REP5-025], SCC (LHA)’s response to item 3.1m is duplicated below as it relates to the Transport Assessment:</p> <p>3.1m The Applicant states the term temporary accesses within the definition of pre-commencement works includes those for construction of the project i.e., all temporary access. SCC would seek clarification from the Applicant that the vehicle movements associated with construction of these temporary accesses is included within the data presented in [REP4-006] 8.6.6 Transport Assessment Construction Vehicle Profile Data and whether commencement is at month 20.</p>	
<p>4 Construction traffic and construction route strategy:</p>		
<p>4.1. (i) Data and information shared and (ii) state-of-play of discussions between the Applicant and the local highway authorities since Issue Specific Hearing 3 (9 November 2023) in relation to construction traffic and the construction route strategy.</p>		
	<p>SCC (LHA) refers to its response to Agenda Item 3.1.</p>	
<p>4.2. Explanation and discussion (methodologies, measures and specificity) of the Applicant’s updated Construction Traffic Management Plan [REP3-030].</p>		
	<p>As set out in SCC’s Deadline 5 submission <i>Response to Action Points from CAH1, ISH2, ISH3 and ISH4</i> [REP5-034], there are key assumptions within the assessment of traffic that significantly affect the impacts, without agreement on those assumptions it is exceptionally difficult to comment on the impacts of the development. These are summarised below:</p> <ul style="list-style-type: none"> • No. of HGVs; 	

	<ul style="list-style-type: none"> • Timing of HGVs; • No. of staff; • Modal split of staff; • Shift patterns of staff; and • General absence of commitment to reporting or enforcement. <p>Whilst SCC (LHA) acknowledges the applicant has included construction routes within the CTMP [REP3-030] as an item of control, the authorities' concerns as set out in D5 [REP5-033] have yet to be resolved.</p> <p>Our general understanding of the current position with the Applicant is that there is unlikely to be any agreement on general controls on construction traffic, which is likely to be an impasse between the two parties and can be set out in the Statement of Common Ground.</p> <p>The Applicant has indicated that they may be amenable to controls on some of the particularly narrow routes, such as the rural country lanes that form part of some of the routes, which if committed to is welcomed by the Council.</p> <p>Notwithstanding the authorities' comments regarding controls being appropriate for all routes, Suffolk would consider the following would fall into this category:</p> <ul style="list-style-type: none"> • B1508 Colchester Road through Bures. Although a B class road it is narrow, bendy, flanked by listed buildings, narrow footways and no formal crossing points for pedestrians; • The Street, Assington; • High Road, Leavenheath; • Hadleigh Road / Calais Street, Polstead; • Holt Road, Polstead; 	
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<ul style="list-style-type: none"> • Stackwood Road, Millwood Road, Heath Road, Polstead Heath; • Overbury Hall Road, Lower Layham; • Clay Lane, Hadleigh; and • Woodlands Road, The Street, Lower Barn Road, Chattisham. <p>SCC (LHA) notes that bends and junctions on these roads may be difficult for articulated vehicles to negotiate.</p> <p><u>Worker Travel Patterns</u></p> <p>Whilst the Applicant has agreed to gather the following data in the CTMP 6.4.1 [REP3-030], the contractor will then compile a report where copies of which will be available to the relevant highway authorities on request:</p> <ul style="list-style-type: none"> • Percentage of onsite staff who have completed the Staff Travel Survey; • Percentage of onsite staff issued with Travel Information Packs; • Percentage of onsite staff signing up to the car-sharing database; • Car park usage in terms of how many spaces used and proportion split between construction workers and visitors; • Mode of transport used by workers to commute to the site; • Number of minibus/welfare van movements between the site compound and work fronts; and • Number of people car/vehicle sharing. <p>SCC (LHA) does not consider that this satisfies the authorities main concern that the Applicant’s assumption regarding shift patterns is realised, and that workers and visitors do not travel in network peak hours.</p> <p>SCC (LHA) would propose that targeted surveys are undertaken of vehicles arriving and departing the main site</p>

	compounds and accesses with significant worker visitor traffic on a regular, but not necessarily constant, basis.	
<p>5 Proposed temporary traffic restrictions:</p>		
<p>5.1. (i) Data and information shared and (ii) state-of-play of discussions between the Applicant and the local highway authorities since Issue Specific Hearing 3 (9 November 2023) in relation to the proposed temporary traffic restrictions.</p>		
	<p>SCC (LHA) notes that the application requires waiting restrictions and not parking, therefore, road signing would suffice, and road markings are unnecessary.</p> <p>Whilst SCC (LHA) has no objections to the proposed orders, its position remains that the use of such orders is much greater than for similar projects.</p> <p>SCC (LHA) also raised a concern as to whether for all those locations specified in Schedule 12 where a restriction on traffic was proposed by Article 47(1), the DCO consultation and publicity processes were sufficient, without more, to bring those restrictions to the attention of persons (whether residents or local businesses) who may be affected by those restrictions in those locations.</p> <p>SCC (LHA) welcomed the applicants' confirmation that it accepted that under Article 47(3) it would expect the traffic authorities to require a level of advertisement to be undertaken with local residents and businesses which would be in accordance with what would be needed for a traffic order under the Road Traffic Regulation Act 1984 so as to satisfy article 7(1) c (ii) and (iii) of The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.¹</p> <p><i>Publication of proposals</i></p> <p>7.—(1) An order making authority shall, before making an order,—</p>	

¹ <https://www.legislation.gov.uk/uksi/1996/2489/regulation/7/made>

	<p>(a)publish at least once a notice (in these Regulations called a “notice of proposals”) containing the particulars specified in Parts I and II of Schedule 1 in a newspaper circulating in the area in which any road or other place to which the order relates is situated;</p> <p>(b)in the case of an order under section 6 of the 1984 Act, publish a similar notice in the London Gazette;</p> <p>(c)take such other steps as it may consider appropriate for ensuring that adequate publicity about the order is given to persons likely to be affected by its provisions and, without prejudice to the generality of this sub-paragraph, such other steps may include—</p> <p>(i)in the case of an order to which sub-paragraph (b) does not apply, publication of a notice in the London Gazette;</p> <p>(ii)the display of notices in roads or other places affected by the order; or</p> <p>(iii)the delivery of notices or letters to premises, or premises occupied by persons, appearing to the authority to be likely to be affected by any provision in the order.</p>	
<p>5.2. The Applicant will be asked to justify the need for, and proportionality of the proposed temporary traffic regulation orders:</p>		
	<p>5.2.a. prohibition of waiting and restriction of speed;</p> <p>5.2.b. temporary restriction of access;</p> <p>5.2.c. temporary restriction of movement;</p> <p>5.2.d. temporary no overtaking.</p> <p>SCC (LHA) refers to its response to Agenda Item 5.1.</p>	

5.3. Permits	
	<p>5.3.a. consultation with other Statutory Undertakers;</p> <p>SCC (LHA) notes that Article 13(3) and (4) do not disapply s59 of the New Roads and Street Works 1991 Act² and therefore the duty to co-operate with other utilities remains.</p> <p>5.3.b. activities covered by licences in the Highways Act 1980;</p> <p>SCC (LHA) would explain that some works will be covered by licenses under the Highways Act 1980, notably:</p> <ul style="list-style-type: none"> • S169 control of scaffolding on highways;³ • S178 restriction on placing rails, beams etc over highways; • S278 agreements as to execution of works. <p>https://www.suffolk.gov.uk/roads-and-transport/highway-licences/crane-inc-oversail-mobile-elevating-work-platform-or-other-forms-of-lifting-equipment-licence</p> <p>https://www.suffolk.gov.uk/roads-and-transport/highway-licences/attachments-to-street-lighting-columns-or-electrical-installations-on-or-over-the-highway-licence</p> <p>https://www.suffolk.gov.uk/roads-and-transport/highway-licences/street-furniture-licence</p> <p>5.3.c. approval of temporary signage.</p> <p>Temporary signage will be approved through the permit system (temporary ‘A’ frames), licenses (where affixed to extant street furniture or street light columns) or s278 agreements (new fixed posts with foundations).</p>

² <https://www.legislation.gov.uk/ukpga/1991/22/section/59>

³ <https://www.suffolk.gov.uk/roads-and-transport/highway-licences/apply-for-a-scaffold-licence>

6 Temporary and permanent measures that are sought for access to the Proposed Development	
6.1. (i) Data and information shared and (ii) state-of-play of discussions between the Applicant and the local highway authorities since Issue Specific Hearing 3 (9 November 2023) in relation to temporary and permanent measures to access the proposed development.	
	<p><u>(i) Data and Information Shared</u></p> <p>On 7 December 2023, SCC (LHA) was provided with:</p> <ul style="list-style-type: none"> • Plan of access AB-AP5 north of Rose Cottage Burstall. As this does not include details of the existing vegetation it remains difficult to identify if any trees or hedges need to be removed or trimming is sufficient; • Bramford to Twinstead Reinforcement 2022 traffic survey data report setting out the methodology of the survey and defining vehicle types; • Excel spreadsheet of traffic movements as submitted by the applicant at D4 [REP4-006]. This has proved helpful to identify accesses with significant use and the intention is to concentrate on analysing these locations; and • Speed survey and traffic volume data (multiple files). Whilst useful it is noted that not all accesses have speed surveys at or adjacent to their location. For example, at Burstall the speed limit survey was undertaken in the built-up area to the south which is subject to a 30mph speed limits and lies between two bends. <p>On 8 December 2023, SCC (LHA) was provided with four AIL reports.</p> <p><u>(ii) State of Play</u></p> <p>The authority awaits further information as set out in D5 [REP5-034].</p> <p>In the hearing, the Applicant made reference to using banksmen or marshals to control traffic. SCC (LHA) would note that unless having the relevant delegated powers, banksmen / marshals cannot control vehicles on the public</p>

	<p>highway. SCC would also advise that once appointed the contractors' views are sought regarding the safety of such controls.</p>	
<p>6.2. The Applicant will be asked to justify its approach (in terms of practicality and minimisation of highway risks):</p>		
	<p>6.2.a. for the proposed bell mouth design [APP-030] and [REP3-005];</p> <p>SCC (LHA) remains to be convinced that a generic bellmouth design in isolation is sufficient to determine the feasibility of an access design and to identify all impacts. Site specific conditions such as existing road width, vegetation, buildings, highway boundaries and vertical profiles can all have significant impacts on the design and deliverability.</p> <p>6.2.b. for not undertaking a Road Safety Audit (RSA) at the Examination stage.</p> <p>SCC (LHA)'s position is that a RSA is required for accesses unless agreed with the LHA, for example for temporary accesses only used for landscaping, environmental surveys and mitigation have low traffic volumes and hence a RSA would be disproportional.</p> <p>SCC notes that stage 1 RSAs were undertaken for the Sunnica and SPR EA1(N) / EA2 projects at examination stage.</p>	
<p>6.3. The Applicant will be asked to further justify its preference for the proposed construction haul road from the A131 rather than a 'hybrid' haul road solution.</p>		
	<p>This is a matter for Essex County Council.</p>	
<p>7 Public rights of way and assessment of construction and traffic impacts on walkers, cyclists and horse riders</p>		

<p>7.1. (i) Data and information shared and (ii) state-of-play of discussions between the Applicant and the local authorities since Issue Specific Hearing 3 (9 November 2023) in relation to public rights of way.</p>	
	<p><u>(i) Data and Information Shared</u></p> <p>SCC (PROW) are awaiting sequencing details from National Grid for Public Rights of Way closures. This matter was raised at previous ISH3 (9 November 2023) and the information has still yet to be provided. Details have further been requested at meetings on 15 November 2023 (followed by email on 15 November 2023) and again at meeting of 29 November 2023.</p> <p>SCC have provided information of examples of ‘good practice’ PROW Management Plans from previous NSIPs to aid the Applicant; these details were provided on 15 November 2023 direct to the Applicant.</p> <p><u>(ii) State of Play</u></p> <p>As above, SCC (PROW) are awaiting information as raised at ISH3 and subsequent meetings. Example of details required were confirmed by email on 15 November 2023.</p>
<p>7.2. Explanation of, and discussion about the Applicant’s Public Rights of Way Management Plan [REP3-056].</p>	
	<p>SCC (PROW) would note that Table 4 (Comments on 8.5.8 PROW Management Plan) of SCC’s <i>Comments on any other submissions received at Deadline 3 [REP4-046]</i> summarises the gaps within the PROW management plan, as outlined below:</p> <ul style="list-style-type: none"> • Community Engagement and Public Information; • Routes with Public Access Affected by the Project; • PRoW Management Signage; • Active Management Plan for ‘Shared Routes’; • Reinstatement of PRoW;

	<ul style="list-style-type: none"> • Change Process; and • Routes with Public Access affected by the project, appendix A. Summary does not include details of sequencing. 	
8 Traffic Management Plans		
8.1. The local highway authorities will be asked to justify the need for a:		
	<p>8.1.a. Detailed Abnormal Indivisible Loads Management Plan</p> <p>In SCC (LHA)’s opinion, the Applicant needs to demonstrate that AILs can access the locations required to deliver this project and hence needs to:</p> <ul style="list-style-type: none"> • Include sufficient information to show that the routes are feasible and that they can be accommodated within their existing highway boundary or order limits; • Identify works required to the highway network to allow for the AIL movements (i.e., street furniture, utilities); and • Demonstrate that there are no restrictions on highway structures that either prevent use buy the anticipated loads or require temporary measures to allow access. This would be a risk-based approach with a process to identify the structures, undertake inspections and reviews where identified, and potentially provide improvements where capacities fall below those required. <p>Whilst welcoming the reports provided by the Applicant, there are some issues that still need to be resolved:</p> <p><u>AIL Routes</u></p> <p>Routing of AILs Cable Drums around the Sudbury area: SCC (LHA) would welcome further discussion particularly with regard to outbound movements which would have to go the wrong way up a short section of one-way street or follow difficult route through the centre of Sudbury. There may be an alternative route for these movements.</p>	

	<p>The Wynns report 21-1030 Bramford Reactors (June 2022) appear to predate a number of highway improvements on the A137 north of Ostrich Creek, at the A14/A137 Wherstead Interchange, on the A1214 and the A12/A1071 junction. The revised layout should be assessed by the haulage contractor and the reports updated.</p> <p>The Wynns reports remark on s59 Highways Act 1980⁴ for damaged caused by extraordinary traffic and recommend reaching early agreement with the highway authority.</p> <p><u>AIL Structures</u></p> <p>The Wynns report 21-1030 Bramford Reactors notes that Suffolk County Council have advised that routes 1 and 2 are affected by a 710 Raw Water Main Culvert which is a structure on the A1214 just north of Copdock Interchange which is currently restricted to STGO 3 vehicles pending further investigations. This is correct and SCC is working with Applicant and Hauliers to resolve this issue.</p> <p>The current structural capacity of is restricted to SV80 (30 HB) Ostrich Creek Bridge on Wherstead Road and it is not suitable for the proposed loads to cross without remedial measures being agreed. In the past this has involved the installation of a temporary deck with significant disruption to local traffic and access to the West Bank dock (see p29 of report 21-1030).</p> <p>SCC (LHA) understands that the Applicant does not intend to move transformers from Ipswich to Bramford as part of this project.</p> <p>With regard to structures on the routes proposed for hauling cable drums, SCC (LHA) is undertaking a review of structures along this route. This information is likely to be available in February 2024.</p> <p>The reports provided by the Applicant go some way to reassuring SCC (LHA) that the above have been considered although the authority still considers that the highway agreement in preparation should include details of the process</p>	
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[https://www.legislation.gov.uk/ukpga/1980/66/section/59#:~:text=59%20Recovery%20of%20expenses%20due%20to%20extraordinary%20traffic.&text=and%20where%20a%20sum%20has,under%20subsection%20\(1\)%20above.](https://www.legislation.gov.uk/ukpga/1980/66/section/59#:~:text=59%20Recovery%20of%20expenses%20due%20to%20extraordinary%20traffic.&text=and%20where%20a%20sum%20has,under%20subsection%20(1)%20above.)

	<p>for engaging with the LHA to facilitating AIL movements (e.g., removing and replacing street furniture) and completing a review to ensure that there are no weak structures that would complicate such moves.</p> <p>8.1.b. Detailed Port Traffic Management Plan</p> <p>The requirement for a Port Traffic Management Plan arose from concerns that significant amounts of material may need to be transported into or out of ports and that these may fall outside extant planning permissions. Reconsidering its position, SCC (LHA) would accept that such a plan is unnecessary for this scheme.</p> <p>8.1.c. Decommissioning Traffic Management Plan</p> <p>SCC (LHA) considers that this would be scoped as part of the discharge of Requirement 12.</p> <p>This is to ensure that any changes to the highway network (such as layout and use) and the environment or ecology are considered. Whilst it is accepted that overall, the impacts of decommissioning are less than construction, it may be the case that the impacts are greater at specific locations, for example if access is restricted over part of the site.</p>	
9 Any Other Business		
	<p>9.1. Stour Valley River Navigation</p> <p>SCC (Planning) have no points to raise in addition to those presented by the Dedham Vale National Landscape Stour Valley Partnership.</p>	
10 Review of Actions Arising		
	<p>10.1. AP2 (Applicant and LHA) By Deadline 6, State whether all parties agree on the peak hour and if not agreed, then what it is perceived to be the peak hour.</p> <p>SCC (LHA) understands that the parties agree that network peak (i.e., the hours at which the baseline traffic flows are at their highest) is 0800-0900 and 1600-1700. The concern is that with the addition of the construction vehicles, particularly during the workers shift changes, these peaks may be displaced to 0700-0800 and 1800-1900 at some</p>	

	<p>locations.</p> <p>10.2. AP4 (Applicant and LHA) By Deadline 6, in Post-Hearing Submissions, to provide summaries in relation to the Environmental Impact Assessments as well as the Transport Assessments, based on IEMA July 2023 guidelines, regarding worst case hour and effects on the community.</p> <p>SCC (LHA) is still in the process of reviewing the July 2023 guidance and so will endeavour to submit this information by Deadline 7.</p> <p>10.3. AP6 (Applicant and LHA) By Deadline 6, in Post-Hearing Submissions, regarding positions on the TA being final (rather than outline) and potential impact of Requirement 2 and what that means if the proposed development commences construction in year five.</p> <p>A delay of 5 years would most likely result in a growth in background traffic although this would be dependent on the economy and other factors. In terms of assessment, this would result in the proportion of construction traffic to baseline traffic decreasing the impacts using the IEMA or LA112 methodology with theoretical small impacts, although total flows could be expected to be higher. SCC (LHA) would perceive the risks of starting in year 5 could be:</p> <ul style="list-style-type: none"> • The pattern of traffic movements changes, for example flattening out and /or displacement of the network peak into hours where workers are travelling; • Additional junctions reach capacity in terms of traffic flows and delays increase; and • The pattern of collisions changes. <p>Of the above, SCC (LHA)'s greatest concern would be an increase in collisions on the network. However, it is not SCC (LHA)'s practice when commenting on development proposals under the TCPA 1990 regime to require a review of any supporting transport assessment simply to reflect changed highway conditions should a development be implemented at the end of its period for commencement rather than at the beginning, and in the circumstances of this project SCC (LHA) sees no reason to take any different position. If the prospect of changed highway conditions is seen to be a concern that should be addressed, SCC (LHA) would see a more effective solution, given the Applicant's emphasis on the need to deliver the proposed development within a short and constrained timescale,</p>	
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	<p>would be to reduce the period for implementation allowed by Requirement 2(1) from 5 years to a shorter period. This could be a period of 3 years.</p> <p>10.4. AP7 (LHA) By Deadline 7, submit relevant highways operational plan inspection, and asset information.</p> <p>SCC Highway Maintenance Operational Plan⁵ (Inspection frequency, definitions and sizes of defects, response times) can be found its associated footnote.</p> <p>SCC Asset Management Policy,⁶ Strategy⁷ and Plan⁸ can be found in their associated footnotes.</p> <p>10.5. AP8 (Suffolk County Council) By Deadline 7, submit updated access information (updated Annex F of LIR), share into the Examination Library.</p> <p>SCC (LHA) includes, in Appendix 1 of this document, an update of its Review of Site Accesses (originating from Annex F of the Suffolk Joint LIR [REP1-044]). This is a work in progress and the authority intends to further refine this document.</p> <p>10.6. AP11 (Suffolk County Council) By Deadline 6/7, provide further relevant information in relation to highway structures on AIL routes.</p> <p>SCC (LHA) will endeavour to submit this information by Deadline 7.</p>	
11 Close of Issue Specific Hearing 6		

⁵ <https://www.suffolk.gov.uk/asset-library/v2.2-hmop-2021-final-live-october-20231.pdf>

⁶ <https://www.suffolk.gov.uk/asset-library/highways-infrastructure-asset-management-policy.pdf>

⁷ <https://www.suffolk.gov.uk/asset-library/highways-infrastructure-asset-management-strategy.pdf>

⁸ <https://www.suffolk.gov.uk/asset-library/hiamp-final-v-1.4.pdf>

Appendix 1 – Updated Review of Site Accesses (Annex F of the Suffolk Joint Local Impact Report [REP1-044])

Access to works reference	Street (1)	Parish	Road No.	Plan Reference (Access, Rights of Way and Public Rights of Navigation Plans)	Existing Conditions							Permanent / Temporary	Construction										SCC Comments	
					Access	Nominal Road Width (2)	Speed Limit	Speed data	Nominal Visibility (3)	On street parking?	Vegetation?		LGV	OGV1	OGV2	AIL	Speed Limit (Schedule 12 Part 1)	Nominal visibility requirement (with TTRO)	Visibility (y) assumed for order limits	Traffic Survey Locations	85%ile	Waiting Restrictions		
AB-AP1	Bullen Lane Access	Bramford	U4421	Sheet 1	private	4.8	60	n/a	215		Yes	Permanent	1391	162	1148								PRoW Footpath not full highway	
AB-AP2A	Burstall Hill (not Church Hill)	Burstall	C726	Sheet 2	field	3.0	60	n/a	215	no	yes	Temporary	676	102	472		30mph	90m				7am-7pm		
AB-AP3	Church Hill				private	4.5	60	n/a	215	no	yes?	Temporary	390	0	692		30mph	90m		LCC44			7am-7pm	Existing farm access with concrete surface
AB-AP4					new	4.4	60	n/a	215	no	yes	Temporary	166	0	292									LCC in centre of village / 30mph limit
AB-AP5					field	3.2	60	n/a	215	no	yes	Temporary	172	0	398									Trees to south
AB-AP2B	Burstall Hill				private	5.4	60	n/a	215	no	yes	Temporary	236	12	168									Private access, kerbed but over-run
AB-AP6	Back Road (not Ipswich Road)	Hintlesham	A1071	Sheet 3	private	5.4	40	n/a	120	no	yes?	Temporary	684	0	1566		30mph	90m		none		7am-7pm	Trees may require trimming. On sharp bend. Secondary access to Hintlesham Hall	
AB-AP7					field	5.7	40	n/a	120	no	no	Temporary	674	0	1212									
AB-EAP1					private	5.4	40	n/a	120	no	yes	Temporary	0	0	0								On bend	
AB-AP8				new	6.0	40	n/a	120	no	no	Temporary	1536	0	1396										
AB-EAP2a				private	7.6	60	n/a	215	no	no	Temporary	0	0	0										
AB-EAP2b	Ipswich Road	Hadleigh			new	7.1	60	n/a	215	no	no	Temporary	0	0	0							May be an access off layby		
AB-DAP1	Hadleigh Road (Not Thorpes Hill)	Burstall	A1071	Sheet 4	field	5.2	60	n/a	215	no	no	Temporary	92	0	48		30mph	90m			none	7am-7pm	Field entrance off private unmade layby	
AB-DAP2	Washbrook Road (not Pigeon's Lane)	Hintlesham	C464	Sheet 4	field	3.9	60	n/a	215	no	no	Temporary	60	0	32		30mph	90m			none	7am-7pm	Restricted turning ban (0700-0900) into this road from A1071	
AB-DAP3					new	3.6	60	n/a	215	no	yes	Temporary	60	0	32		30mph	90m		7am-7pm				
AB-DAP4	Lower Barn Road	Chattisham	U4304	Sheet 5	new	3.6	60	n/a	215	no	yes	Temporary	96	0	64		30mph	90m			none	7am-7pm		
AB-DAP5	Mill Lane (not Chattisham Lane)		U4305		new	3.6	60	n/a	215	no	no?	Temporary	96	0	64		30mph	90m			none	7am-7pm	May be an unauthorised field entrance on junction	
AB-DAP6	Duke Street	Hintlesham	C730	Sheet 7	private	6.0	30	n/a	90	no	no	Temporary	84	0	60		already subject to 30 limit	90m			LCC82	7am-7pm	visibility may be obstructed by wall to south. Track is Hintlesham FP 041	
AB-DAP7	Clay Hill	Hintlesham	C446		field	4.2	30/60	n/a	90/215	no	yes	Temporary	72	0	32		partially subject to 30 limit	90m			None	7am-7pm	immediately adjacent start /end of 30mph limit	
AB-DAP8	Pond Hall	Hintlesham	C730		field	5.0	60	n/a	215	no	yes	Temporary	84	0	44		30mph	90m			LCC39	7am-7pm	Access on Hintlesham FP 044	

AB-AP9	Road	Hadleigh		Sheet 8	private	5.0	60	n/a	215	no	yes	Temporary	96	0	64						Access on Hintlesham FP 046. Access on bend. Signs and utility pole.				
AB-AP11					field	6.1	60	n/a	215	no	yes	Temporary	428	0	636										
AB-AP12					private	6.2	60	n/a	215	no	yes	Temporary	468	0	956										
AB-AP13																									
AB-AP14					new	4.9	60	n/a	215	no	yes	Temporary	236	0	264									Not included in dDCO Schedule 6 Part 2 streets subject to temporary alteration of layout or Schedule 8 access to work	
AB-AP17				Sheet 9	private	6.1	60	n/a	215	no	yes	Temporary	736	0	1140						Bends and dip				
AB-DAP9	Woodlands Road	Raydon	C465	Sheet 8	field	4.4	60	n/a	215	no	yes	Temporary	96	0	64		30mph	90m		None	7am-7pm				
AB-DAP10	Clay Lane	Hadleigh	U4308		new	2.7	60	n/a	215	no	yes	Temporary	64	0	32		30mph	90m		LCC37	7am-7pm				
AB-AP15					new	2.9		n/a		no	yes	Temporary	148	0	178										
AB-AP16					field	3.7		n/a		no	yes	Temporary	1193	0	1472										
C-AP1,	Pipkin Hill (not B1070 (Benton Street))		B1070		new	6.6	40	n/a	160	no	yes	Temporary	1040	0	1148		30mph	90m		LCC34	7am-7pm				
C-AP2,					new	5	40	n/a	160	no	yes	Temporary	660	0	488										
C-DAP1	The Street (not Benton Street)	Layham		Sheet 10	field	4.5	30	n/a	90	no	yes	Temporary	96	0	44		partially subject to 30 limit	90m			7am-7pm	Footway			
C-AP3	Layham Road	Layham	C727	Sheet 10	field	4.9	60	n/a	215	no	yes	Temporary	218	0	308		30mph	90m		LCC33	7am-7pm				
C-AP4					track					no	yes	Temporary	656	0	768										
C-AP5,	Overbury Hall Road	Layham	U8501	Sheet 11	field	3	60	n/a	215	no	yes	Temporary	616	0	552		30mph	90m		LCC32	7am-7pm				
D-AP1					private					no	yes	Temporary	754	0	630										
D-DAP1	Rands Road	Layham	U8503	Sheet 11	field	3	60	n/a	215	no	yes	Temporary	72	0	0		30mph	90m		LCC79	7am-7pm	acute angle towards south			
D-AP2					private	6.2	60		215	no	yes	Temporary	17694	0	19036	STGO/SO						acute angle towards west			
D-DAP2	Millwood Road	Polstead	U8512	Sheet 12	field	3.9	60	n/a	215	no	yes	Permanent	60	0	32		partially subject to 30 limit	90m		LCC28	7am-7pm	Not included in Schedule 6 Part 2 streets subject to temporary alteration of layout			
D-AP3					field?		60	n/a	215	no	yes	Temporary	9360	0	148	LCC28 in village / 30mph limit									
D-AP4					new	60	n/a	215	no	yes	Temporary	9056	0	80											
D-EAP1					highway	3.8	60	n/a	215	no	yes	Temporary	0	0	0	Existing highway junction - U4318 Polstead Road. Not included in Schedule 6 Part 2 streets subject to temporary alteration of layout									
D-AP6	Heath Road	Polstead	U8515	Sheet 12	field	3.8	60	n/a	215	no	yes	Temporary	8750	0	350		partially subject to 30 limit	90m		LCC26	7am-7pm	LCC26 in village not near accesses			
D-AP7					new					no	yes	Temporary	8150	0	30										
D-DAP2A					field	3.9	60	n/a	215	no	yes	Temporary	60	0	32	Polstead FP 33									
D-DAP3					field	3.5	60	n/a	215	no	yes	Temporary	132	0	48	Polstead FP 32									

D-AP8	Holt Road	Polstead	C729	Sheet 13	field	3.8	60	n/a	215	no	yes	Temporary	8150	0	38	30mph	90m		LCC24	7am-7pm	Not included in Schedule 6 Part 2 streets subject to temporary alteration of layout or Schedule 8 access to work				
E-AP1					new					no	yes	Temporary	8150	0	30										
E-DAP1					field					no	no?	Temporary	0	16	0										
E-AP4	White Street Green (not Calais Street)	Polstead	U8545	Sheets 13	new	4	60	n/a	215	no	yes	Temporary	7050	0	0	partially subject to 30 limit	90m		LCC77	7am-7pm	LCC77 within 30mph / village				
E-AP5					new					no	yes	Temporary	7050	0	0										
E-AP6				Sheet 14	field					3.7	60/30	n/a	215/90	no	yes						Temporary	60	0	32	On 30/derestriction limit
E-DAP2					new					no	no	Temporary	0	16	0										
E-DAP3					new					no	yes	Temporary	0	16	0										
E-AP8	Brick Kiln Hill (not Brick Kiln Lane)	Polstead	C731	Sheet 15	private	4.7	60	n/a	215	no	no?	Temporary	84	0	44	30mph	90m		none	7am-7pm	Copella secondary access				
F-DAP1					private					no	yes	Temporary	90	0	32										
E-AP7	Stoke Road	Polstead	B1068	Sheet 15	new	5.8	60	n/a	215	no	yes	Temporary	6100	0	0	partially subject to 30 limit	90m		LCC22	7am-7pm	close proximity to Harrow Lane and access E-DAP4				
F-AP1					new						yes	Temporary	6000	0	0						LCC22 some distance from accesses				
E-DAP4					private track						yes	Temporary	120	0	64						Copella main entrance				
E-DAP5					private access						no	no	Temporary	96	0						52				
BM-1					new						yes	Temporary	0	0	0										
BM-2					new						yes	Temporary	0	0	0										
F-AP4	Stoke Road	Leavenheath	B1068	Sheet 15	field	4.8	60/30	n/a	215/90	no	yes	Permanent	0	0	0					Adjacent to 30 limit / derestriction.					
F-AP5	Nayland Road (not Colchester Road)	Leavenheath	A134	Sheet 15	new	5.5	40	n/a	120	no	yes	Temporary	12550	0	12088	30mph	90m		LCC23	7am-7pm	LC23 some way from access				
F-AP6					new						yes	Temporary	1386	0	1126						STGO/SO				
F-DAP2					field						no	yes	Temporary	60	0						32				
F-AP7	Colchester Road	Assington	A134	Sheet 16	new	5.4	60	n/a	215	no	yes	Temporary	54550	0	27300	30mph	90m			7am-7pm					
F-AP8	Nayland Road (not High Road)	Assington	U8611		new	3.3	60	n/a	215	no	yes	Temporary	708	0	942	30mph	90m		LCC19	7am-7pm	LCC close to junction				
F-AP9					field	3	60	n/a	215	no	yes	Temporary	588	0	720										
F-DAP3	field	no	yes	Temporary	132	0	64																		
F-AP10	Bures Road (not Rose Green)	Assington	C733	Sheet 17	private road	4.8	30	n/a	90	no	yes	Temporary	586	0	544	subject to 30 limit	90m		LCC75	7am-7pm	Junction of The Street, Barracks Road and Bures Road.				
F-DAP4					Temporary	96	0	52																	
F-AP12					new	3.7	30	n/a	90	no	no?	Temporary	328	0	454										
F-DAP5					track	no	yes	Temporary	48	0	20														
F-AP13	new	no	yes	Temporary	320	0	434	partially subject to 30 limit	90m																
F-AP11	Wormingford Road (not Smallbridge Entry)	Assington	U8607		new	2.8	60	n/a	215	no	no	Temporary	60	0	32	30mph	90m		Not available	7am-7pm					
F-AP14	Dorking Tye (not Upper Road)	Assington	U8618	Sheet 17	field	3.9	60	n/a	215	no	yes	Temporary	464	0	562	30mph	90m		LCC17	7am-7pm					
G-AP2					field						yes	Temporary	456	0	992										
G-AP1					hardstand						no	no?	Temporary	696	0						1476				
G-AP3	St Edumnds Hill	Bures St Mary	B1508	Sheet 20	new	4.9	40	n/a	120	no	yes	Permanent	13400	0	4662	30mph	90m		LCC15	7am-7pm	dDCO Schedule 6 Part 1 and Part 2 places these accesses in Essex.				
G-AP4					new						yes	Temporary	13400	0	8386							SO /			

