



Suffolk County Council (20041323)

**Response to the Action Point 4 arising from
ISH6**

Bramford to Twinstead (EN020002)

Deadline 8

9 February 2024

Table of Contents

Glossary of Acronyms 2

Purpose of this Submission..... 2

1 Response to Action Points from Issue Specific Hearing 6 3

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. 3

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 Highway 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 further information requested by the Examining Authority under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010. In this instance, to provide a further substantial response to action point 4 arising from ISH6. Action Points arising from ISH5 can be found documented in the ExA’s record of Action Points from ISH5 on the dDCO **[EV-045a]** and those for ISH6 can be found documented in SCC’s post-hearing submission for ISH6 **[REP6-057]**. Examination Library references are used throughout to assist readers.

1 Response to Action Point 4 from Issue Specific Hearing 6

- 1.1 SCC (Planning) notes that Issue Specific Hearing 6 focused on Access, Transport, and Public Rights of Way. SCC provided its post-hearing submission at Deadline 6 [REP6-057].
- 1.2 SCC responded to AP2, AP6, AP7, and AP8 in its post-hearing submission for ISH6 [REP6-057] and AP11 in its Deadline 7 Submission on Action Points arising from ISH5 and ISH6 [REP7-032].

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.

- 1.2. SCC (LHA) notes that the changes in the 2023 IEMA Guidance are that it recognises DMRB guidance for transport schemes and that some elements such as Population and Human Health may have relevance to assessment of non-highway schemes. It also outlines level of competence for experts assessing environmental impacts. Table 1 outlines the changes as SCC perceives them and their relevance to the project.

Table 1: Comparison of Environmental Assessment between 1993 and 2023 IEMA Guidance and the Application

IEMA Guidelines for the Environmental Assessment of Road Traffic 1993	IEMA Environmental Assessment of Traffic and Movement 2023	Bramford to Twinstead Environmental Assessment	
Air Pollution	(Air quality) ¹	Air Pollution	ES Chapter 13 [APP-081]
Noise	(Noise) ¹	Noise Vibration	ES Chapter 14 [APP-082]
Vibration	(Vibration) ¹		
Visual Effects	(Landscape and visual) ¹	Landscape and Visual	ES Chapter 6 [APP-074]
	(Biodiversity) ¹	Biodiversity	ES Chapter 7 [APP-075]
	(Cultural heritage) ¹	Historic Environment	ES Chapter 8 [APP-076]
	(Climate resilience) ¹		
Severance	Severance	Traffic and Transport ⁴	ES Chapter 12 [APP-080]
Driver Delay	Driver Delay	Junction Assessments	Transport Assessment [APP-061]
Pedestrian Delay	Pedestrian Delay (incorporating all NMU)	Traffic and Transport ⁴	ES Chapter 12 [APP-080]

Pedestrian Amenity	Non Motorised User Amenity		
Fear and Intimidation	Fear and Intimidation ²		
Accidents and Safety	Road Safety ³	Road Network Performance and Safety	Transport Assessment [APP-061]
Hazardous Loads	Hazardous loads / large loads		
<p>Footnotes</p> <p>1: Linked to other assessments</p> <p>2: Includes tables to quantify degree, level and magnitude of impact</p> <p>3: Road Safety Audits should be used to review the road safety attributes of any proposed engineering changes in the adopted highway prior to submission.</p> <p>4: For walking, cycling and horse riders (WCH). Assessment based on DMRB LA112</p>			

1.3 Other than those matters noted above, as SCC perceives, the key change is the widening of the assessment to include all non-motorised users, not just pedestrians.

1.4 IEMA 2023 continues with the two key rules:

1.4.a Rule 1 **Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and**

1.4.b Rule 2 Include highway links of high sensitivity where traffic flows have increased by 10% or more.

1.5 The guidance still refers to Department for Transport MEA guidance where, historically, has assumed that 30%, 60% and 90% changes in traffic levels should be considered as ‘slight’, ‘moderate’ and ‘substantial’ impacts respectively. Also quantifies the increase in HGVs in rule one which stated ‘where there are major changes in the composition of the traffic flow, say a much greater flow of HGS, a lower threshold may be appropriate.

1.6 Tables 3.1, 3.2 and 3.3 of the 2023 IEMA guidance provide an example methodology to assess fear and intimidation. It would be helpful if this could be undertaken for selected sites, specifically the A1071 in Hintlesham and A134 Nayland and Leavenheath.