



## **Suffolk County Council (20041323)**

Comments on any other submissions received  
at Deadline 7

## **Bramford to Twinstead (EN020002)**

Deadline 8

9 February 2024

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## Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Orders</i>
<i>DVNLSP</i>	<i>Dedham Vale National Landscape and Stour Valley Partnership</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 responses to the Applicant’s Deadline 7 (D7) submissions and representations made by other interested parties at D7, as appropriate. Examination Library references are used throughout to assist readers.

## 1 Comments on any other submissions received at Deadline 7

### 7.8 (C) Landscape and Ecological Management plan (Clean) [REP7-006]

<b>Table 1: SCC Table of Comments on 7.8 (C) Landscape and Ecological Management plan (Clean) [REP7-006]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC's Comments</b>
1a	Overall			<p>SCC (Landscape) welcomes the positive changes that have been made to the proposed LEMP.</p> <p>However, SCC's position remains unchanged that this document is not suitable to be the final control document and that detailed and finalised LEMPs should be agreed with the relevant planning authority post consent.</p>
1b	Objectives	1.3.2		<p>The LEMP does not meet all its objectives:</p> <ul style="list-style-type: none"> <li>- It does not provide clear account of the vegetation that will be affected and does not provide quantifications that can be understood in layman's terms (lack of transparency).</li> <li>- It does not provide a single document reference for all ecological mitigation considerations on site; proposed areas for net gain are greyed out areas on the vegetation Reinstatement Plan, with no reference other than to the Environmental Gain Report (no identification labels on plan)</li> <li>- It does not provide a secure mechanism to avoid, reduce or compensate environmental effects, as it does not provide a post consent mechanism to re-assess the vegetation losses based on the Rochdale Envelope and does not award sufficient control to the</li> </ul>

				relevant planning authorities to carry out their duties.
1c	Pre-construction walkover	2.5.6		SCC (Landscape) considers that the walk over should also include the presence of a Landscape Architect and of a representative of the relevant local authority.
1d	Project Responsibilities	3.2.3 and Table3.1		SCC welcomes that the EnvCoW will seek advice from specialists including a landscape architect.
1e		5.1.3		Should read: Babergh and Mid Suffolk Joint Local Plan
1f	Main Land Uses	5.2.3-5.2.5		SCC (Landscape) welcomes the listing and short introduction of the county landscape character types, with reference where further information can be found.
1g	Embedded Measure EM-G14	Page 37		SCC (Landscape) welcomes the involvement of a landscape architect at the Stour Valley East CSE compound to finalise the design; However, SCC considers that a landscape architect should be involved throughout the DCO area with the same purpose.
1h	Woodland and Tree Removal	7.2.1		The coppicing of a 45m swathe does seem excessive and not in line with the following paragraphs and illustration 7.1 – Sketch of 400kV Overhead Line Construction Within Woodland With an Existing Maintained Swathe. SCC queries if this is an error and should be corrected, so that coppiced swathes and graduated cutting back vegetation is consistent and does not exceed 45m in total.
1i	Biodiversity metric	8.2.7		When the Applicant is re-running the final Biodiversity calculations, SCC would ask that the up-to date statutory metric is used for the calculations.

1j	Natural Regeneration of Woodland	8.4.12		The measure described here would be counter-productive to the regeneration goals. SCC (landscape) considers that this paragraph needs to be removed.
1k	Aftercare	9.1.2		<p>SCC (Landscape) considers that five years aftercare is no longer sufficient to establish all types of planting. It is certainly not long enough to establish tree and woodlands, SCC instead promotes a period of aftercare of five years for hedges, ten years for trees and fifteen years for woodland as indicated in the Host Authorities' LEMP Document Review <b>[REP5-035]</b>.</p> <p>It should be considered by the applicant that any mitigation planting that fails, even after five years, will reduce the achieved Biodiversity Net Gain.</p>
1l		9.1.3		<p>The term 'periodic' is too vague. Inspections should be carried out annually, at least for the first five years.</p> <p>SCC (Landscape) expects that a representative of the local authority is present at the inspections and that the applicant enables and facilitates this. Remedial measures need to be agreed with the relevant local authority. While copies of inspection reports are part of this process, they are not acceptable on their own.</p> <p>This provision is wholly unacceptable, as it gives the relevant local authority no control to secure successful mitigation.</p>
1m		9.1.5		SCC (Landscape) expects that a representative of the local authority is present at the final inspection and that the applicant enables and facilitates this. Remedial measures need to be agreed with the relevant local authority. While the provision of a copy of the final inspection report

				<p>forms part of this process, it is not acceptable on its own.</p> <p>This provision is wholly unacceptable, as it gives the relevant local authority no control to secure successful mitigation.</p>
1n		9.2.1		<ul style="list-style-type: none"> <li>- How often will plants be inspected, re-firmed and stakes, guards and ties adjusted?</li> <li>- When is it envisaged to remove stakes, guards, and ties?</li> </ul> <p>Tree watering: what frequency and quantities are envisaged? What type of vehicle will require access to reach the trees? Which access route will these vehicles use?</p>
1o		9.1.5		<p>SCC (Landscape) expects that a representative of the local authority is present at the final inspection and that the applicant enables and facilitates this. Remedial measures need to be agreed with the relevant local authority. While the provision of a copy of the final inspection report forms part of this process, it is not acceptable on its own.</p> <p>This provision is wholly unacceptable, as it gives the relevant local authority no control to secure successful mitigation.</p>
1p	Implementation of the LEMP	10.1.2		<p>Briefings of relevant staff are required prior to pr-e commencement works, with regards to tree protection and minimisation of vegetation losses.</p>
1q	Site Checks, Reporting and Monitoring	10.2-10.4		<p>10.2.1 The comparison of (photographic and descriptive) existing baseline condition surveys and post construction and implementation surveys and reports will need to be submitted to the relevant discharging local authority.</p>

				<p>10.3 A representative of the relevant discharging local authority should be present at monitoring site inspections, and this should be enabled and facilitated by the Applicant. Adaptive measures need to be agreed with the relevant discharging authority.</p> <p>SCC (Landscape) considers that the provision of necessary post-consent control mechanisms for the relevant discharging local authorities is wholly inadequate and not acceptable.</p>
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7.8.1 (B) LEMP Appendix A – Vegetation Retention and Removal Plan [REP7-008]

Table 2: SCC Table of Comments on 7.81 (B): LEMP Appendix A – Vegetation Retention and Removal Plan [REP7-008]				
Ref	Topic	Ref No.	Summary of Comments	SCC’s Comments
2a	Overall			<p>It does not appear that the revised Vegetation Retention and Removal Plan is substantially different from its previous iteration.</p> <p>Following several site visits, there is concern about the presentation of potentially affected vegetation. The combination of hedgerows and treelines into one category (shown as a linear feature), ignores that some of the trees within hedgerows are mature specimen trees, rather than overgrown large shrubs. This has the effect, that the vegetation losses appear less severe on paper than they are in reality.</p> <p>(Examples: Sheet 02, corner, north of Rose Cottage, where the hedge contains several mature oaks; Sheet 11, Rands Road, field access, where a tree that requires removing has not been mapped; Sheet 15 between H-E-16 and H-E-01, a track with mature hedgerows either side and containing several mature specimen trees that should be awarded the same protection as the trees south-east of this section of the corridor.)</p> <p>Combined with the persisting inconsistencies between the plans and the written documents, this causes concern as to whether the losses of vegetation have been adequately captured and quantified.</p>



2b	EM-AB16, p.34 of LEMP	Sheet 06		Still shown on Sheet 10 to be topsoil stripped, while LEMP states that it will not be stripped, to avoid impact to the root protection area of the ancient woodland of Keeble Grove.
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7.8.2 (C) LEMP Appendix B – Vegetation Reinstatement Plan [REP7-009]

<b>Table 3: SCC Table of Comments on 7.8.2.(C) LEMP Appendix B – Vegetation Reinstatement Plan [REP7-009]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC’s Comments</b>
3a	Overall			SCC (Landscape) welcomes the additional planting the Applicant has agreed to around CSE compounds. However, SCC (Landscape) considers that the Applicant is still taking a minimalist and mechanical approach to mitigative planting and the proposals do not provide the strategic approach to mitigation planting and landscape restoration the Councils have asked for from the beginning (LIR [REP1-045])
3b	Dedham Vale East CSE compound at Polstead, Sheet 12			While the proposed hedgerow reinforcement along Millwood Road is welcome in landscape terms, this may not be achievable because of the visibility splay requirements for the proposed permanent access. The existing hedge may need to be partially or fully removed; a new hedge may need to be planted behind the existing hedge, outside the visibility splays.

7.8.3 (B) LEMP Appendix C – Planting Schedules (Clean) [REP7-010]

Table 4: SCC Table of Comments on 7.8.3 (B): LEMP Appendix C – Planting Schedules (Clean) [REP7-010]				
Ref	Topic	Ref No.	Summary of Comments	SCC’s Comments
4a	Overall			<p>SCC (Landscape) welcomes the changes made by the Applicant to the selection of species, their percentages within the various mixes, and their sizes. There is still concern that some of the tree species are proposed at a size that will be difficult to establish, which may be justifiable in key locations, but would require appropriate, intensified aftercare, which the LEMP currently does not allow for.</p> <p>SCC (Landscape) welcomes the statement in paragraph 8.2.1 of the LEMP that the planting schedules can be fine-tuned in discussion with the relevant planning authorities in accordance with the discharge of Requirement 9 of the draft DCO (application document 3.1) (LEMP [REP7-006]).</p> <p>However, this firstly does not go far enough, and SCC considers that the palette presented in the Planting Schedules should be fine-tuned and agreed with the relevant discharging authorities (not simply discussed). Secondly, an equivalent statement should be included in the Introduction to the Planting Schedules in paragraph 1.2.1. to make clear that these planting palettes are a guide, which may be subject to changes to allow a response to specific conditions and requirements of the various localities within the scheme.</p>

8.8.6 (B) Applicant’s Response to Interested Party Comments on Management Plans [REP7-023]

<b>Table 5: 8.8.6 (B): Applicant’s Response to Interested Party Comments on Management Plans [REP7-023]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC’s Comments</b>
5a	Construction Traffic Management Plan	Section 3		SCC (LHA) has considered the information presented and considers that revisions made at Deadline 7 are minor and do not require specific comments above what has been rehearsed in previous submissions at D6 [REP6-057] [REP6-059].
5b	Landscape and Ecological Management Plan	Section 4		SCC (Landscape) maintains its position, as outlined in [REP4-008], [REP5-035], [REP6-054] and [REP6-055].
5c	Landscape and Ecological Management Plan	Table 4.1 Prototype LEMP		While SCC (Landscape) welcomes Requirement 9 of the draft DCO [REP6-003], this alone does not reassure the Council that satisfactory outcomes can be achieved. This is, because as schemes as are proposed to be discharged by the relevant local authority under Requirement 9, would need to be closely aligned to the outline plans, which are currently considered by the Council to be insufficient.

8.9.4 (A) Applicant’s Comments on Other Submissions Received at Deadline 6 [REP7-026]

<b>Table 6: SCC Table of Comments on 8.9.4: Applicant’s Comments on Other Submissions Received at Deadline 6 [REP7-026]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC’s Comments</b>
6a	Compensation for Landscape and Visual Effects	2.2	<p>This section responds to submissions made at Deadline 6 in relation to the comments received on compensation for landscape and visual effects. Suffolk County Council maintains its position that all adverse landscape and visual impacts should be considered National Grid   January 2024   Bramford to Twinstead Reinforcement 6 in the context of the mitigation hierarchy; to see to what extent it is possible to avoid them, reduce them, mitigate them, or compensate for them, in that order. Similar comments are made by BMSDC. The Applicant has responded to this matter in Table 2.1 (ref 5.8, pages 47 to 49) of the Applicant’s Comments on Other Submissions Received at Deadline 4 [REP5-025].</p> <p>Suffolk County Council also maintains that an accumulation of non-significant effects can lead to an overall significance, which SCC considers is the case for some</p>	<p>SCC (Landscape) maintains its position, as outlined in [REP4-008], [REP5-035], [REP6-054] and [REP6-055].</p>

			<p>elements of the project, for example around Bramford and Burstall. The Applicant has undertaken an intra-project cumulative effects assessment, as presented in ES Chapter 15: Cumulative Effects Assessment <b>[APP-083]</b> and as supported by ES Appendix 15.2: Intra-project Cumulative Effects <b>Matrix [APP-144]</b>, which considers the in-combination effects of the project where a receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development. Paragraph 15.10.1 of ES Chapter 15: Cumulative Effects Assessment <b>[APP-083]</b> concludes that there are no likely significant intra-project cumulative effects during construction or operation of the project. The ES has been produced in line with all applicable legislation and guidance, which specifies how individual effects should be considered cumulatively, and the Applicant is confident that the assessment of effects is robust.</p>	
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6b	Sufficiency of Visual Mitigation	2.3		<p>SCC (Landscape) maintains its position, as outlined in <b>[REP4-008]</b>, <b>[REP5-035]</b>, <b>[REP6-054]</b> and <b>[REP6-055]</b>, that the provided mitigation is inadequate.</p>
6c	Traffic and Transport: Access Points, Bellmouths and Temporary Access Routes	2.8.26	<p>The LHA is the authority with the responsibility for the discharge of Requirement 11 and has the authority to take a decision on whether the access designs are safe and appropriate. The project delivery is urgent and it is in the Applicant’s interests for requirements to be determined as quickly as possible, which is likely to involve working with the LHAs to design accesses appropriate for their use and context. The Applicant notes the wider concern expressed by the LHA regarding the potential for a substandard layout to be pursued if constraints prevent a compliant solution. <i>However, the LHA would have the authority to request an alternative layout if the solution was not considered appropriate and in this context the concern does not seem well founded.</i></p>	<p>SCC (LHA) would note that the concerns it raises are that a solution is achievable within the highway and order limits and that the applicant is content that there remains a risk that as LHA, SCC may for specific locations refuse to discharge requirement 11 if no safe solution can be found.</p> <p>SCC (LHA) welcomes the Applicant’s recognition that when considering proposals for put forward for approval under Requirement 11 it would be open to the LHA to request an alternative layout. However, SCC considers that the position of the LHA needs to be stronger than simply an ability to ‘request’ an alternative. The LHA needs the ability and the authority to refuse proposals it considers are unacceptable, whether or not an alternative solution is available.</p> <p>In its comments (above) on the Applicant’s document Temporary and Permanent Access Technical Note –Suffolk County Council <b>[REP7-027]</b>, SCC has put forward a suggested addition to Requirement 11 to make it clear that the LHA has the authority to refuse to approve proposals under Requirement 11 that it deems to be unacceptable, irrespective of any alternative solutions.</p>

6d		2.8.32	<p>The Applicant has confirmed at ISH6, as detailed in Applicant’s Written Summaries of Oral Submissions to Issue Specific Hearing 6 <b>[REP6-043]</b>, that it agreed ‘to undertake high level analysis of collision data on the routes identified by Suffolk County Council, with the Council due to confirm the list of locations at Deadline 6. The Applicant recognised there are injury clusters at these locations and will, once full STAT19 road traffic collision data has been received, analyse the extent to which traffic related to the scheme may or may not impact upon collisions at these locations.’</p>	<p>SCC (LHA) would emphasise that It is unlikely that the examination timetable will allow time for SCC to comment on this.</p>
6e	Applicant’s Specific Comments on the Submission from Suffolk County Council	3		<p>SCC (LHA) has considered the information provided and has no further comments in addition to those covered in previous submissions <b>[REP4-008]</b>, <b>[REP4-021]</b>, <b>[REP4-033]</b>, <b>[REP4-039]</b>, <b>[REP6-056]</b>.</p> <p>Previously, SCC (LHA) had committed to reviewing Schedule 12 of the draft Development Consent Order, however, due to the numerous NSIPs at various stages of the process in Suffolk, staff availability has not been permitting. Separately, SCC considers that it is the Applicant’s responsibility to ensure that the project is acceptable, in this case by checking the schedules against publicly available street gazetteer.</p>



6f	D. Responses to Comments on the Local Impact Report <b>[REP4-008]</b>	6f Hedgerows		SCC (Landscape) maintains its position as outlined in <b>[REP4-008]</b> , <b>[REP5-035]</b> , <b>[REP6-054]</b> and <b>[REP6-055]</b> .
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8.9.5 (A) Temporary and Permanent Access Technical Note – Suffolk County Council (Clean) [REP7-027]

1.1 SCC conducted a site visit on 20 December 2023 and attended a further site visit with the Applicant on 18 January 2024, which have informed the comments below. A small portion of the site accesses listed in the Table below are not explored in more detail in this technical note, however, they are of major concern in landscape or highway terms.

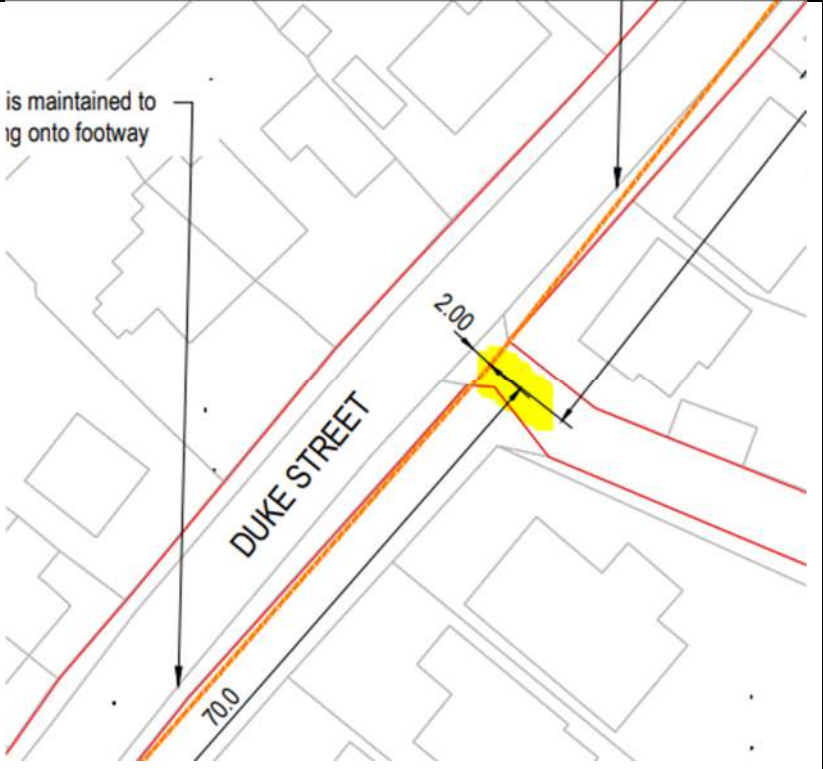
<b>Table 7: SCC Table of Comments on the Temporary and Permanent Access Technical Note [REP7-027]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC's Comments</b>
7a	Introduction to Access Requirements	1.1.3	Application of standard bellmouth access layouts as set out in APP-030. <i>'Therefore, it is the Applicant's view that developing large bellmouths and undertaking major road improvements for temporary accesses would be disproportionate and would adversely affect the character of the rural road network. Access proposals should be considered in this context'.</i>	It is unclear what the applicant defines as 'large' bellmouths. SCC notes that the layout as set out in [APP-030] does not specify dimensions. Similarly, the Design and Layout Plans: Temporary Bellmouth for Access [REP3-005] shows no dimensions and includes an annotation for the bellmouth that the 'Width to suit access requirement'. Therefore, SCC cannot comment on the appropriateness of each individual access, for example that it is of sufficient width to allow two HGVs to pass if the volume of construction traffic makes this necessary. Nor can comments be made on construction impacts such as damage to tree roots.
7b	Design Information Provided in the DCO Application	1.2.3	Subsequent control by LHA: <i>'Requirement 11 provides reassurance to LHAs that detailed designs would be developed, audits carried out to confirm safety and that LHAs would ultimately have the power to approve those designs (or not if they are not deemed acceptable).'</i>	SCC welcomes the fact that the Applicant intends that Requirement 11 should operate to as to allow the LHA to refuse to approve an unacceptable access design. SCC agrees that the LHA should have that ability. However, the problem that the Applicant has not grappled with is that the red line for the DCO is fixed at this stage and yet the access designs are generic and it has not been demonstrated on a site by site basis that a suitable design can be achieved within the red line of the Order limits or land forming part of the highway. The concern that

				<p>SCC has is that once the DCO has been made, any applications coming forward for approval under Requirement 11 will be confined to works within the red line and/or works within the limits of the existing highway and the Applicant will argue that it has no power to do works on any other land. If SCC as LHA refuses to approve an access because what is proposed is unacceptable, whether for reasons of safety or visibility or loss of vegetation of nature conservation/landscape/cultural heritage value, the Applicant may seek to challenge that refusal on the basis that what has been proposed is the best that can be achieved within the confines of the powers given by the DCO. SCC raised this issue in its Post Hearing Submissions following ISH1 [REP1-043] at item 5.3, including reference to the <u>Proberun</u> case, and SCC has not seen any satisfactory response to its concerns from the Applicant.</p> <p>To move matters forward and to ensure that Requirement 11 does give SCC as LHA an unconstrained ability to refuse to give approval to any access that it deems to be unacceptable, (which is what the Applicant states is intended), SCC suggests that the Requirement should be revised as follows:</p> <p>Add new sub-paragraph 11(5):</p> <p><i>‘For the avoidance of doubt, when considering any proposals submitted for approval under sub-paragraph (1), the relevant highway authority shall be entitled to deem those proposals to be not acceptable and to withhold approval irrespective of whether the Applicant can provide any alternative access arrangement that the local highway authority deems to be</i></p>
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				<i>acceptable within the limits of any land currently controlled by the Applicant or land forming part of the maintainable highway.'</i>
7c	Purpose of this Technical Note	1.3.5	<p>There are a large number of tools at the Applicant’s disposal to deliver appropriate accesses and different solutions would be sought at different accesses; these include:</p> <ul style="list-style-type: none"> <li>• Improving the physical design of the access and/ or creating a new access with improved bellmouths and visibility;</li> <li>• Speed restrictions to temporarily reduce the speed of vehicles along the road;</li> <li>• Traffic management including road closures and temporary traffic signals; Temporary traffic regulation orders, a number of which have been listed in the draft DCO, and additional orders which could be sought if required;</li> <li>• Management of construction vehicles (type, number, arrival</li> </ul>	<ul style="list-style-type: none"> <li>• Improved bellmouths – see above.</li> <li>• Speed limits and traffic management are only proposed to be temporary in the construction phase and would not be available for permanent accesses used in the operational phase. Whilst the volume of use may be low and / or intermittent such junctions must be designed to appropriate standards. Traffic management which involves stopping opposing flows of traffic is only practical on roads that have space for the vehicles to pass each other (for HGVs nominally a minimum 5.5m at low speed).</li> <li>• Removal of vegetation on private land not within the order limits would need the landowners permission. At this stage this cannot be taken as granted.</li> <li>• SCC would agree that there is scope to rationalise the number of accesses (see below).</li> </ul>

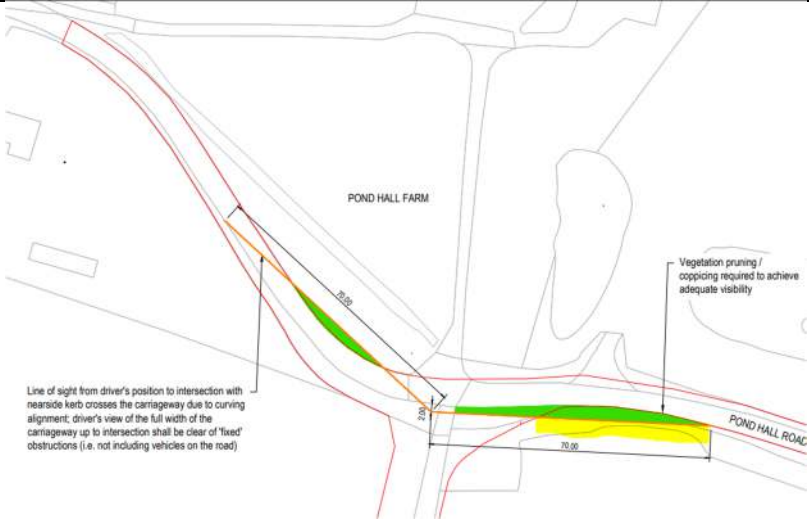
			<p>times);</p> <ul style="list-style-type: none"> <li>• Additional vegetation removal on highways or private land;</li> <li>• Banksman operation, whereby a works employee assists the driver of a works vehicle entering or leaving the site; and</li> <li>• Use of alternative accesses and/or of a temporary access route along the order limits where the above measures cannot result in an suitable access at the point depicted in the plans.</li> </ul>	
7d	AB-AP5: Church Hill, north of Burstall			<p>SCC (LHA) visited this location during a site visit. Its observations noted that to obtain 90m visibility to the south it estimated that a few immature saplings in form of the hedge will require removal and the majority of the hedge cut back close to the stems and potentially a number of trees. This hedge is not considered to be within the highway limits, nor the order limits. Construction of the bellmouth will also require removal of immature trees to the south and temporary culverting of a ditch to the north.</p> <p>SCC (Landscape) notes that the alternative AB-AP4 at first appears preferable in landscape terms; however, it would</p>

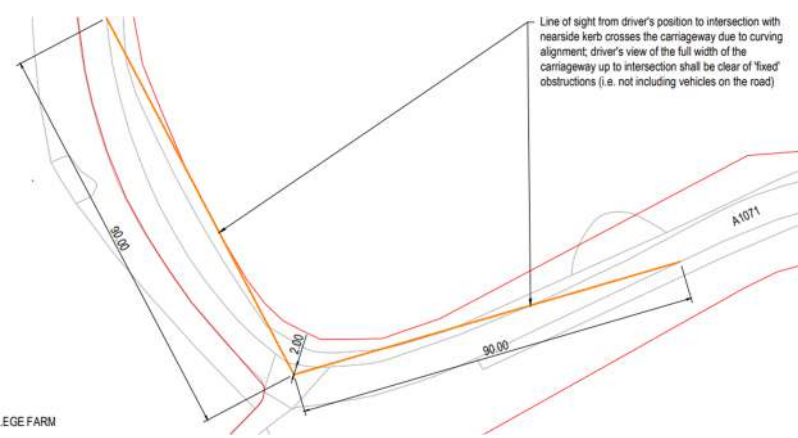
				require removal of a considerable stretch of important hedgerow (H-AB-077). The loss of vegetation at AB-AP5 could include the loss of trees (the hedgerow at AB-AP5 is not clearly identified).
7e	AB-AP4			SCC (LHA) notes that to obtain a minimum visibility splay of 90m a significant length of hedge either side will require coppicing. An area to the north is likely to fall outside the limits of the highway or order limits.
7f	AB-AP3			SCC (LHA) notes that to obtain a minimum visibility splay of 90m a significant length of hedge either side will require coppicing.
7g	AB-DAP6: Duke Street, Hintlesham			<p>SCC (LHA) notes that to obtain the necessary visibility it is likely that the private hedge to the north of the access will require trimming. The order limits seem to exclude the driveway to the north and therefore it would appear difficult to deliver a bellmouth as shown in <b>[APP-030]</b> particularly as the order limits are restricted immediately adjacent to the highway as shown in drawing B2441B04-JAC-TE-B2T-APVS-ABDAP6-001 in <b>[REP7-027]</b>.</p> <p>A swept path analysis would be necessary to confirm that vehicles can enter and exit within the order limits.</p>

				 <p>is maintained to ig onto footway</p> <p>70.0</p> <p>2.00</p> <p>DUKE STREET</p> <p>SCC (Landscape) notes that this appears acceptable in landscape terms, if replaced as required.</p>
7h	AB-AP9: Pond Hall Road, west of Clay Hill			<p>SCC (LHA) notes that the visibility to the west appears adequate but it is difficult to determine if that to the west can be obtained without trimming hedges on the inside of the bend.</p> <p>The applicant notes ([REP7-027] 2.3.4) SCC’s concerns regarding the presence of a utility post and highway (bend) signs. The matter raised was not specifically in regard to</p>


				<p>visibility but their proximity to the proposed access and the potential need to relocate them to enable the construction of the proposed access. The road signs are present to warn drivers of the bend and therefore must be preserved.</p> <p>SCC (Landscape) has concerns about mature trees on north side of Pond Hall Lane, west of the access; these do not seem to have been assessed: there is no vegetation shown on the Vegetation Retention and Removal Plan <b>[REP7-008]</b>, nor on the AIA plan <b>[REP1-011]</b>.</p>
7i	AB-AP17: Pond Hall Road, south of Pond Hall Farm			<p>SCC (LHA) notes that to obtain visibility significant vegetation is required to the east. Additional removal may be needed to provide visibility for traffic management signs. SCC notes that some of the vegetation clearance is outside the order limits (<b>[REP7-027]</b> 2.4.4) and highlighted in the extract from drawing B2441B04-JAC-TE-B2T-APVS-ABAP17-001.</p>



				 <p>Line of sight from driver's position to intersection with nearside kerb crosses the carriageway due to curving alignment; driver's view of the full width of the carriageway up to intersection shall be clear of 'fixed' obstructions (i.e. not including vehicles on the road)</p> <p>Vegetation pruning / coppicing required to achieve adequate visibility</p> <p>SCC (Landscape) notes that the AIA records no trees at the access point within the order limits; the Vegetation Retention and Removal Plan shows 'hedgerow/line of trees to be removed' ; the Technical Note talks about pruning vegetation within and removing vegetation outside the DCO without further specifying the vegetation outside the DCO; hedges H-AB-07 and H-AB-08 which would be affected by removal and coppicing are both Important Hedgerow under the regulations; LOT-ab-20 and LOT-AB21, which are groups of trees are also to be pruned. Either side of the proposed access there appear to be early mature oaks.</p>
7j	AB-EAP1: A1071 College Farm; (sheet 3)			<p>Visibility is OK. Very low construction traffic numbers.</p> <p>SCC (LHA) is somewhat bemused that the visibility splays are show drawn from the centre of the A1071 ([REP7-027] Drawing</p>

				<p>B2441B04-JAC-TE-B2T-APVS-ABEAP1-001). This is not standard practice.</p>  <p>SCC (Landscape) emphasises that the young oak north-east of access should remain unaffected, as well as single tree on the inside of the curve of A1071, north of access point.</p> <p>The AIA appears not to have captured all trees in the area and it is unclear which is T29 (category U) in AIA.</p> <p>It is unclear which environmental area is being accessed from here and whether PRow-318/052/0 will be used. There is further – unassessed - vegetation along the south of the PRow, which might be affected, if this route is used.</p>
7k	D-AP1: Overbury Hall Road,			<p>SCC (LHA) visited this location on a site visit. Its observations noted that the west site has adequate visibility with some hedge trimming. On the east side (C-AP5) significant length of hedge would need to be removed to provide access for a</p>

	Layham (sheet 11)			<p>junction together with relocation of a gate and scrub / bramble removal to the south. Much of this could be reducing if instead of accesses, the location is treated as a crossing point with suitable traffic management - although some hedge removal to the north of C-AP5 would still be required.</p> <p>SCC (LHA) notes that the visibility for C-AP5 is not shown on drawing B2441B04-JAC-TE-B2T-APVS-DAP1-001 <b>[REP7-027]</b>.</p> <p>SCC (Landscape) notes that this is acceptable in landscape terms, provided it is only pruning to hedges and the exiting hedgerow trees further north along Overbury Hall Road are not affected.</p> <p>It is unclear why the existing important hedgerow H-D-20, has to be coppiced (Vegetation Retention and Removal Plan), as access appears wide and unimpeded. Is this a maintenance requirement for the existing powerline?</p>
7l	D-DAP1: Rands Road, Layham (sheet 11)			<p>SCC (LHA) visited this location on a site visit. Its observations noted that the access has a utility post and large oak tree immediately to the west of the access which would require removal of both for construction of bellmouth. Tree hedge removal will be required to the west of the access, and it is noted that these are outside the highway boundary and order limits. Due to the acute angle of track, it is difficult to see how access even by vans can be achieved from the west. It is understood that access will only require for scaffolding across the road. However, it may be more appropriate to close the</p>

				<p>road to allow for scaffolding to erected / removed from the road.</p> <p>SCC (LHA) notes that in drawing B2441B04-JAC-TE-B2T-APVS-DDAP1-001 <b>[REP7-027]</b> the 2m set back appears to be draw within the carriageway.</p>  <p>SCC (Landscape) would very much prefer the option of temporary road closure over creating suitable visibility splays, resulting in significant vegetation losses.</p> <p>It is not clear from the plans which mature tree the technical note refers to as requiring removal for the bell mouth, as no tree is shown to be removed on the Vegetation Retention and</p>
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				<p>Removal Plan. It appears that the Vegetation Retention and Removal Plan has not accurately captured the roadside vegetation along Rands Road, within and also outside the DCO limits, leading to concerns with regards to additional vegetation losses that to date have not been accounted for. In this location, such losses could lead to a significant long-term adverse change in character of Rands Road. During a site visit, carried out on 31 January 2024, a mature tree was located that would need to be removed to create an access here. Beyond that it is likely that vegetation either side of Rands Road would need to be pruned or coppiced to enable access for vehicles. This access route should be queried, and alternatives sought.</p>
7m	F-AP10: The Street, Assington (field access);			<p>SCC (LHA) visited this location on a site visit. Its observations noted that although the location lays within the 20mph limit, the access is close to the change to 30mph. Therefore, provision of adequate will require removal or coppicing of a section of hedge to the south. It was noted that vehicles have been over-running the verge at this location and may also do so where the dropped kerb mentioned in <b>[REP7-027]</b> 2.9.5.</p> <p>SCC (Landscape) considers that the proposed bellmouth would affect existing hedges, the one along the western side of PRow W-113/006/0, H-F-11 being an Important Hedgerow. The hedge on the eastern side of the PRow is part of a private curtilage which, although closely clipped, overhangs into highway land. While this conifer hedge would be responsive to light pruning,</p>

				<p>more severe pruning, as may be required here, may cause irreparable damage to the hedge.</p> <p>Overall, the proposals for the access point require careful management during the construction and reinstatement process to be acceptable in landscape terms. Along The Street along Pump Farm pruning of several hedgerow trees are expected to be required (shown on Vegetation Retention and removal Plan a hedge or treeline to be pruned).</p> <p>It is noted, however, that there is a young mature oak further north along The Street (western side), presumable just outside the DCO limits, which has not been assessed, but could be impacted by the scheme. Further mature trees are along Barracks Road that do not appear to have been assessed (outside DCO limits). This is acceptable, if no construction traffic will use Barracks Road and it is only included in DCO for visibility splays for the access points. Traffic management would be preferred to increased visibility splays in landscape terms.</p>
7n	F-DAP4: The Street, Assington (Assington Mill access road) (sheet 16)			<p>SCC (LHA) visited this location on a site visit. Its observations noted that there is a degraded palling fence 2m from the edge of the carriageway. It is likely that this lies outside the highway boundary. The area between the fence and the carriageway an area of scrub / brambles will require cutting. Additionally, a well-maintained coniferous hedge overhangs the hence and impinges on the visibility splay, this will require cutting back to the fence line and this is likely significantly affect the</p>

				<p>appearance / health of the hedge. As the hedge is within private property, the owner’s approval will be required before trimming.</p> <p>The highway boundary has not been determined at this location, but SCCs opinion is that the that the PROW and salt bin are beyond the highway limit as this would be most likely taken as the chestnut rail fence across to the front of the hedge on the east side of the access i.e. that area available for the public to pass and repass.</p>
7o	D-DAP2 – Access to Dedham Vale East CSE compound			<p>SCC (LHA) visited this location on a site visit. Its observations noted that the hedge will be required to be removed either side of access for approximately 40m to achieve 90m visibility splay. In general, the hedge comprises two line of planting and only that near road would need removal. Potential planting behind the furthest line. It is noted that access D-AP4 requires significant hedge removal / coppicing to achieve 90m visibility being on inside of bend. Narrow width of road would prevent two-way temporary signals or stop go. The authority would suggest that D-DAP2 used as sole access on east side of Millwood Road.</p>
7p	F-AP4 – Access to Dedham Vale West CSE compound			<p>SCC (LHA) conducted a drive by inspection of this location. Its assessment found that the bellmouth is likely to require permanent infilling of short length of ditch and removal of some hedge to the east due to bend noting proximity of access to end of speed limit.</p>

7q	G-AP1 at Barking Tye (sheets 17 and 19)			SCC (Landscape) considers W-171/002/X and W-113/001/0 to be unsuitable to be used as access route. The potential impact on mature trees under Tree Preservation Order through pruning/ pollarding/ topsoil stripping and soil compaction are unacceptable, as is the adverse long-term effect on the character of these PRow. Alternative access should be secured.
7r	G-AP3 – Access to Stour Valley East CSE compound			SCC (LHA) did not consider it safe to stop at this location. There is the potential that some small trees may need to be removed. It was noted that the Land to the north is higher than the highway. The authority is concerned that there are no details of how the permanent (and temporary) access roads are to be drained.
7s	Compounds (General)			SCC (Landscape) can confirm that the compounds that look acceptable in terms of vegetation loss are: 1, 2, 3, 4, 7, 8, 9, 10, 12.
7t	Compound 5 (sheet 16)			SCC (Landscape) notes that the access across A134 will need to be micro-sited to avoid mature roadside trees and should make use of existing powerline corridor, where vegetation growth is already restricted.
7u	Compound 6 (sheet 19)			SCC (Landscape) considers that the existing farm track should not be used for access, using the field instead. The track is vegetated and there are mature trees that have not been identified other than as part of the hedgerow.



7v	Compound 11			SCC (Landscape) were unable to locate this compound.
7w	Compound 12 (Sheet 28)			SCC (Landscape) notes that the hedgerow vegetation along the south-western and north-western boundaries of the compound are not clearly shown on Vegetation Retention and Removal Plan. These hedgerows need to be appropriately protected.
7x	Revised LIR Annex F			<p>SCC (LHA) provided a revised version of Annex F of the Joint Suffolk LIR at Deadline 6 in its Post-Hearing Submission for ISH6 (Appendix 1) <b>[REP6-057]</b> that identified matters that may be of concern for each specific access and had anticipated the applicant would have used this to identify those requiring further attention.</p> <p>In SCC’s view the drawings included in <b>[REP7-027]</b> would represent a minimum level of detail if supported with the key dimensions of the individual bellmouths, swept path analysis where appropriate and details of the vegetation to be removed or trimmed. Whilst the applicant has presented these in meetings the LHA has had little influence in which accesses were assessed other than providing Annex F for the Applicant’s reference.</p> <p>SCC considers the most sensitive higher risk accesses not assessed to date are:</p> <ul style="list-style-type: none"> <li>• C-AP1 and C-Ap2 on the B1070 in Layham</li> <li>• F-AP4 on the B1068 in Leavenheath</li> </ul>

				<ul style="list-style-type: none"> <li>• F-AP5 Leavenheath and F-AP7 Assington both on the A134</li> <li>• G-AP3 and G-AP4 on the B1508 at Bures St Mary.</li> </ul> <p>These accesses generally have the highest volume of construction traffic on the busiest (in local terms) roads and include two of the permanent accesses. In some cases (A134 and B1508) compliance with existing speed limits is poor. This does not mean other issues such as the impacts of vegetation clearance remain at other locations. Please refer to the final revision of LIR Annex F submitted at D8.</p>
7y	Additional Sensitive Receptor			<p>Following a site visit, SCC (LHA) has become aware of an additional sensitive receptor in Assington, specifically Ryes College, a private school located on Bures Road, Assington.</p> <div style="background-color: black; height: 15px; width: 100%;"></div>