

# **The Lake Lothing (Lowestoft)**

## **Third Crossing Order 201[\*]**

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Lake Lothing  
**THIRD  
CROSSING**

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### **Document SCC/LLTC/EX/2: Response to Relevant Representations**

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**Planning Act 2008**

**Infrastructure Planning**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

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## Foreword

This Response to Relevant Representations document relates to an application (“the Application”) submitted by Suffolk County Council (“the Applicant”) to the Secretary of State (through the Planning Inspectorate) for a development consent order (“DCO”) under the Planning Act 2008.

If made by the Secretary of State, the DCO would grant development consent for the Applicant to construct, operate and maintain a new bascule bridge highway crossing, which would link the areas north and south of Lake Lothing in Lowestoft, and which is referred to in the Application as the Lake Lothing Third Crossing (or “the Scheme”).

CONTENTS	PAGE No.
<b>Foreword .....</b>	<b>ii</b>
<b>Tables .....</b>	<b>v</b>
<b>Figures .....</b>	<b>vi</b>
<b>Abbreviations .....</b>	<b>vii</b>
<b>1 Introduction.....</b>	<b>1</b>
1.1 Purpose of the report .....	1
1.2 Structure of this report .....	2
1.3 Statements of common ground .....	2
<b>2 Context .....</b>	<b>4</b>
2.1 Overview.....	4
2.2 Key issues .....	5
<b>3 Policy .....</b>	<b>6</b>
3.1 Overview.....	6
<b>4 Draft DCO .....</b>	<b>7</b>
4.1 Overview.....	7
4.2 Key issues .....	8
<b>5 Environment.....</b>	<b>25</b>
5.1 Overview.....	25
5.2 Key issues .....	26
<b>6 Compulsory acquisition and other land matters .....</b>	<b>59</b>
6.1 Overview.....	59
6.2 Key issues .....	60
<b>7 Maritime and Port Operations .....</b>	<b>102</b>
7.1 Overview.....	102
7.2 Key issues .....	103
<b>8 Highways and transportation.....</b>	<b>111</b>

---

8.1	Overview.....	111
<b>9</b>	<b>Socio-economic .....</b>	<b>141</b>
9.1	Overview.....	141
9.1	Key issues .....	142
	Appendix A Traffic Flows on Waveney Drive.....	146
	Appendix B Victoria Road / Waveney Drive link distances in metres.....	147
	Appendix C SATURN Traffic model network showing loading points for Developments in Kirkley Waterfront .....	148
	Appendix D Traffic demand changes to/from Riverside Business Park & Lings Motor Group.....	149
	Appendix E Traffic flow changes on B1531 and A146.....	150
	Appendix F Visibility requirements for proposed Canning Road / Riverside Business Park .....	151
	Appendix G A47 Bascule Bridge and Mutford Bridge journey time routes.....	153
	Appendix H Forecast peak hour flows for the Scheme .....	156

## Tables

Table 2-1 Matters raised on context .....	5
Table 4-1 Matters raised on the draft DCO.....	8
Table 5-1: Matters raised on environment.....	26
Table 5-2 Predicted underwater noise levels for vibro-piling at a range of distances (Illingworth and Rodkin 2007).....	38
Table 5-3 Trawl sample results .....	40
Table 6-1: Matters raised on compulsory acquisition and other land matters .....	60
Table 6-2 vehicles emerging from Lings.....	89
Table 6-3 2037 Sensitivity test .....	90
Table 7-1: Matters raised on maritime and port operations .....	103
Table 8-1: Matters raised on highways and transportation issues .....	112
Table 9-1 Matters raised on socio-economics .....	142
Table A-1 Traffic flow changes on Waveney Drive (west of New Access Road).....	146
Table A-2 Traffic flow changes on Waveney Drive (between New Access Road and Southern roundabout) .....	146
Table A-3 Traffic flow changes on Waveney Drive (Lings Access to A12).....	146
Table D-1 Traffic demand changes to/from Riverside Business Park & Lings Motor Group – 2016 Base, 2022 & 2037 Do Minimum.....	149
Table D-2: Split of traffic demand to/from Lings Motor Group & Riverside Business Park – 2022 & 2037 Do Something .....	149
Table E-1: Traffic flow changes on B1531 Victoria Road adjacent to level crossing .....	150
Table E-2: Traffic flow changes on A146 Bridge Road adjacent to level crossing.....	150
Table G-1 A47 Bascule Bridge journey time route – Beccles to Lowestoft (Eastbound / Northbound).....	154
Table G-2 A47 Bascule Bridge journey time route – Lowestoft to Beccles (Southbound / Westbound) .....	154
Table G-3 Mutford Bridge journey time route – Beccles to Lowestoft (Eastbound / Northbound).....	155
Table G-4 Mutford Bridge journey time route – Lowestoft to Beccles (Southbound / Westbound) .....	155
Table H-1: Forecast peak hour flows on the Scheme bridge .....	156

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## Figures

Figure B-1: Victoria Road / Waveney Drive link distances in metres .....	147
Figure C-1 SATURN Traffic model network showing loading points for Developments in Kirkley Waterfront .....	148
Figure F-1 - Visibility requirements for proposed Canning Road / Roverside Business Area.....	145
Figure G-1 Journey time routes between Beccles and Lowestoft .....	153

## Abbreviations

<b>ABP</b>	Associated British Ports
<b>CftS</b>	Case for the Scheme
<b>CoCP</b>	Code of Construction Practice
<b>DCLG</b>	Department for Communities and Local Government (now referred to as the Ministry of Housing, Communities and Local Government)
<b>DCO</b>	Development Consent Order
<b>dDCO</b>	Draft Development Consent Order
<b>DfT</b>	Department for Transport
<b>DGM</b>	Design Guidance Manual
<b>DML</b>	Deemed Marine Licence
<b>DMRB</b>	Design Manual for Roads and Bridges
<b>DR</b>	Design Report
<b>EA</b>	Environment Agency
<b>EIA</b>	Environmental Impact Assessment
<b>ES</b>	Environmental Statement
<b>FRA</b>	Flood Risk Assessment
<b>GI</b>	Ground Investigation
<b>HRA</b>	Habitat Regulations Assessment
<b>HGV</b>	Heavy Goods Vehicle
<b>LPA</b>	Local Planning Authority
<b>MMO</b>	Marine Management Organisation
<b>NMU</b>	Non-motorised user
<b>NNNPS</b>	National Networks National Policy Statement



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<b>NRA</b>	Navigational Risk Assessment
<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>OAR</b>	Options Appraisal Report
<b>OBC</b>	Outline Business Case
<b>PEIR</b>	Preliminary Environmental Information Report
<b>PINS</b>	Planning Inspectorate
<b>PNPS</b>	Ports National Policy Statement
<b>SCC</b>	Suffolk County Council
<b>SoCG</b>	Statement of Common Ground
<b>SoS</b>	Secretary of State
<b>SSSI</b>	Site of Special Scientific Interest
<b>SRN</b>	Strategic Road Network
<b>SuDS</b>	Sustainable Drainage System
<b>TA</b>	Transport Assessment
<b>WDC</b>	Waveney District Council
<b>WFD</b>	Water Framework Directive
<b>WSI</b>	Written Scheme of Investigation

# 1 Introduction

## 1.1 Purpose of the report

1.1.1 This report provides a response to the key issues raised by the relevant representations submitted by Interested Parties. A total of 38 relevant representations were submitted to the Planning Inspectorate (PINS) as set out below;

- Three from local authorities;
- 13 from other organisations (statutory and non-statutory); and
- 22 from members of the public and businesses.

1.1.2 This total includes a response from Waveney Gymnastics Club which was published on 19 November 2018 on the PINS website.

1.1.3 Suffolk County Council (SCC) and Waveney District Council (WDC) have provided a joint representation and therefore is counted as a single representation above.

1.1.4 Howes Percival LLP provided seven identical responses on behalf of Overseas Interests Inc, Waveney Fork Trucks Limited, Lift Truck Rentals Limited, Nexen Lift Trucks Limited, Oakes Recruitment Limited, Team Oakes Limited and Hitech Grand Prix Limited all of which have an interest in the same land at Riverside Road. These have each been counted separately towards the total of 38 relevant representations, but this report responds to them only once.

1.1.5 Where the same issue has been raised in multiple responses, the Applicant has only responded once to the issue raised but has listed each of the Interested Parties' names against the issue.

1.1.6 The responses have been grouped into themes in line with the Principal Issues in the Rule 6 letter, received 6 November 2018.

1.1.7 The report provides Suffolk County Council's, as the Applicant, response to the issues raised, thereby providing a reference document for all Interested Parties and the Examining Authority.

1.1.8 The report groups the issues raised in the relevant representations on a thematic basis and provides a response to these issues, while also identifying the Interested Parties who have raised them.

1.1.9 There is evidently a degree of subjectivity in allocating a matter to a theme where there is overlap in the nature of the point, for example a highways point raised by a landowner. To maintain as much consistency as possible, points raised by landowners are generally considered under the Land theme where it relates to the operation of a particular site. If it is a wider point on the traffic model, for example, that is addressed in the Highways chapter. The points raised by Associated British Ports, as the owner and operator of the Port of Lowestoft, have been split according to the theme to which they relate, acknowledging that they equally could all be placed

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under Maritime and port operations theme, given the nature of the party making the representation.

1.1.10 There were some relevant representations, or parts of representations that did not make any point requiring a response. For each of those cases, those interested parties and issues raised are not identified in the tables following in this report.

## 1.2 Structure of this report

1.2.1 The report addresses the relevant representations in the following chapters 2 to 9 based on the Principal Issues identified by the Examining Authority.

1.2.2 The report provides an overview of each issue and reference to the relevant application documentation, making it clear where the issue is covered.

- Chapter 2: Context
- Chapter 3: Policy
- Chapter 4: Draft Development Consent Order (dDCO)
- Chapter 5: Environment
- Chapter 6: Compulsory Acquisition and other land matters
- Chapter 7: Maritime and port operations
- Chapter 8: Highways and transportation
- Chapter 9: Socio economic

1.2.3 Within the report those Interested Parties indicated with an asterisk (\*) are affected land interests which are named in the Book of Reference.

## 1.3 Statements of Common Ground

1.3.1 The Applicant is in the process of preparing Statements of Common Ground (SoCGs) with nine organisations, as outlined below. The purpose of agreeing SoCGs, which identify matters agreed, those under discussion and matters not agreed, is to provide a record of engagement with parties and to ensure that the Examining Authority is able to focus on the main issues at the examination. Many of the issues set out within this report, attributable to the relevant representations submitted by these third parties, will therefore be addressed through the process of preparing and agreeing SoCGs. A SoCG Report (Document Reference SCC/LLTC/EX/5) appending SoCGs with the Interested Parties below has been submitted alongside this report.

1.3.2 The organisations that SoCG have been prepared with are:

- Environment Agency
- Highways England
- Historic England
- Natural England

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- Suffolk County Council and Waveney District Council (combined)
  - Broads Authority
  - Marine Management Organisation (MMO)

1.3.3 A SoCG is being drafted with Associated British Ports (ABP). A meeting was held between SCC and ABP on the 19 November with the aim of finalising the SoCG to enable its submission with this report. Matters were unable to be fully agreed for submission at that meeting; however good progress was made. As such the Applicant anticipates that a draft will be able to be submitted prior to the Preliminary Meeting.

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## 2 Context

### 2.1 Overview

- 2.1.1 The Context theme includes issues raised about purpose and justification of the Scheme, including funding. Two interested parties raised issues on the theme. Table 2-1 sets out the matters raised on the theme, alongside a response from the Applicant.

## 2.2 Key issues

Table 2-1 Matters raised on context

Issue number	Rep no.	Name	Summary of relevant representation	Response
CT1	RR-010	Mr R Cousin	Provide a declaration of any conflict of interest by council members on the project with any commissioned company involved in the project.	Suffolk County Council (SCC) has robust procedures in place to deal with conflicts of interest, including a Code of Conduct Policy applicable to staff <sup>1</sup> , while Councillors are obliged by law to provide up to date details of anything that may give rise to a conflict of interest, including any gifts or hospitality they receive. Registers of Member's interests are held on SCC's website <sup>2</sup> .
CT2	RR-010	Mr R Cousin	What funding has been allocated for the maintenance of the bridge and its surroundings after construction and the source of this funding?	Maintenance costs of the Scheme have been integral to the development of the design (see for example the Design Principles set out in the Design Report (document reference 7.5 / PINS document reference APP-123) and is one reason why a traditional bascule bridge was not preferred. SCC has a Highway Maintenance Operational Plan and as part of the SCC highway, this Scheme will be maintained in accordance with that plan, individual sections of highway do not have their own discrete budget.

<sup>1</sup> <https://www.suffolk.gov.uk/assets/council-and-democracy/council-departments-services-and-senior-officers/SCC-Code-of-Conduct.pdf>

<sup>2</sup> <https://www.suffolk.gov.uk/council-and-democracy/councillors-and-elected-representatives/register-of-members-interests/>

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## 3 Policy

### 3.1 Overview

- 3.1.1 The Policy theme covers compliance with the policy set out in the National Policy Statement for National Networks and Local Development Plans. Whilst a Principal Issue identified by the Examining Authority, no issues were raised in the relevant representations on this theme.

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## 4 Draft DCO

### 4.1 Overview

- 4.1.1 Eight parties raised issues on the draft DCO. Table 4-1 provides the matters raised on this theme, alongside a response from the Applicant.
- 4.1.2 The dDCO (document reference 3.1 / PINS document reference APP-005) will be revised and submitted to the Examining Authority for Deadline 3, further to discussions with stakeholders.



## 4.2 Key issues

Table 4-1 Matters raised on the draft DCO

Issue number	Rep no.	Name	Summary of relevant representation	Response
DCO1	RR-022	ABP*	<p><u>DCO Submission</u></p> <p>The ExA will have seen ABP's correspondence with PINS concerning the validation of the LLTC application. ABP remains of the view that the applicant has failed to comply with the requirements of the PA 2008 in terms of meaningful consultation and negotiation. This has led to the submission of an ES that is inadequate, misleading and legally deficient in terms of the requirements of the EIA Regulations.</p>	<p>The Applicant assumes that ABP is referring to acceptance of the application under section 55 of the Planning Act 2008.</p> <p>ABP's suggestion that the Applicant failed to comply with the requirements of the Planning Act 2008 in terms of meaningful consultation and negotiation is not replicated in any of the Adequacy of Consultation Responses submitted by relevant local authorities prior to the acceptance of the Application (see PINS references AoC-001 to AoC-007).</p> <p>The Applicant does not consider that the ES (document reference 6.1 to 6.3 / PINS document reference APP-136 to APP-205) is inadequate or misleading; further, the Planning Inspectorate's Section 55 Checklist, published following acceptance of the Application, indicated that the ES was of a satisfactory standard in terms of the requirements of the EIA Regulations.</p>
DCO2	RR-022	ABP*	<p><u>Development Consent Order</u></p> <p>As promoted, the DCO is both legally deficient and unacceptable in port operational</p>	<p>The dDCO is based on the information available to the Applicant at the time of drafting. Its drafting and structure recognises the existing Port regime (including its byelaws)</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
			<p>terms. The applicant has failed to take into account: -</p> <p>(a) The seriously detrimental impact that its scheme will have on ABP's day to day operations;</p> <p>(b) The ability of ABP to operate, manage and regulate the Port in terms of its bye-laws;</p> <p>(c) ABP's future operations; and</p> <p>(d) ABP's need to comply with its statutory duties and obligations, including those as SHA, the ISPS Code and ABP's statutory obligation to ensure the safety of navigation and protection of people, vessels and the environment.</p>	<p>and seeks to establish the bridge within that framework. The Applicant does not consider the drafting in the dDCO to be legally deficient; however, it does recognise that the dDCO is currently and necessarily, at this relatively early stage in the DCO application process, a working draft document. As such, it follows that there are a number of areas where the drafting will require further development or refinement. In particular, such areas relate to matters which are under discussion, but remain to be settled with ABP.</p> <p>As ABP will be aware, the Applicant has sought to engage with ABP over a considerable period of time, including time prior to submission of the Application, and has, during that time, requested information from ABP to inform the preparation and content of the Application. A history of this correspondence is set out in the Negotiations Tracker (document reference 4.4/PINS document reference APP-010). Where the information sought has not been forthcoming or is yet to be provided, the Application documentation is, of course, either silent on those points or is informed by the Applicant's own investigative and assessment work.</p> <p>As ABP will appreciate, the interface between</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
				<p>the DCO and any related side-agreement with ABP will be complex, and will need to be identified and defined in collaboration with ABP over the coming months, in advance of and during the Examination of the Application. The Applicant would very much welcome ABP's ongoing collaboration on that front, in order to ensure that the DCO accommodates appropriately both ABP's and the Applicant's respective statutory functions.</p> <p>The Applicant has addressed matters relating to the operation of the Port in the ES (document reference 6.1 / PINS document reference APP-136) within Chapter 15 and more specifically in paragraphs 15.5.5 to 15.5.41.</p> <p>With regard to the safety of navigation and ABP's statutory duties these have been addressed within the Preliminary Navigation Risk Assessment (document reference 6.7 / PINS document reference APP-208). The 'serious detriment' test has also been considered in the Statement of Reasons (Applicant Document Reference 4.1, PINS Document Reference APP-007).</p> <p>These matters are under discussion with ABP.</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
DCO3	RR-022	ABP*	ABP will require a comprehensive indemnity against the risks and hazards that the applicant, by constructing the LLTC, will introduce to the Port. The current indemnity is inadequate.	It is the Applicant's position that the indemnity within the dDCO both in its approach and its specific drafting is well preceded under both the Planning Act 2008 regime (e.g. ABP Protective Provisions that were included in the DCOs made for Hornsea One, Hornsea Two, Tidal Lagoon Swansea and Able Marine Energy Park), and indemnities for harbour authorities affected by bridges found under other consenting regimes such as Mersey Gateway, Poole and Gateshead. It is therefore considered that it is adequate. Discussions on this matter continue with ABP.
DCO4	RR-009	Environment Agency	We are pleased to note that the Requirement relating to the Code of Construction Practice (Schedule 2, Part 1, Article 4) requires that the Environment Agency should be consulted on the CoCP. For the avoidance of doubt we request that the Requirement includes provision for approval by the Environment Agency before approval by the County Planning Authority.	<p>The Environment Agency's response is welcomed. However, it is considered that it would be inappropriate to require the dual approval of two discharging authorities in succession of the CoCP submitted for approval under requirement 4 of the dDCO (document reference 3.1/ PINS document reference APP-005). For regulatory certainty there must be a single discharging authority responsible for determining an application under a requirement.</p> <p>Requirement 4 requires both the Environment Agency and Waveney District Council to be consulted before the CoCP may be approved. The Applicant considers this approach is</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
				appropriate, well-precedented, and provides an opportunity for the Environment Agency's views on the CoCP submitted for approval to be properly taken in to account.
DCO5	RR-009	Environment Agency	We have also set out the detail required in order to grant a Flood Risk Activity Permit or approve disapplication.	The Applicant remains in discussion with the EA regarding Protective Provisions further to the proposed disapplication of the need for a FRAP in article 3 of the dDCO.
DCO6	RR-021	Network Rail*	<p>There are protective provisions for the benefit of Network Rail which are well precedented in both TWA Orders and DCOs. Examples of those protective provisions in respect of highway schemes can be found in recent A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order 2016 and the M4 Motorway (Junctions 3 to 12) (Smart Motorway) Development Consent Order 2016.</p> <p>Suffolk County Council has submitted a draft DCO which does not contain protective provisions in favour of Network Rail in the same format and to the same effect as contained in those previous orders.</p> <p>Accordingly, at present Network Rail objects to the proposed draft DCO on the basis that it</p>	<p>The proposed protective provisions included in the dDCO for the benefit of Network Rail are in an almost identical format to those in the A14 Order and are generally very well-precedented. A difference is that the Applicant is in this case seeking to limit its exposure to indirect or consequential loss. This has precedent in, for example, the protective provisions included for the benefit of Network Rail in the National Grid (Hinkley Point C Connection Project) Order 2016. The Applicant sent Network Rail a copy of its proposed protective provisions in May 2018, but has yet to receive any comments on them.</p> <p>The Applicant continues to engage with Network Rail to resolve the matter.</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
			does not include Network Rail's standard protective provisions. Network Rail will press, both in written representations and where necessary in submissions at hearings, the absolute need for its protective provisions to be included in a DCO where Network Rail's operational infrastructure is affected by the proposal.	
DCO7	RR-013	Anglian Water Services Ltd*	Anglian Water Services Limited noted it has been in discussion with the Applicant and is content with the protective provisions in the dDCO	The Applicant welcomes this confirmation.
DCO8	RR-014	Cadent Gas Limited*	<p>The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.</p> <p>Cadent has low, medium and intermediate pressure gas pipelines located within the order limits which are affected by works proposed.</p> <p>As a responsible statutory undertaker, Cadent's primary concern is to meet its</p>	The Applicant is in discussion with Cadent on the protective provisions, with only minor differences remaining.

Issue number	Rep no.	Name	Summary of relevant representation	Response
			<p>statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Cadent is discussing the potential impacts on its network with the promoter however any proposed relocations of apparatus or protections including the extent of any land or rights required by Cadent to facilitate works have not been finalised.</p> <p>Cadent is currently in discussion with the Promoter regarding protective provisions however wishes to reserve the right to make further representations as part of the examination process but in the meantime will continue negotiations with the promoter with a view to reaching a satisfactory agreement.</p>	
DCO9	RR-028	MMO	<p>In Part 5(59), the DCO makes reference to an arbitration clause, stating “ Except where otherwise expressly provided for in this Order and unless otherwise agreed in writing between the parties, any difference under any provision of this Order (other than a difference which falls to be determined by the tribunal) must be referred to and settled by a single arbitrator to be agreed between the parties or, failing agreement, to be appointed on the application of either party (after giving notice in writing to the other) by the President of the Institution of Civil Engineers.”</p>	<p>The Applicant's engagement with the MMO continues as outlined in the SoCG (Document Reference SCC/LLTC/EX/5), including in relation to the dDCO and draft Deemed Marine Licence (DML).</p> <p>The Applicant remains of the view that the provision for arbitration made by paragraph 24 of Schedule 12 to the dDCO is appropriate.</p> <p>The Applicant holds this view because, should the Order be made, it will be because the Secretary of State deems it in the public</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
			<p>The MMO has its own frameworks and mechanisms in place for the legal challenge of decisions through the Judicial Review process. Given this, arbitration clauses are not considered to be either appropriate or necessary. The MMO therefore advises that this clause be removed from the DCO.</p>	<p>interest that the development should occur. The Order will contain a DML put in place by the Secretary of State, not a marine licence granted by the MMO in the ordinary course.</p> <p>As such, any questions of interpretation should not be left to the MMO's sole discretion, with the only remedy for the Applicant in cases of disagreement being for it to seek judicial review (with the limitations of judicial review meaning that there would be no consideration of any substantive questions). Instead, it is appropriate that any disputes be referred to arbitration as that will allow for any disagreements as to interpretation to be considered in the round in the context of the Order, and its underlying public interest, as a whole.</p> <p>The Applicant is aware that this issue in relation to arbitration clauses within the DCO/DML has been raised by the MMO in the Tilbury2 Examination; having been accepted in DCOs previous to that. It is considered that further submissions will be able to be made by both parties on this topic following the Secretary of State's decision in relation to that DCO (due February 2019).</p>
DCO10	RR-028	MMO	The MMO provided substantial comments on	As noted above, the Applicant remains in



Issue number	Rep no.	Name	Summary of relevant representation	Response
			<p>the Deemed Marine Licence (DML). In summary these included:</p> <ul style="list-style-type: none"> <li>• that the all referenced coordinates be reviewed and revised.</li> <li>• that the coordinates of the offshore disposal site(s) to be utilised must also be included within Part 1(3) of the DML, in order to capture the areas within which all of the licensable activities are planned.</li> <li>• Part 2, Part 3 and Part 4 of the DML be merged into a single Part under the title of 'CONDITIONS'</li> <li>• a sub-paragraph be added as follows. "The MMO Marine Licensing Team must be sent a copy of the notifications required under sub-paragraph (g) within five working days".</li> <li>• Part 2(5) of the DML makes reference to "at least 8 weeks prior to the commencement of any construction activity". Given the scale and nature of the development, the MMO considers the specified timeframe to be inappropriate and advise that the wording of the paragraph be amended to "at least 4 months prior to the commencement of any construction activity", in accordance with standard MMO processing timeframes.</li> </ul>	<p>discussion with the MMO on the DML, and notes that any agreed changes to the DML will be included in the next iteration of the dDCO submitted to the Examination at Deadline 3, however the Applicant notes at the outset that, in relation to the MMO's comments in relation to time periods for submission of documents to the MMO, and for MMO determination, the dDCO for this Scheme has given more time to the MMO than they have accepted on the Silvertown Tunnel DCOs and the agreed DML contained within the final Tilbury2 DCO submitted for the Examination of that project.</p> <p>As such, the Applicant is concerned with the substantial increases that the MMO proposes, which have the potential to seriously delay a Scheme which will be sought to be built as soon as possible following consent. On arbitration, please see above.</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
			<ul style="list-style-type: none"> <li>Part 2 (5(2c)) of the DML is not worded as previously recommended by the MMO during pre-application. The MMO advises that the wording be revised as follows. "Provision that within the marine environment vibro-piling must be used as standard, with percussive piling only used if required to drive a pile to its design depth. If percussive piling is necessary soft-start procedures must be used to ensure incremental increase in pile power over a set time period until full operational power is achieved. The soft-start duration must be a period of not less than 20 minutes. Should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated."</li> <li>The MMO made recommendation on the wording of the licence.</li> <li>It should be noted that it is the responsibility of the Applicant to analyse the samples required in support of any dredge activity through a validated MMO laboratory. The MMO therefore advises that the wording of this section be revised.</li> <li>Part 5(24) of the DML makes reference to an arbitration clause. The MMO has its own frameworks and mechanisms in</li> </ul>	

Issue number	Rep no.	Name	Summary of relevant representation	Response
			place for the legal challenge of decisions through the Judicial Review process. Given this, arbitration clauses are not considered to be either appropriate or necessary. The MMO therefore advises that this clause be removed from the DML.	
DCO11	RR-017	Northumbrian Water Limited*	<p><u>Draft DCO provisions</u></p> <ul style="list-style-type: none"> <li>• <b>Article 3 (disapplication of legislation)</b> – concerns over the efficacy and purpose of article 3(3) which purports to disapply the effects of planning conditions).</li> </ul> <p>The disapplication provisions in section 120(5) of the Planning Act 2008 relate only to modification of a statutory provision (so would not extend to planning conditions issued pursuant to a planning permission) and in any event are limited to land falling within the Order Limits.</p>	<p>It is considered that the drafting in article 3(3) of the DCO is adequate and appropriate to achieve the desired effect of avoiding placing Northumbrian Water Limited in breach of the planning conditions to which its planning permission is subject, once the authorised development has commenced. The Applicant will consider the issue further at such time as Northumbrian Water Limited clarifies the nature of its concerns as to the efficacy of the drafting.</p> <p>The Applicant particularly notes that it is only land within the Order limits that is relevant for the purposes of this Article as that element of the 'Habitat Condition' to its planning permission will only be affected by the Scheme.</p> <p>The Applicant considers that the provision is able to be included within the DCO pursuant to section 120(3) and section 120(5)(c) of the Planning Act 2008.</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
DCO12	RR-017	Northumbrian Water Limited*	<b>Article 6 (protective works to buildings)</b> – specific concerns of the inclusion of powers lasting 5 years after the date the Scheme comes into use, and which extend to buildings beyond the Order Limits, and include rights to enter buildings to carry out surveys and monitoring (including leaving behind apparatus) and where reasonably required (art 16(4)) effectively secure exclusive temporary possession of the land and buildings for the purposes of carrying out protective works.	<p>It is assumed that Northumbrian Water Limited is referring to article 16 (protective works to buildings) of the DCO (document reference 3.1/ PINS reference APP-005).</p> <p>The purpose of article 16 is to enable the Applicant to carry out protective works to buildings, such as underpinning, to buildings affected by the authorised development. The power applies beyond the Order limits because certain buildings that could require protective works are on the edge of the Order limits; accordingly, it is considered necessary to include a power enabling the Applicant to access land to undertake survey and monitoring work outside of the Order limits on land adjacent to these buildings. The power ensures that such access may be taken, should that be required.</p> <p>This matter will be a subject of the Land and Works Agreement between the parties.</p>
DCO13	RR-017	Northumbrian Water Limited*	<b>Schedule 2 Requirements</b> – further to concerns on the nature of specific requirements (and potential need for additional requirements including controls on sequencing and phasing), NWL does not consider the inclusion of a deemed discharge provision in relation to applications to discharge	<p>It is considered appropriate to include deemed discharge provisions as they are necessary to ensure that this nationally significant infrastructure project is delivered without undue delay. Deemed discharge provisions are well preceded in DCOs.</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
			requirements to be appropriate, particularly where these decisions impact on third party interests.	Table 5-3 of the Environmental Statement (document reference 6.1 / PINS document reference APP-136) sets out the anticipated phasing of the works to the local highway network. As is noted in paragraph 5.6.14 of that document, this phasing is indicative and will be subject to detailed design. The Applicant is unable to accept controls over the phasing and sequencing of the construction of the authorised development until such time as the detailed design of the Scheme has been carried out. Flexibility in phasing is required to ensure that the Scheme can be delivered efficiently.
DCO14	RR-017	Northumbrian Water Limited*	<b>Schedule 4 (permanent stopping up of highways)</b> - the lack of express reference to cessation of traffic access between Canning Road and Riverside Road and any necessary sequencing provisions.	<p>Part 1 of Schedule 4 to the dDCO (document reference 3.1 / PINS document reference APP-005) does not list any highways that are to be permanently stopped up. This is because the Scheme does not propose the permanent cessation of use as a highway of any land. Rather, the Scheme proposes improvements to the existing highway which are shown by red hatching on the Rights of Way and Access Plans (document reference 2.5 / PINS document reference APP-027).</p> <p>The improvements proposed include the closure of the existing junction between Riverside Road and Canning Road and an</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
				<p>alternative route to access Trinity House will be provided from Waveney Drive via the New Access Road (reference C as shown on sheet 2 of the Rights of Way and Access Plans document reference 2.5 / PINS document reference APP-027), part of the existing Riverside Road to be improved and a unclassified road (reference D as shown on sheet 2 of the Rights of Way and Access Plans document reference 2.5/ PINS document reference APP-027).</p> <p>It is currently anticipated that the following construction sequence will take place before the closure of the existing Canning Road/Riverside Road Junction.</p> <ol style="list-style-type: none"> <li>1. Construct new access from Waveney Drive to Riverside Road – to include revised access into WDC;</li> <li>2. Construct new access from Riverside Road to Canning Road;</li> <li>3. Construct new roundabout and access to WDC – all WDC traffic to use revised access off Riverside Road while access is constructed; and</li> <li>4. Close existing Canning Road/Riverside Road Junction.</li> </ol>
DCO15	RR-017	Northumbrian	<b>Consultation on parking requirements –</b>	The Preliminary Transport Assessment (an

Issue number	Rep no.	Name	Summary of relevant representation	Response
		Water Limited*	although local residents were consulted on the proposed on street parking regulations on Durban Road, Kimberley Road, Notley Road and Kirkley Run, there does not appear to be any reference of consultation with local businesses in Riverside Business Park in terms of the proposed on street parking restrictions on Canning Road and Riverside Road.	Appendix to the Preliminary Environmental Information Report) set out at paragraph 4.5.1, having first explained the current parking situation in Riverside Road, that proposals to amend parking would be set out in the Transport Assessment (as they are at section 4.6 in document reference 7.2 / PINS document reference APP-093). Bespoke consultation was undertaken with local residents when it became apparent that an area outside of the Order limits may be affected by Traffic Regulation Measures (TRMs) included in the dDCO. The Applicant welcomes feedback on the dDCO including TRMs, and notes NWL's concerns over the removal of on street parking in this area. The Applicant can confirm this is under review and will update the Examining Authority in due course.
DCO16	RR-012	Lings Motor Group*	The notice periods contained in the draft Order (or where relevant in statute) for entering land and closing private and public rights of way are unreasonably short (or absent) and inadequate to allow businesses to mitigate the impact of the Scheme before the Scheme is implemented. This will exacerbate the adverse impact to businesses such as Lings;	<p>The Applicant is continuing to engage with Lings Motor Group regarding the effect of the Scheme on its land.</p> <p>The draft DCO (document reference 3.1/ PINS document reference APP-005) does not propose the stopping up of any public rights of way or highways, but the improvements to the local highway network will result in the changes to its operation to accommodate the</p>

Issue number	Rep no.	Name	Summary of relevant representation	Response
				<p>new bridge and its approaches.</p> <p>The Applicant intends to ensure appropriate steps are taken to manage any disruption caused during the construction of the Scheme, including the improvements to the related highway network. Paragraph 2.8.3 of the Interim Code of Construction Practice (document reference 6.3 Appendix 5A to the Environmental Statement/ PINS document reference APP-163) requires the Contractor as part of the full Code of Construction Practice (CoCP) to set out the traffic management measures that will be applied during the course of the construction phase. Paragraph 2.7.1 of the same document also requires the Contractor to allow access to Lings from the public highway during construction of the Scheme. The principles are secured by requirement 4 of the dDCO which requires the CoCP to be approved before the commencement of the Scheme, for the CoCP to be in accordance with the Interim Code of Construction Practice and for the authorised development to be carried out in accordance with the approved CoCP.</p> <p>The existing private means of access to the Lings Motor Group site affected by the Scheme are listed in Part 3 (private means of access to</p>



Issue number	Rep no.	Name	Summary of relevant representation	Response
				<p>be stopped up for which a substitute is to be provided and new private means of access which are otherwise to be provided) of Schedule 4 to the dDCO. Consequently, article 10(2) is clear that the private means of access listed in Part 3 may not be stopped up unless either (a) the substitute private means of access provided for in column (3) of Part 3 of Schedule 4 has been completed and is open for use or, pending completion of the substitute private means of access, (b) a temporary private means of access is provided. Article 10 ensures that the existing private means of access to the Lings Motor Group site are not permanently stopped up unless an alternative is available.</p> <p>The Applicant acknowledges that there remains uncertainty around the timing of when the Lings Motor Group land will be required for the Scheme and will continue to seek to reach a voluntary agreement with Lings Motor Group in respect of the Scheme's requirement for its land. However, to secure the delivery of the Scheme, the Applicant is seeking the powers of compulsory acquisition and temporary use provided for in the Order.</p>

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## 5 Environment

### 5.1 Overview

5.1.1 Ten interested parties raised issues on the environment. Table 5-1 provides the matters raised on the environment theme, alongside a response from the Applicant. The table has been subdivided into design, historic environment, flood risk, water environment, air quality, in line with the Examining Authority's Principal Issues. In addition, there is an 'other' section for those issues raised which do not fall into the previous sections.

5.1.2 These issues are mainly considered already in the ES (document reference 6.1 / PINS document reference APP-136) and accompanying appendices.

5.1.3 The Applicant plans to submit an updated:

- Design Guidance Manual (DGM) (document reference 7.6 / PINS document reference APP-133)
- Chapter 11 of the ES (document reference 6.1/PINS document reference APP-136)
- Interim Code of Construction Practice (Appendix 5A of the ES (document reference 6.3/PINS document reference APP-163)
- Interpretative Environmental Ground Investigation Report (Appendix 12B of the ES (document reference 6.3 / PINS document reference APP-192)) and the Piling Works Risk Assessment (Appendix 12C of the ES (document reference 6.3 / PINS document reference APP-193)) (both reflecting the full suite of groundwater and ground gas testing now completed);
- Sediment Transport Assessment (Appendix 17C of the ES (document reference 6.3 / PINS document reference APP-201));
- Drainage Strategy (Appendix 18B of the ES (document reference 6.3 / PINS document reference APP-204); and
- Written Scheme of Investigation (WSI) (Appendix 9F of the ES (document reference 6.3 / PINS document reference APP-179))

to Deadline 3 following further consultation with the relevant bodies.

5.1.4 Additionally, the Applicant proposes to submit a draft Scheme of Operation for the new bridge to Deadline 3.

## 5.2 Key issues

Table 5-1: Matters raised on environment

Issue number	Rep no.	Name	Relevant response	Response
<b>Design</b>				
EN1	RR-020	WDC and SCC*	With regard to the northern approach to the bridge, a public realm strategy there is not likely to be appropriate. However, there should be the inclusion of a sustainable drainage, biodiversity and visual amenity driven scheme along the lines of that associated with Tom Crisp Way for the northern landing of the bridge.	<p>As part of ongoing Local Planning Authority Design Workshops, the Northern Approach design has been developed further to meet the expectations of the authorities and gain their support.</p> <p>The area of the Scheme north-east of the proposed roundabout which once featured public realm with terraced steps, is now proposed to be predominantly tree and shrub planting to provide the benefits described. There was a view that public realm in this location would not be utilised, and it would be more appropriate to extend the planting treatment used on the north-western side of the proposed roundabout, to this area too.</p> <p>An updated Design Guidance Manual (document reference 7.6 / PINS document reference APP-133) will be submitted at Deadline 3.</p>
EN2	RR-003	Judith White	Design of bridge.	This design development of the bridge took into account various factors including cost, maintenance, reliability, operation time, in-water environments and visual impact. Options

Issue number	Rep no.	Name	Relevant response	Response
				<p>were also compared against their ability to meet the aim, objectives, and design principles defined for the Scheme. The design is the best proposal which balances these factors.</p> <p>Through discussion with the WDC and SCC, a design vision was developed to underpin the design from inception to implementation.</p> <p>The design for the crossing uses its prominent location in the town to provide a striking new feature which draws inspiration from Lowestoft's future as an emerging centre for the renewable energy industry in the UK.</p> <p>More information is provided in the Design Report (document reference 7.5/ PINS document reference APP-123) and the Draft Design Guidance Manual (document reference 7.6 / PINS document reference APP-133).</p>
EN3	RR-010	Mr R Cousin	What measures will be put in place to ensure the bridge does not become a suicide destination.	<p>The reference design assumes vehicle restraint systems are in place at the outer edge of the bridge deck, varying in height from 1.5 - 1.8m for safety purposes. Over the railway in particular these must be designed to deter people from climbing them. Further deterrents on the bridge deck would be inappropriate and detrimental to the experience of other bridge users. The bridge deck will be well lit and</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>surveillance from the adjacent Control Tower (assisted by CCTV) will be continuous to ensure no inappropriate behaviour during bridge opening sequences in particular. This will also enable intervention if a situation did occur. As the bridge is designed for use by pedestrians, cyclists and motor vehicles, there will be a level of continuous natural surveillance which would somewhat discourage such actions.</p> <p>The opening mechanism itself has been designed to ensure it is not within reach of the public on the bridge deck. The rolling bascule track is at a lower level than the bridge deck, and beyond the vehicle restraint systems.</p> <p>Anti-suicide design measures will be considered as part of updating the DGM for Deadline 3.</p>
<b>Historic Environment</b>				
EN4	RR-025	Historic England	We have previously raised concerns about the direct impact of the development upon non-designated heritage assets within the area of the development footprint, including palaeoenvironmental deposits dating to the Holocene and possible earlier. We are pleased to see the application includes the Cultural Heritage DBA (ES Vol 3 Appendix 9A) and	The content of the Written Scheme of Investigation (WSI) (Appendix 9F of the ES (document reference 6.3 / PINS document reference APP-179) was agreed provisionally with Historic England prior to the ES being submitted. In light of some further comments from Historic England the WSI will be updated following further discussions with Historic

Issue number	Rep no.	Name	Relevant response	Response
			<p>Deposit Model (ES Vol 3 Appendix 9B) on which we have previously commented. The application includes a WSI for future mitigation (ES Vol 3 Appendix 9F) which sets out how the proposed project might mitigate against impact to the historic environment. We will therefore require the draft DCO to include provision for delivery of the project specific WSI (should consent be granted).</p> <p>The WSI must enable the implementation of appropriate mitigation measures which are necessary to reduce the impact of the development upon the historic environment, and develop appropriate methodologies for further investigation within the project area. This will inform the delivery of the project in a timely way, by taking these matters into consideration prior to the commencement of construction activities. Therefore, the WSI must be produced and agreed prior to the project commencing, and before any further pre-construction surveys take place.</p>	<p>England and SCC and submitted to Deadline 3.</p> <p>Compliance with the WSI is secured by requirement 10 of the dDCO, and the WSI itself makes clear that surveys must be undertaken pre-construction. The Applicant has agreed, as noted in the SoCG (Document Reference SCC/LLTC/EX/5), with Historic England that reference to the trial pits WSI in Requirement 10 can be removed and this will be reflected in an updated draft of the DCO.</p> <p>As the SOCG records, the Applicant is in discussion with HE on the WSI, with only a few items remaining to be agreed.</p>
EN5	RR-025	Historic England	We have also previously raised concerns in relation to the impact of the development upon on the South Lowestoft and Oulton Broad Conservation Areas and on the significance of a number of designated heritages through development within their setting. In particular	The SoCG submitted alongside this document (Document Reference SCC/LLTC/EX/5) has been agreed with Historic England and notes their agreement that all relevant heritage assets have been adequately assessed in the ES (document reference 6.1 / PINS document

Issue number	Rep no.	Name	Relevant response	Response
			the Royal Norfolk and Suffolk Yacht Club which is listed at Grade II* and a group of Grade II listed buildings such as Port House.	reference APP-136) including the assets referred to here.
EN6	RR-025	Historic England	We are pleased that specific Cultural Heritage and Townscape and Visual Impact Chapters (ES Volume 1 Chapters 9 and 10) have been produced. We likewise welcome the helpful visualisations and photomontages. Using this additional material we have been able to confirm that there are only limited views from the designated heritage assets previously mentioned. The visualisations have indicated that the development will bring some changes to the setting of these assets; however we are of the view that any resulting harm would be moderate and that the commentary set out in the ES is broadly sufficient in this regard. We do not therefore consider it necessary to explore these issues any further, unless requested.	The SoCG submitted alongside this document (Document Reference SCC/LLTC/EX/5) has been agreed with Historic England and notes their agreement that the visualisations submitted with the application are sufficient to demonstrate the impact of the Scheme.
EN7	RR-020	WDC and SCC*	<b>Archaeology</b>  a. the Environmental Statement should make clear that further archaeological work will be required;  b. the DCO should make clear that an archaeological strategy should be in place before works commence;	(a) the Environmental Statement expressly acknowledges that further archaeological mitigation measures may be necessary, see section 9.8 of Chapter 9 Cultural Heritage of the Environmental Statement (document reference 6.1/ PINS document reference APP-136) and Appendix 9F, in Volume 3 of the Environmental Statement (document reference 6.3 / PINS ref APP-179) contains a Written Scheme of Investigation for Future Evaluation

Issue number	Rep no.	Name	Relevant response	Response
			c. the Code of Construction Practice should mention archaeology;	<p>and Mitigation.</p> <p>(b) Requirement 10 of the dDCO (schedule 2, document reference 3.1/ PINS document reference APP-005) addresses archaeological mitigation by securing a WSI, albeit the drafting of the requirement and the content of the WSI remains under discussion with SCC. It has however been agreed that reference to the trial pits WSI can be removed.</p> <p>(c) It is considered that it is unnecessary to include reference to archaeology in the Interim Code of Construction Practice as such matters are addressed fully in the written scheme of investigation secured by requirement 10.</p> <p>This matter has been agreed with SCC/WDC in the SoCG.</p>
<b>Flood risk</b>				
EN8	RR-009	Environment Agency	<p><b>Flood Risk and Flood Modelling</b></p> <p>We are very concerned that our previous advice has not been adhered to in respect of flood modelling and as a result we cannot rely on the conclusions drawn in the Flood Risk Assessment (FRA). In addition, the FRA does not address the increase in hazard and risk offsite which arises from the proposed</p>	<p>Following further discussion with the EA, the Applicant is confident that this matter will be able to be resolved through discussion with the EA. The Applicant has provided the modelled output files to the EA, and currently awaits their feedback. An update will be provided to Deadline 3.</p>



Issue number	Rep no.	Name	Relevant response	Response
			development. The emergency procedures referenced in this section rely on practices already in place that do not take into account the proposed development. To ensure safety it is necessary for procedures to be drawn up that take account of the situation that will exist if the proposal is granted consent.	
EN9	RR-009	Environment Agency	<b>Sediment Transport Assessment</b>  In summary, whilst it is possible that the risk to the water environment is low, and we expect that the fundamental conclusions are correct; there is insufficient evidence presented to confirm this. We are also concerned that the Assessment has not considered impacts during construction and therefore has not provided sufficient evidence to make an informed decision.	In response to these comments, and further discussion with the EA, the Applicant is updating the Sediment Transport Assessment (Appendix 17C of the ES (document reference 6.3 / PINS document reference APP-201) and will provide an updated version at Deadline 3.
EN10	RR-009	Environment Agency	<b>WFD Assessment</b>  We do not agree with some of the assumptions used in the Assessment nor that the data supplied in some sections is sufficient. As such we do not yet consider the Assessment to be complete.	The Applicant is confident that this matter will be able to be resolved through discussion with the EA and anticipates being able to update the ExA at Deadline 3.
EN11	RR-020	WDC and SCC*	<b>Floods and Water</b>	The final surface water drainage design will be agreed with the county planning authority,

Issue number	Rep no.	Name	Relevant response	Response
			<p>a) Further consideration should be given to the treatment of surface water prior to discharge into Lake Lothing.</p> <p>b) Non-return valves are specified on the outfalls. Consideration should be given to the storage required when the system is fluvially or tidally locked as well as the implications of operations of the proposed new tidal barrier.</p>	<p>following consultation with Waveney District Council, pursuant to Requirement 6 of the dDCO, and so these elements will be able to be considered at that time.</p> <p>As per that requirement, this design must be based upon the Drainage Strategy - Appendix 18B to the ES (document reference 6.3./ PINS document reference APP-204). This strategy provides that surface water will be passed through either a reed bed or interceptor prior to discharge.</p> <p>It sets out that the drainage system will be designed to cater for a 12hour 'lock in' for the system, with appropriate storage systems in place using a combination of 'ponds', 'tanks' and storage within the drainage system.</p> <p>Following discussion with the local authorities, this Drainage Strategy document is being updated by the Applicant and will be submitted to the Examining Authority at Deadline 3.</p>
<b>Water Environment</b>				
EN12	RR-028	MMO	<p>The MMO is of the opinion that the study area accurately captures the area of interest to the MMO and agrees with the conclusions of the ES and proposed mitigation measures.</p> <p>Overall, the MMO is content with the radius</p>	<p>This comment is noted and captured in the SoCG (document reference SCC/LLTC/EX/5) submitted with this report.</p> <p>It should however be noted that the Applicant</p>

Issue number	Rep no.	Name	Relevant response	Response
			defined for local environmental considerations and is of the opinion that the likely potential impacts to the marine environment have been adequately considered.	remains in discussion with the MMO regarding the scope of the assessment of disposal to sea of dredged arisings – please refer to the SoCG.
EN13	RR-028	MMO	The draft DCO indicated that the Lowestoft Circular North offshore disposal site (TH005) will be utilised for the disposal of dredged sediment. Having reviewed the application, it does not appear that the impact of dredge disposal is considered within the submitted ES. It is also acknowledged that whilst indicative volumes were provided to the MMO during pre-application, they have not been included within the ES. Specifically, the MMO advises that the ES be amended to detail the volume of dredged materials arising from the project and their impact, including cumulative impacts with concurrent disposal licenses, on any offshore disposal site to be utilised.	The assessment has assumed that 10,400m <sup>3</sup> of material is to be removed from Lake Lothing during the construction phase of the Scheme to construct the cofferdams and also to provide a permanent access to the small craft pontoon. It has likewise been assumed that the sediment will be disposed of at the same location as ABP dispose of maintenance dredgings, namely disposal site TH005 located 1nm east of Lowestoft. Sediment sampling including around the area of the mooring (see Appendix A within Appendix 12B of the Environmental Statement (document reference 6.3 / PINS document reference APP-192)) undertaken as part of the assessment of the Scheme has identified that the sediment in Lake Lothing is largely uniform and suitable for offshore disposal in accordance with the Marine Management Organisation's criteria. Similarly, the Habitat Regulations Assessment undertaken by ABP to support their licence application for offshore disposal at disposal site TH005 identified that there was no adverse effect upon the integrity of the Outer Thames Estuary SPA or the Southern North Sea SAC

Issue number	Rep no.	Name	Relevant response	Response
				<p>as a result of the maintenance dredge and disposal activity.</p> <p>Furthermore, ABP's disposal licence is for a total tonnage of 200,000 wet tonnes per annum of which only approximately a half was used in 2017 (102,000 wet tonnes). It is accordingly concluded that the small increase in volume of sediment to be disposed of, combined with the temporal separation of the activity from the likely programme of ABP's maintenance dredging, does not materially affect the conclusions of the HRA undertaken for ABP and there are no significant effects upon the integrity of the Natura 2000 site. The Habitats Regulation Assessment has been updated (document reference SCC/LLTC/EX/6) to address this issue with respect to the Scheme.</p> <p>This issue is identified as an issue still under discussion in the SoCG with the MMO.</p>
EN14	RR-028	MMO	In relation to Section 11.4, the applicant describes the physical environment including the sediment composition and local hydrodynamics. It is also noted that in Table 2-1 of Appendix 17C bathymetric survey data was obtained from the Association of British Ports. The MMO considers that these data to be important and advises that they are	In response to these comments a bathymetric survey drawing that informed the Sediment Transport Assessment (part of Appendix 17C of the ES (document reference 6.3 / PINS document reference APP-201)) will be submitted to the Examining Authority for Deadline 3 within the updated Sediment Transport Assessment.

Issue number	Rep no.	Name	Relevant response	Response
			included within the ES as they are an integral part of the site description.	The MMO is content with this approach.
EN15	RR-028	MMO	In relation to Section 11.5, it is not clear how conclusions regarding the significance of impacts on marine benthic receptors, or indeed various other ecological receptors, have been reached. The MMO therefore advises that additional information is required on the different pathways to impact and the predicted magnitude of the identified impacts.	With regard to marine benthic receptors, please refer to Table 11-4 in the ES (document reference 6.1 / PINS document reference APP-136) which identifies that Lake Lothing supports an impoverished community of marine invertebrates. Table 11-5 (Effects of the Scheme) in the ES presents the conclusion that no species of particular nature conservation interest were present. Therefore, there is no need to consider pathways to impact because there is no species of note that can be impacted upon. This issue has been discussed with the MMO, and it has been agreed to update Chapter 11 of the ES to ensure that there is clarity on how synergistic effects have been considered. This will be submitted to Deadline 3.
EN16	RR-028	MMO	In relation to Section 11.5, the MMO advises that due to the limited temporal nature of the fish trawl surveys (Appendix 11F) it cannot be concluded that “the scheme will have no effect upon migratory fish”, as there is no evidence to support this. The MMO advises that the ES be revised to acknowledge the limited temporary nature of the baseline beam trawl survey.	It is acknowledged that the fish trawl survey, like all surveys that support the ES (document reference 6.1 / PINS document reference APP-136), are temporal in nature. However, the fish trawl survey that was undertaken was designed to characterise the biota of the area and therefore is a reasonable reflection of what was present in the survey area at the time. It is noteworthy that that beam trawl

Issue number	Rep no.	Name	Relevant response	Response
				methodology and sample size was presented to MMO at the statutory consultation stage. This issue has been discussed with the MMO, and it is noted that the MMO are now satisfied on this issue in the SoCG with the MMO.
EN17	RR-028	MMO	In relation to Section 11.5, the MMO advises that full consideration is given to the potential pathways to impact to European eels ( <i>Anguilla Anguilla</i> ) generated by the works, particularly with respect to noise and vibration.	<p>During the construction and the operational phase of the Scheme, Lake Lothing would not be blocked for fish because even with both cofferdams in place, the width of the navigation channel would still be open. The ES concludes no significant effect upon fish due to there being no barrier being in place.</p> <p>With regard to impacts from noise and vibration these would arise during piling operations. Typically, a low impact vibration method is used for pile driving. This method produces significantly less noise than impact hammer methods and has a significantly reduced impact on fish. The noise level at source of high-frequency vibro-piling is typically 192 dB re 1 <math>\mu</math>Pa (Illingworth and Rodkin, 2007). This is shown to attenuate with increasing distance from the source to 132 dB re 1 <math>\mu</math>Pa at 1000 m from the source (Table 5-2). At these noise levels fish will not be exposed to lethal effects although physical injury may occur within approximately 10 m of the noise source and within 750 m they may</p>

Issue number	Rep no.	Name	Relevant response	Response																																																																						
				<p>exhibit a behavioural response.</p> <p><i>Table 5-2 Predicted underwater noise levels for vibro-piling at a range of distances (Illingworth and Rodkin 2007)</i></p> <p><b>*Decibels (dB) where the reference sound pressure for water is 1 micropascals (1 μPa). Sound pressure = force per unit area.</b></p> <table><tr><td><b>Distance from source (m)</b></td><td>2</td><td>5</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>7</td><td>1</td></tr><tr><td></td><td>5</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>5</td><td>0</td></tr><tr><td></td><td></td><td></td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>0</td></tr><tr><td><b>Vibro-piling (dB re 1 μPa*)</b></td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr><tr><td></td><td>6</td><td>5</td><td>5</td><td>4</td><td>4</td><td>4</td><td>3</td><td>3</td><td>3</td></tr><tr><td></td><td>4</td><td>8</td><td>2</td><td>6</td><td>2</td><td>0</td><td>8</td><td>4</td><td>2</td></tr></table> <p>The Applicant would also note that condition 5 of the DML requires that “vibro piling techniques are to be used as standard, with percussive piling only used if required to drive a pile to its design depth.”</p> <p>Nevertheless it has been agreed that paragraph 11.5.15 of the ES should be updated to reflect that the European eel is a noise sensitive species, and further that this</p>	<b>Distance from source (m)</b>	2	5	1	2	3	4	5	7	1		5	0	0	0	0	0	0	5	0				0	0	0	0	0	0	0										0	<b>Vibro-piling (dB re 1 μPa*)</b>	1	1	1	1	1	1	1	1	1		6	5	5	4	4	4	3	3	3		4	8	2	6	2	0	8	4	2
<b>Distance from source (m)</b>	2	5	1	2	3	4	5	7	1																																																																	
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<b>Vibro-piling (dB re 1 μPa*)</b>	1	1	1	1	1	1	1	1	1																																																																	
	6	5	5	4	4	4	3	3	3																																																																	
	4	8	2	6	2	0	8	4	2																																																																	

Issue number	Rep no.	Name	Relevant response	Response
				should be recorded in an update to the interim CoCP, submitted to Deadline 3.
EN18	RR-028	MMO	<p><u>Chapter 20 (Cumulative Effects)</u></p> <p>In relation to Section 20.3, it is stated in Table 20-3 that there will be interaction between noise and vibration and ecological receptors and that “all of these effects and interactions are dealt with in Chapter 11 Ecology and not considered here”. The MMO does not consider that Chapter 11 sufficiently considers the cumulative impacts on ecological receptors. The MMO therefore advises that either Chapter 11 or Chapter 20 be revised to demonstrate due consideration of cumulative impacts to ecological receptors.</p>	<p>In Paragraphs 11.5.13 to 11.5.15 the ES (document reference 6.1 / PINS document reference APP-136) identifies that terrestrial and fish species are not at risk from marine noise. The Applicant notes that mitigation measures are in place for managing the works with regard to harbour porpoise a species for which the Southern North Sea is a designated site.</p> <p>With regard to other synergistic effects, the ES does not address the effects of contamination upon marine species, however the concentrations identified within Lake Lothing are not elevated to the point where offshore disposal of sediment is an issue, and therefore the Scheme will not increase the risk to marine species from contaminated materials.</p> <p>With regard to flooding and the water environment, the highway runoff from the Scheme will not be at a rate or have a concentration of pollutants that is likely to be harmful to marine species.</p> <p>With regard to the impacts of noise upon marine species this has been addressed in</p>



Issue number	Rep no.	Name	Relevant response	Response															
				<p>response to Issue number EN17.</p> <p>Notwithstanding the above, the Applicant has undertaken in the SoCG with the MMO to update Chapter 11 of the ES so there is clarity on this point. This will be submitted to Deadline 3.</p>															
EN19	RR-028	MMO	<p><u>Appendix 11F (Benthic Survey)</u></p> <p>In relation to Section 3.1, it would be beneficial for the application to identify the type of beam trawl used for the survey work and duration of sampling conducted. The MMO therefore advises that the Section be revised to include further information regarding the beam trawl survey method and the duration of the surveys.</p>	<p>Trawl samples were collected using a 2m scientific beam trawl conforming to Cefas specifications (Jennings et al., 1999), fitted with a 4mm codend. Prior to each deployment the net was inspected for damage which may have affected sample integrity. The duration and distance covered by each trawl are presented below.</p> <p><i>Table 5-3 Trawl sample results</i></p> <table><tr><th>Station / Sample</th><th>Distance Covered (m)</th><th>Duration (minutes: seconds)</th></tr><tr><td>Trawl 1</td><td>130 m</td><td>4:43</td></tr><tr><td>Trawl 2</td><td>128 m</td><td>4:32</td></tr><tr><td>Trawl 3</td><td>143 m</td><td>5:46</td></tr><tr><td>Trawl 4</td><td>122 m</td><td>5:02</td></tr></table>	Station / Sample	Distance Covered (m)	Duration (minutes: seconds)	Trawl 1	130 m	4:43	Trawl 2	128 m	4:32	Trawl 3	143 m	5:46	Trawl 4	122 m	5:02
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Issue number	Rep no.	Name	Relevant response	Response
				<p>Jennings, S., Lancaster, J. Woolmer, A. &amp; Cotter, J., 1999. Distribution, diversity, and abundance of epibenthic fauna in the North Sea. Journal of the Marine Biological Association of the United Kingdom 79: 385-399.</p> <p>This information has been presented to the MMO, and is noted that the MMO are now satisfied on this issue in the SoCG with the MMO.</p>
<b>Air quality</b>				
EN20	RR-020	WDC and SCC*	<p><b>Air Quality</b></p> <p>a) It is not clear (and how) congestion and queuing at junctions has been accounted for within the modelling. There is a risk therefore that concentrations and impacts will be under-predicted at receptors closest to junctions and the assessment would benefit from greater analysis of those receptors where the highest concentrations and greatest impacts are predicted.</p> <p>b) Further consideration should be given to the full list of mitigation measures described by the IAQM relating to High risk construction sites and these measures should be included in the final Code of Construction Practise or the Air</p>	<p>The air quality modelling is constrained by the traffic data available. Congestion and queuing at junctions has been factored into the traffic model, the traffic data from which emissions have been calculated as an input to the air quality dispersal modelling is configured into periods as follows:</p> <ul style="list-style-type: none"> <li>• AM – traffic data reflecting traffic conditions for the morning peak hours in Lowestoft from 7am to 10am.</li> <li>• Inter Peak – traffic data reflecting the interpeak period hours in Lowestoft from 10am to 4pm.</li> <li>• PM – traffic data reflecting traffic conditions for the evening peak hours in Lowestoft from 4pm to 7pm.</li> <li>• Off Peak – traffic data reflecting the off-</li> </ul>

Issue number	Rep no.	Name	Relevant response	Response
			Quality Management Plan to be adopted for the scheme.	<p>peak period hours in Lowestoft from 7pm to 7am.</p> <p>The traffic modelling incorporated free flow speed with delay applied at junctions, for air quality assessment purposes the speed was adjusted by transport planners following the methodology of Highways England Interim Advice Note 185 to reflect observed speeds. The following steps from IAN 185 were applied to correct the free flow speed to reflect real world speed observations;</p> <ul style="list-style-type: none"> <li>Analyse the performance of modelled traffic speeds on individual road links compared against observed speeds on the same road links.</li> <li>Adjust, where required, modelled traffic speeds on individual road links to better reflect observed speeds; this is known as the “Speed Pivoting” approach.</li> </ul> <p>The speed used for calculating emissions for air quality modelling is the average speed on the road link as advised by transport planning specialists which takes into account delays as relevant to each of the periods above reflecting congestion during peak hours and more free flowing traffic at night.</p> <p>Therefore, there is a variance in the traffic</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>emissions entered into the air quality dispersal model for each period according to the combination of traffic flow, the portion of the flow attributed to Heavy Duty Vehicles and the speed of the vehicles on each modelled road link and the speed for each road link takes into account junctions and the traffic flow on the link.</p> <p>Using the average link speed, average vehicle speeds during traffic congestion will fall. By using period traffic data the change in traffic conditions throughout the day is incorporated into the air quality modelling.</p> <p>Factoring in junctions and congestion is part of the traffic modelling, the traffic data produced is used to calculate emissions per link for each period. This emissions data is entered the air quality model which calculates dispersal from the road links as a line sources in relation to the sensitive receptors taking into account meteorological conditions. Modelled pollutant concentrations at receptors within 200m of a junction are generally elevated due to the relatively higher number of road emissions sources converging within a confined area. The air quality modelling results have been subjected to a verification procedure which compares modelled concentrations of air</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>pollutants to monitored concentrations. This procedure has included monitoring data for locations that represent conditions at junction locations, the verification factor for junctions has been applied to the air quality modelling results for sensitive receptors situated at junctions. See Appendix 8B of the ES (Document Reference 6.3 / PINS document reference APP-168).</p> <p>This matter has been agreed with SCC/WDC in the SoCG.</p> <p>b) The full range of AQ mitigation measures will be agreed with the county planning authority, following consultation with Waveney District Council, pursuant to Requirement 4(1) of the dDCO – the interim CoCP is the starting point for the measures that may be included.</p>
EN21	RR-010	Mr R Cousin	Environmental impact on local residents in regard to air pollution during and after construction.	<p>An assessment of the effects of air pollution upon local residents has been included within Chapter 8 of the ES (document reference 6.1 / PINS document reference APP-136). The construction phase assessment has been reported in paragraphs 8.5.1 through to 8.5.13. In paragraph 8.5.11 it concludes that the construction operations are unlikely to cause a breach of the objective level for airborne particulate matter.</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>A total of 32,395 residential properties have been considered in the operational assessment (i.e. after construction). The assessment has identified that none of these residential properties is predicted to experience air quality that is in breach of the objective level for nitrogen dioxide or particulate matter that is set in the Air Quality Standards Regulations.</p>
Other				
EN22	RR-022	ABP*	<p><u>Environmental Statement</u></p> <p>In ABP's view, the PEIR published by the applicant was incomplete and deficient, failing properly to describe the LLTC scheme and assess its impact on the Port.</p>	<p>The Applicant refutes that the PEIR was incomplete and deficient as it presented the assessment as it was at the time of the statutory consultation.</p> <p>The Preliminary Environmental Information Report ('PEIR'), as its name suggests, was a preliminary document and the Applicant is of the view that it was fit for purpose at the time that it was published.</p> <p>Environmental impact assessment has been carried out subsequently to inform the content of the ES submitted in support of the Application (see document references 6.1 to 6.3 / PINS document references APP-136 to APP-205). The ES includes a full description of the Scheme and of its likely significant</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>environmental effects, including potential impacts on the Port.</p> <p>Section 15.5 of the ES (document reference 6.1 / PINS document reference APP-136) assessed the impact of the Scheme on port operations during both the construction and operational phases. The ES also includes, at Appendix 15A (document reference 6.3 / PINS document reference APP-198) a Vessel Simulation Report. The Application documentation also includes the Applicant's Preliminary Navigation Risk Assessment (document reference 6.7 / PINS document reference APP-208), which appended a Vessel Survey Report.</p> <p>The impact on the Port is under discussion with ABP.</p>
EN23	RR-022	ABP*	<p>Despite advice given by PINS in their Scoping Opinion, issues that should have been assessed in the PEIR were not assessed – and the fundamental deficiencies apparent in the PEIR have been perpetuated in the ES. The applicant has: -</p> <p>(a) Failed to assess “the direct and indirect significant effects of the proposed development”;</p>	<p>The likely significant effects of the Scheme upon the Port have been considered in Chapter 15 of the ES (document reference 6.1 / PINS document reference APP-136) and more specifically in Paragraphs 15.5.5 to 15.5.41.</p>

Issue number	Rep no.	Name	Relevant response	Response
EN24	RR-022	ABP*	(b) Failed to provide an adequate and meaningful baseline scenario in relation to the Port;	<p>The baseline scenario with regard to the Port that the assessment within the ES (document reference 6.1 / PINS document reference APP-136) is based upon is presented in paragraphs 15.4.4 to 15.4.6 as well as within the Vessel Survey Report included as Appendix B to the Preliminary NRA (document reference 6.7 / PINS document reference APP-208).</p> <p>Chapter 4 of the ES, specifically paragraphs 4.2.4 to 4.2.6 also identifies baseline information about the Port.</p> <p>The Applicant continues to seek further information from ABP on current port operations and ABP has recently agreed to provide information on current berth occupancy.</p>
EN25	RR-022	ABP*	(c) Failed to include an outline of the likely evolution of the Port in a no development scenario;	<p>Paragraph 15.5.13 of the ES (document reference 6.1 / PINS document reference APP-136) identifies that there are no detailed development proposals or timescales associated with ABP's vision for an 'East of England Energy Hub' and in paragraph 15.5.39 it concludes that the assessment is based upon the information available at the time of the assessment.</p> <p>The Applicant is in discussion with ABP on this</p>



Issue number	Rep no.	Name	Relevant response	Response
				point with a view to agreeing a potential future scenario for further assessment – for example by testing a particular level of vessel movements associated with the support of offshore windfarm development.
EN26	RR-022	ABP*	(d) Failed to undertake an adequate assessment of alternatives;	<p>The ES (document reference 6.1 / PINS document reference APP-136) has considered alternatives to the Scheme within Chapter 3.</p> <p>The requirements of the EIA regulations are for the Applicant to identify the main alternatives studied by the applicant and the information in the ES meets this requirement. It is also noted that paragraph 4.27 of the National Networks NPS notes that for road schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process – this is set out in the Outline Business Case (document reference 7.4/ PINS document reference APP-107). The NPS notes that it is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken – this is set out in the Outline Business Case and in Chapter 3 of the ES.</p>
EN27	RR-022	ABP*	(e) Ignored the future development of the Port,	Paragraph 15.5.13 of the ES (document

Issue number	Rep no.	Name	Relevant response	Response
			despite the very clear aspirations of ABP, the Local Planning Authority (Waveney District Council), the applicant (Suffolk County Council) itself and indeed, the SoS in his section 35 Direction where he recognises "the Port of Lowestoft's role in being the hub for the off-shore wind farms that are part of the East Anglia Array, a major energy supplier for the UK";	<p>reference 6.1 / PINS document reference APP-136) identifies that there are no detailed development proposals or timescales associated with ABP's vision for an 'East of England Energy Hub'.</p> <p>The ES also identifies that the impacts upon the Port are no greater than slight adverse due to the ability of the Scheme Bascule Bridge to open to allow vessels to pass through – meaning that development west of the Scheme will still be able to take place if it was brought forward by ABP.</p> <p>As noted above, the Applicant is in discussion with ABP on this point with a view to agreeing a potential future scenario for further assessment – for example by testing a particular level of vessel movements associated with the support of offshore windfarm development.</p>
EN28	RR-022	ABP*	(f) Failed to explain and justify its assessment methodology;	The assessment methodology is provided in section 15.3 of the ES (document reference 6.1 / PINS document reference APP-136).
EN29	RR-022	ABP*	(g) Failed to explain how the scheme will be operated which of itself, raises the question as to what actually has been assessed.	A Scheme of Operation is being developed in collaboration with key stakeholders (including ABP) and will set out the basis on which bridge openings will occur. The Applicant anticipates

Issue number	Rep no.	Name	Relevant response	Response
				<p>providing a draft to Deadline 3.</p> <p>The ES (document reference 6.1 / PINS document reference APP-136) assumes that the Scheme Bascule Bridge will not lift during peak AM and PM periods to present a worst-case impact on ABP. Paragraph 15.5.21 of the ES states that “During the AM Peak and PM peak, ABP and their tenants will have to arrange for vessels that require an opening of the Scheme Bascule Bridge to either delay departure or arrival until the peak hour has passed.”</p> <p>In Chapter 16 of the ES (document reference 6.1 / PINS document reference APP-136) it states in Paragraph 16.5.6 how the assessment has been based upon the vessel survey results. The number of openings of the Scheme Bascule Bridge has been based upon the observed number and height of vessels using Lake Lothing in the survey period.</p>
EN30	RR-022	ABP*	(h) Failed to provide a properly and correctly formulated Navigation Risk Assessment.	The Preliminary NRA (document reference 6.7 PINS document reference APP-208) has been prepared to the methodology agreed with the NWG (on which ABP are represented). Further iterations of this assessment will be undertaken as the design develops.

Issue number	Rep no.	Name	Relevant response	Response
				This matter is under discussion with ABP.
EN31	RR-033	Public Health England	<p>The current documentation includes no references to EMF emissions from the site. We recommend that the proposer:</p> <p>a) Identify if the proposed development has electricity generation and/or distribution infrastructure that may result in the emission of electric and/or magnetic fields such that there is the potential for an adverse impact on public health. Where electricity generation and/or distribution equipment is identified an assessment of potential EMF exposures should be included.</p> <p>b) Should the proposer believe that EMF can be scoped out of the assessments they should clearly state their assumptions and rationale in the application for DCO submission. We reserve the right to make additional comments or observations at a future date. Should you have any questions or concerns please do not hesitate to contact us.</p>	Table 5-1 of the ES (page 44) (document reference 6.1 / PINS document reference APP-136) identifies that the assessment of radiation emissions is not applicable as there are no significant emissions of radiation or electro-magnetic frequencies.
EN32	RR-017	Northumbrian Water Limited*	<p><b>Effect on NWL's ability to continue to comply with the Habitat Condition</b></p> <p>– NWL disagrees with the assertion made by SCC that the effects of the Scheme on NWL's land interests would be only slightly adverse during construction and negligible during operation as they result in the permanent loss</p>	The ES (document reference 6.1 / PINS document reference APP-136) in Table 11-4 identified the surveys for terrestrial invertebrates were undertaken on the 26 May, 22 June and 31 July in 2017 of which the five-banded weevil-wasp was one of the species that was identified. In Table 11-5 it was

Issue number	Rep no.	Name	Relevant response	Response
			of an area of required habitat which would prejudice NWL's ability to comply with the Habitats Condition.	<p>presented that the burrowing habitat of the five-banded weevil-wasp burrowing habitat was not within the Order limits of the Scheme and hence won't be affected. Therefore, only supporting habitat will be affected during the construction and operation of the Scheme and with the reinstatement of suitable habitat following construction, and in accordance with the criteria defined in Table 11-2 of the ES, this species of local value is considered to be slightly adversely affected.</p> <p>The Applicant notes that SCC/WDC has agreed "that there is a slight adverse effect on habitat supporting the Weevil-Wasp and consequently replacement habitat for this loss is not required. Furthermore, it is agreed that the management of the remaining habitat in accordance with conditions 10 and 11 of Northumbria Water Limited's planning permission DC12/1391FUL satisfies compliance with these conditions".</p>
EN33	RR-017	Northumbrian Water Limited*	<b>Approach to temporary possession</b> – lack of detail provided on any measures to be taken to relocate existing habitat in the affected area, or on the effects of existing ecology on the site (other than the weevil wasp).	The impact upon the five-banded weevil-wasp is no greater than slight adverse and therefore mitigation measures are not necessary. With regard to other ecology on site, the flora has not been identified as being of conservation importance and therefore does not require relocation. Reptile surveys have been

Issue number	Rep no.	Name	Relevant response	Response
				<p>undertaken on the site, see Appendix 11E (document reference 6.3 / PINS document reference APP-187) and no reptiles were identified on NWL land.</p> <p>Please also refer to the Applicant's response at EN32.</p>
EN34	RR-017	Northumbrian Water Limited*	<p><b>Reinstatement of landscaping and the effects of future access rights</b> – lack of detail regarding how this will be controlled so that the appropriate habitat is reinstated and how that will be protected when SCC exercise their access rights over the land for maintenance of the Scheme.</p> <p><b>Provision for replacement habitat</b> – there does not appear to be any reference in the DCO application for provision of replacement habitat land in relation to the area of NWL land which will be permanently acquired for the purposes of the Scheme, nor any reference confirming a net gain in bio diversity as would be expected for such a project.</p>	<p>The slight adverse impact does not merit the need for replacement habitat. However, as shown in the Landscaping Plans (document reference 2.8 / PINS document references APP-036/037), land within the temporary land take at this location will be reinstated with vegetation suitable for invertebrates.</p> <p>It is also of note that the ES (document reference 6.1 / PINS document reference APP-136) identifies a slight beneficial impact upon reptiles during the operational phase of the Scheme due to the area of suitable habitat that is to be provided at the northern roundabout.</p> <p>Further opportunities to benefit biodiversity will be considered at the detailed design stage in line with the requirements of the Design Guidance Manual.</p> <p>Please also refer to the Applicant's response at EN32.</p>

Issue number	Rep no.	Name	Relevant response	Response
EN35	RR-017	Northumbrian Water Limited*	<p><b>Noise and vibration effects arising from the Scheme</b></p> <p>There is a need for further clarification on a number of areas within the Environmental Statement relating to noise and vibration, including:</p> <p>What mitigation measures have been recommended to protect Trinity House and how these will be secured (particularly given the lack of detail in the Interim Code of Construction Practice);</p>	<p>The Interim CoCP sets out the range of measures that will be included in the full CoCP to control and limit unacceptable noise and vibration. Chapter 6 of the interim CoCP sets out the full range of measures required, including communication measures, monitoring, and practical steps to be taken. The Applicant is liaising with NWL to understand what measures it considers are necessary, given its existing internal noise environment.</p> <p>The Applicant notes the process by which the CoCP will be finalised has been agreed with WDC/SCC, and further that the Applicant has agreed with SCC/WDC to seek consent under S61 of the Control of Pollution Act at the relevant time.</p>
EN36	RR-017	Northumbrian Water Limited*	Assumptions made in relation to operational road traffic noise (for flows < 1000 veh/18-hour);	CRTN criteria screens out road links where flow is modelled to be less than 1,000 vehicles in an 18-hour period. This is due to calculations based upon this level of flow being unreliable. The traffic model has excluded Riverside Road from the assessment in the do minimum scenario due to low flow, but has included the Scheme. Noise levels at NWL in the model will therefore be influenced mainly by Waveney Drive in the do minimum scenario,

Issue number	Rep no.	Name	Relevant response	Response
				and excluding Riverside Road to provide a worst case assessment.
EN37	RR-017	Northumbrian Water Limited*	Reasons for variations in assessment data (such as duration of short term measurements, lack of consistent data collection at all points).	Different data collection periods have been used to account for locations of attended and unattended monitoring. The noise monitoring that was undertaken was agreed with SCC and WDC in advance of it being undertaken (see Paragraph 13.4.2 of the ES (document reference 6.1 / PINS document reference APP-136) and the Applicant considers it to be fit for purpose and representative of the noise sensitive receptors closest to the Scheme.
EN38	RR-020	WDC and SCC*	<p>The Local Authorities should continue working with the applicant and contractors on the development of the Interim/Final Code of Construction Practice into a completed document. In particular the Council concurs with the points raised by SRL Technical Services Limited in their communication dated 5th September 2018, including:</p> <ul style="list-style-type: none"> <li>• the need for additional baseline noise monitoring;</li> <li>• the requirement for prediction and assessment of noise form the construction phase, including careful comparison of predicted noise against existing ambient noise levels;</li> <li>• consideration and assessment of construction</li> </ul>	<p>The extent of baseline monitoring for the purposes of the ES was previously agreed with the local authorities.</p> <p>The need for additional baseline noise monitoring is not considered to be necessary to inform the assessment of significance that is presented in the ES, particularly given the range of mitigation measures presented in the Interim CoCP. The control of noise pollution through Section 61 of the Control of Pollution Act 1974 will also allow WDC to approve the hours of works and provide the Council with a further element of control.</p> <p>A separate assessment of construction noise</p>



Issue number	Rep no.	Name	Relevant response	Response
			<p>activities against eligibility thresholds for noise insulation in accordance with BS5228; and</p> <ul style="list-style-type: none"> <li>• identification and assessment of any other sources of noise that will be associated with the operational phase, including alarms.</li> </ul> <p>The detail of the Code of Construction Practice (such as existing ambient noise levels; Threshold Noise limits; working hours; assessment of the air quality impacts from construction HGVs; etc) cannot be agreed until definitive details of the project are known and the final Code of Construction Practice is in development. We do not rule out the possibility that Control of Pollution Act 1974 s61 applications (Prior consent for work on construction sites) would be required for any of the works.</p> <p>This approach avoids prematurely committing the scheme to detailed controls based on the current level of available detail.</p>	<p>based upon SCC and WDC request to use BS5228 is being undertaken and will be discussed with those parties with the aim of reaching agreement on this matter. The parties are however agreed consent would be sought under s61 of the Control of Pollution Act 1974, and thus noise and vibration mitigation measures can be finalised at this stage of the process when final details of construction methodologies are known.</p> <p>It has been agreed with WDC and SCC, as outlined in the SoCG, that the Code of Construction Practice is an appropriate tool to control the construction phase of the Scheme and that final details of any monitoring and mitigation measures that are agreed to be necessary will be incorporated into the final Code of Construction Practice, as is provided for in the text of Chapter 6 of the Interim CoCP.</p> <p>An assessment of the likely noise arisings from any traffic signals on the Scheme Bascule Bridge is presently ongoing, although it is not considered likely to result in a significant effect.</p> <p>This matter has been agreed with SCC/WDC in the SoCG.</p>

Issue number	Rep no.	Name	Relevant response	Response
EN39	RR-020	WDC and SCC*	<p>Amend the recommendation by adding an additional paragraph for Noise to read:</p> <p>10) If planning permission is granted, a full review of eligibility for further sound insulation under the NIR must be completed to protect the future amenity of the most affected residential receptors.</p>	<p>The Applicant is fully aware of its obligations as a highway authority under the Noise Insulation Regulations 1975, with which it will continue to comply. As they are a legal obligation, no explicit reference is needed to them in the DCO or the interim CoCP.</p> <p>This matter has been agreed with SCC/WDC in the SoCG.</p>
EN40	RR-020	WDC and SCC*	<p><b>Ecology</b></p> <p>a) greater clarity on the role of ecology should be included in the DCO or its supporting documents and enhancements should be planned, agreed and implemented;</p>	<p>Discussions have been held with SCC's Ecology department regarding how to enhance bio-diversity benefits on the Scheme and the DGM is being updated to reflect this (document reference 7.6 / PINS document reference APP-133).</p> <p>This matter has been agreed with SCC/WDC in the SoCG.</p>
EN41	RR-023	Broadland Housing Group*	<p>We would also welcome the opportunity for a specific resident community group to be implemented to engage with the process and provide a forum to voice any concerns or provide useful input into the project to ensure their views are taken into consideration.</p>	<p>As outlined in the Interim CoCP (Appendix 5A of the Environmental Statement (document reference 6.3 / PINS document reference APP-163) a full construction communications plan will be put in place prior to construction commencing. A communications officer will be in place throughout the detailed design and construction phases to ensure engagement with residents, businesses and stakeholders. The communications officer will prepare the stakeholder and community engagement plan which will be developed in consultation with the</p>

Issue number	Rep no.	Name	Relevant response	Response
				county planning authority and Waveney District Council.
EN42	RR-010	Mr R Cousin	What programme of assistance/advice is going to be put in place specifically for local residents affected by noise/damage.	As outlined in the Interim CoCP (Appendix 5A of the ES (document reference 6.3) / PINS document reference APP-163)) a full construction communications plan will be put in place prior to construction commencing. A communications officer will be in place throughout the detailed design and construction phases to ensure engagement with residents, businesses and stakeholders. The communications officer will prepare the stakeholder and community engagement plan which will be developed in consultation with the county planning authority and WDC.

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## 6 Compulsory acquisition and other land matters

### 6.1 Overview

- 6.1.1 Sixteen interested parties raised issues on compulsory acquisition and other land matters for the Scheme. Table 6-1 provides the matters raised on the theme, alongside a response from the Applicant.
- 6.1.2 Many of these issues are specific to the parties and their land interests. The Applicant has engaged with these parties, and will continue to do so throughout the examination.

## 6.2 Key issues

Table 6-1: Matters raised on compulsory acquisition and other land matters

Issue number	Rep no.	Name	Relevant response	Response
LD1	RR-022	ABP*	<p><u>Compulsory Acquisition</u></p> <p>The compulsory acquisition of land and rights within ABP's statutory port estate will act to the serious detriment of the port undertaking, leading directly to:</p> <p>(a) The loss of existing berth space within the Port's Inner Harbour;</p> <p>(b) A detrimental impact on existing Port operations to the east of the LLTC;</p> <p>(c) The loss of port utility to the west of the proposed LLTC;</p> <p>d) The need for an emergency berth to the east of the LLTC within the Inner Harbour;</p> <p>(e) The bisection of the Inner Harbour, damaging ABP's ability to secure further business from the offshore wind sector; and</p> <p>(f) The consequent prospect of the deflection of future business from the Port – not just offshore wind, but including aggregates, agri-bulks, general cargos, offshore oil and gas – to competitor ports.</p>	<p>The DCO includes powers to enable the Applicant to acquire land, and to create and acquire new rights (including the right to impose restrictive covenants) over land, and to occupy and use land temporarily for the purposes of constructing, operating and maintaining the Scheme.</p> <p>As ABP is aware, in its capacity as a statutory undertaker, ABP enjoys a degree of protection from the exercise of such powers to acquire land compulsorily and to use land temporarily. That protection will derive from the protective provisions included in the DCO (see Part 5 (For the Protection of the Harbour Authority) of Schedule 13 (Protective Provisions) to the draft DCO (document reference 3.1 / PINS document reference APP-005)).</p> <p>These protective provisions set out that the temporary possession or acquisition of any land or acquisition of rights over any land within ABP's port estate can only take place with the consent of the harbour authority (such consent not to be unreasonably withheld and with an arbitration mechanism to resolve any disputes).</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>Where such land use or acquisition is necessary to facilitate the delivery of the Scheme, any detriment arising or expected to arise will need to be subject to assessment in order to determine appropriate levels or forms of mitigation and compensation, to be provided in accordance with the principles of reinstatement enshrined in the Compensation Code.</p> <p>The dDCO, including Protective Provisions, as well as a Side Agreement are under discussion with ABP.</p> <p>The Applicant welcomes ABP's contribution to the process of identifying the likely impacts of the Scheme, for the purposes of quantifying any loss arising from those impacts and identifying appropriate and proportionate forms of mitigation or compensation. The Applicant would like to agree such matters with ABP as early as possible during the Examination, to enable the Examining Authority to present a settled position in its Report of Recommendation to the Secretary of State at the close of the Examination.</p> <p>Incidentally, land-take for the purposes of the Scheme (both permanent and temporary) has been assessed to ensure that no more land</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>than is necessary for the delivery of the Scheme is included within the Order limits (see Chapter 15 of the ES (document reference 6.1 / PINS document reference APP-136) and the Book of Reference (document reference 4.3/ PINS document reference APP-009, which was updated and submitted to the Planning Inspectorate 8 October 2018, document reference OD-002), and the Statement of Reasons (Applicant Document Reference 4.1/ PINS Document Reference APP-007); the latter of which sets out the Applicant's view on why a serious detriment has not been caused.</p> <p>In relation to the specific issues raised by ABP:</p> <p>(a) and (b) The ES has assessed that the loss of berth space would have a slight adverse effect on ABP's operations, given current usage of the Port and the amount of berth space to be taken. The Applicant awaits further information as to current and future berth statistics from ABP, but on current information, it is not considered that serious detriment is caused.</p> <p>(c) The Scheme is an opening bridge, and so there is no loss of port utility west of the Scheme - as vessels will still be able to access it.</p> <p>(d) The Applicant has discussed the need for</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>an Emergency Berth with ABP and does not consider that such a berth is required, and that the matter can be dealt with through the Scheme of Operation.</p> <p>(e) The Scheme is an opening bridge with a 12m air draft. As such, the Crew Transfer Vessels (CTV) which currently use the Port of Lowestoft, which require less than 11.5m air draft (the basis of the assessment presented in the Vessel Survey (document 6.7, Appendix B / PINS document reference APP-208), will be able to pass under the bridge. Even in a scenario where this was not the case, the bridge would be able to open for them.</p> <p>(f) The Applicant awaits evidence from ABP that this will be the case - as an opening bridge the Applicant does not consider that ABP's case on this point is made out.</p> <p>These matters remain under discussion with ABP.</p>
LD2	RR-022	ABP*	<p><u>Serious Detriment</u></p> <p>The LLTC Scheme as currently promoted will, without adequate and satisfactory mitigation, act to the "serious detriment" of ABP as statutory port undertaker. The SoS will not be in a position, unless the scheme is suitably modified and mitigated, to authorise the</p>	<p>As noted above (see LD1), although the dDCO does include powers of compulsory acquisition, pursuant to the protective provisions for the benefit of ABP as statutory harbour authority, such powers within the port estate are subject to the consent of ABP (such consent not to be unreasonably withheld and with an arbitration mechanism to resolve any disputes).</p>



Issue number	Rep no.	Name	Relevant response	Response
			compulsory acquisition of the land required for the scheme.	<p>As noted in the Statement of Reasons, it is the Applicant's view that the compulsory acquisition of land proposed for the Scheme does not cause a serious detriment to ABP's statutory undertaking.</p> <p>The Applicant is aware that the case of 'serious detriment' has been particularly considered by the Examining Authorities in the Able Marine Energy Park, Richborough and Hinkley Point Connection DCOs.</p> <p>Paragraph 9.9.101 of the Richborough Recommendation Report noted that the term 'serious detriment' goes beyond just 'detriment', and that something would be 'serious' if it was 'important or significant'. All of these cases have involved the statutory undertaker seeking to make the case that the land affected by the Scheme is <u>required</u> for the current and/or future use of the Port's undertaking and that there is a paramount need for the affected land to be retained (see, for example, Hinkley Connection Recommendation Report paragraph 8.5.276 and Able Marine Recommendation Report paragraphs 18.200 – 18.206).</p> <p>To date, ABP have not demonstrated this to the Applicant such that a replacement site has</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>been required to form part of the application (as per section 127(3) of the Planning Act 2008).</p> <p>The impact of the Scheme on the Port, and therefore the necessity for further mitigation measures remains under discussion with ABP.</p>
LD3	RR-013	Anglian Water Services Ltd*	<p>Connections to public sewerage networks: Anglian Water is not aware of any requirements made upon them for a foul connection(s) to the public sewerage network for the above project. We understand that a number of surface water connections to the public sewerage network are required for the operational phase of the above project. We have had constructive discussions with the applicant regarding the proposed surface water strategy and are supportive of the strategy in principle subject to confirmation of agreed discharge points being provided.</p>	<p>The Applicant welcomes the response from Anglian Water.</p> <p>A foul connection will be required to the Control Tower; this will be sought during the detailed design of the Scheme, pursuant to Anglian Water's protective provisions.</p>
LD4	RR-018	Statuslist Limited*	<p>Location and design of the New Access Road Statuslist is concerned that the Council has failed to demonstrate that the use of the Land is in fact required for the New Access Road. There is no evidence that the Council has considered alternative options that would not impact on the Land or, if such options have been considered, the reasons why they have been rejected. The position of the New Access</p>	<p>Alternatives to the New Access Road were presented in the PEIR and are also included in the Environmental Statement – please refer to 3.7.18 to 3.7.23 therein.</p> <p>The Applicant considers the New Access Road to be fully compliant with local policy and thus the nature and scale of the road that is being proposed for the Scheme would be</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>Road as shown in the Design Report (page 107) of the documents accompanying the DCO is not considered optimal.</p> <p>The New Access Road will bisect the Land and will impact on the current and future use of the Land by Statuslist. In particular, Statuslist is concerned that the position of the proposed New Access Road will materially reduce the density of development capable of being achieved on the Land on a permanent basis.</p> <p>The industrial and commercial use of land located to the west of the Land requires access for a car transporter (amongst other things). However, this will have a negative effect on the Land, as it significantly increases the road geometry requirements, over and above what would normally be required for emergency or servicing vehicles. This is not only “land hungry”, requiring a greater area of land to be acquired from Statuslist by the Council, diminishing the level of development quantum capable of being achieved on the Land, but also impacts on the character of the road design and the types of frontage development likely to be achieved. Both of these factors are detrimental to the future use and development of the Land.</p>	<p>comparable to that which the landowner would otherwise need to provide themselves.</p> <p>The Applicant notes that SCC/WDC has agreed in its SoCG that the design of the New Access Road “is appropriate having regard to the nature and scale of development that it is envisaged to serve” and further that “the New Access Road is located in such a way to facilitate the regeneration of the former Jeld-Wen site, as envisaged in WDC’s Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief (2013).”</p> <p>The Applicant has been in discussions with Statuslist for some time and took due consideration to the alternative positions of the New Access Road, having regard to Statuslist’s development proposals. Indeed following representations from the landowner, the Applicant decided to undertake additional targeted S42 consultation in order to provide flexibility for the proposed Access Road to move further eastwards to accommodate a more easterly alignment of this road (as documented in Table 29 of the Consultation Report). It is understood that Statuslist would prefer a more easterly alignment still, but it has been explained to Statuslist that should this be the case, the visibility splays required for such</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>Statuslist has submitted previous design and location options for the New Access Road to the Council for consideration, which it considers would be optimal, balancing the provision of suitable access for the purposes of the Scheme whilst minimising the negative impact on the use of the Land.</p> <p>Unfortunately, the alternative design proposals submitted have not been accepted by the Council. As a result, Statuslist continues to have serious concerns as to the permanent impact of the New Access Road on the use of the Land.</p> <p>It is considered that the route proposed for the New Access Road by the Council will inhibit the future use of the Land and will negatively impact on the design and density of development capable of being undertaken on the Land. The end result is that the location and design of the New Access Road is not optimum and should be reconsidered as part of the DCO process, with the alternative routes proposed by Statuslist evaluated and adopted by the Council as part of the Scheme.</p>	<p>an alignment would then encroach on neighbouring third party land. The Applicant does not consider it a proportionate use of compulsory acquisition powers to interfere with these rights.</p> <p>The Applicant does not envisage that a car transporter would be using the New Access Road. It should be noted that access to Lings' premises would be from Waveney Drive. The Applicant has provided for a New Access Road to the specification required to mitigate the loss of access to Riverside Business Park, and without knowledge of the internal layout for Statuslist's development proposals as there is no agreed masterplan/planning application/permission for the site and in consequence the requirements of the future development remain unclear. That said the Applicant is in discussion with Statuslist over the design of the New Access Road and it may be possible to revise the road geometry to take account of Statuslist's concerns, and still meet the requisite highway design/safety standards.</p>
LD5	RR-018	Statuslist Limited*	<p>Temporary acquisition of Plots 3-16, 3-59, 4-01 and 4-04 for the New Access Road.</p> <p>It is understood that the above plots are</p>	<p>Plot 3-16, adjacent to Lake Lothing is identified for a construction compound. Plots 3-59, 4-01, 4-04 show extended areas of temporary land</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>proposed to be temporarily acquired by the Council for the purposes of use during the construction of the New Access Road and wider Scheme. The temporary use will include the erection of a construction compound within Plot 3-16.</p> <p>Statuslist is seriously concerned that the temporary acquisition of the relevant plots will have a detrimental impact on the use of those parts of the Land as part of its own use and development of the Land.</p> <p>In particular, it is anticipated that the temporary acquisition would negatively impact on the phasing of and timescales for carrying out such development and could in a worst case scenario prevent development altogether.</p> <p>It is imperative that the temporary use of the relevant parts of the Land is only consented where any adverse impact on the use and development of the Land are avoided, or minimised to the greatest extent possible.</p>	<p>take because they currently host large sheds which require removal to construct the New Access Road – and evidently it is not possible to remove part of a shed, as such the Order limits must extend to full extent of the structure to be removed.</p> <p>The Applicant remains in discussion with Statuslist on matters of phasing, but notes that the freehold landowner, Statuslist, is not in occupation, and while the land is subject to a historic lease to Rentokil the land is surplus to their requirements and therefore sits mostly vacant with only sporadic use and occupation of the land and buildings. Furthermore, the Applicant is likely to commence its construction works for the New Access Road a year in advance of Statuslist (owing to the term of the existing rental agreement) – and thus for the reasons explained above, much of plots Plots 3-59, 4-01, 4-04 would no longer be required by the Applicant.</p> <p>The Applicant cannot envisage any scenario where development is prevented altogether.</p>
LD6	RR-018	Statuslist Limited*	<p>Impact on utilities and infrastructure</p> <p>The design and construction of the New Access Road will impact on the utilities and other infrastructure currently serving the Land</p>	<p>The Applicant is working with the utility suppliers with apparatus in the area that could be affected by the Scheme and appropriate protective provisions are included in the dDCO.</p>

Issue number	Rep no.	Name	Relevant response	Response
			and those required as part of any development proposals brought forward in the future. It is not clear the extent to which the impact on such services has been factored into the design and phasing of works for the New Access Road if at all. Statuslist is concerned that failure in this regard will negatively impact on the use of the Land and may restrain or prohibit development of the Land in the future."	<p>Discussions with the respective utility providers to date indicate that the New Access Road will be used to lay connections for low pressure gas (Cadent), low voltage electricity (UKPN) and potable water (Essex &amp; Suffolk Water). These works are required to ensure there is continuity of supply in these services to premises in Riverside Business Park (whose services are currently laid in Riverside Road and need to be diverted). Whether the respective utility provider determines that services laid in the New Access Road should provide additional capacity to cater for future development would be a matter for them.</p> <p>Once the New Access Road is opened to the public it would be subject to the provisions of the New Roads and Street Works Act 1991 which regulate the use by statutory undertakers, and others, of highways for the purposes of apparatus. As such the Applicant does not accept that there would be restraint to the development of the land in the way suggested by Statuslist's representation.</p>
LD7	RR-018	Statuslist Limited*	<p><u>Disruption during construction of the Scheme</u></p> <p>In addition to the adverse impacts following completion of the Scheme, it is important to</p>	The Applicant is in discussion with Statuslist, recognising their ambitions to bring forward their land for development, in order to minimise disruption to that endeavour. The Applicant

Issue number	Rep no.	Name	Relevant response	Response
			<p>note the significant problems that will arising during the construction of the Scheme.</p> <p>During the construction of the New Access Road and wider Scheme, it is likely that there will be widespread disruption on and in the vicinity of the Land. The timescales are also likely to coincide with Statuslist's own timeframe for the development of the Land. There is every potential that the undertaking of the works, and associated temporary possession of the relevant plots during that period, will restrict and negatively impact on Statuslist's use of the Land. It is clearly essential that the timescale for the Scheme and methods of working employed do not interfere with or prevent the use and development of the Land.</p>	<p>would highlight that the freehold landowner, Statuslist, is not in occupation. The land is subject to a historic lease to Rentokil, to whom the land is surplus to requirements and therefore sits mostly vacant with only sporadic use and occupation of the land and buildings. It is understood the lease does not expire until December 2020 and as such Statuslist is unlikely to be in occupation until that time.</p> <p>Consequently, with the Applicant anticipating commencing construction approximately a year in advance of Statuslist, the overlap between the two construction activities will be limited, if at all. Nevertheless, the Applicant is in active negotiation with Statuslist in particular on the timescales and phasing for its development.</p> <p>Further clarity has been requested by the Applicant from the landowner in respect of their masterplan and proposed development programme for the site and the Applicant will continue its attempt to work collaboratively with the landowner in accommodating those development proposals where possible, whilst adhering to highway design standards and statutory DCO timescales.</p> <p>The Applicant has also sought further clarity in respect of any operational or commercial</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>concerns that the landowner might have in respect of the Applicant's proposed temporary construction compounds.</p> <p>The Applicant can confirm that both parties are actively working towards achieving a Land and Works Agreement that assists the landowner in mitigating any and all concerns, whilst enabling each party's construction activities to co-exist where possible.</p>
LD8	RR-026 RR-027 RR-029 RR-031 RR-032 RR-036 RR-037	Hitech Grand Prix Limited*  Lift Truck Rentals Limited*  Nexen Lift Trucks Limited*  Oakes Recruitment Limited*  Overseas Interests Inc*  Team Oakes	<p>At this stage, our clients' primary concerns may be summarised as follows, although our clients fully intend to submit full written representations supported by technical reports in due course once the examination begins: The operation of our clients' site requires HGVs to turn left immediately upon entering the site and to pass the west side of the building to make use of the weighbridge. HGVs do not pass the south side of the building as this is the area in which the car park and main personnel access is situated.</p> <p>This arrangement is crucial to ensure that HGV movements do not conflict with car traffic. HGVs leaving the property will turn and follow a route around the northern and western sides of the building to again make use of the weighbridge and avoid any conflict with cars</p>	<p>The Applicant considers that the proposed access arrangements to the Nexen site following construction of the Scheme are appropriate and will not lead to a reduction in the ability for the affected parties to access their site.</p> <p>Specifically, vehicular tracking for larger articulated vehicles has been undertaken by the Applicant (and provided to the landowner) indicates that vehicular movements around the site can continue as they do today without hindrance to operations.</p> <p>The Applicant would highlight that the Engineering Section Drawings Mainline Long Section Sheet 2 of 2 (document reference 2.9 / PINS document reference APP-041) shows a clearance of approximately 6.6m in to the</p>



Issue number	Rep no.	Name	Relevant response	Response
		Limited*  Waveney Fork Trucks Limited*	<p>and pedestrians. Our clients' consider that the positioning and alignment of the proposed Third River Crossing will severely interfere with our clients' businesses.</p> <p>We understand the only modelling that has taken place in relation to vehicle movements in and out of the Land once the scheme has been constructed is for rigid body vehicles whereas our clients need access to the property for larger articulated vehicles.</p> <p>Although plan 1069948-WSP-HML-LL-DR-CH-0201 indicates a minimum headroom of 5.3 metres for the proposed underpass to access the Land once the proposed project has been constructed this does not cater for all of the vehicles which our clients need to access the Land (notwithstanding our clients' concerns regarding access during the construction period). These vehicles include a Yale GDP160 diesel fork truck (closed height on a special step frame low-loader for road transport: 5465mm) and a SMV SL37 top loader container handler (closed height on the ground: 6200mm and Maximum width of machine: 6030mm). The vehicles in question are laden container handling machines and large counter balance machines. These vehicles need to access our clients' site</p>	<p>Nexen site. Additionally, the Applicant notes that there is an existing height restriction of approximately 6.1m on Riverside Road due to a telecoms cable.</p> <p>Notwithstanding the above, the Applicant remains in discussion with these affected parties over the access arrangements to the site and will update the ExA in due course.</p>

Issue number	Rep no.	Name	Relevant response	Response
			between 15 – 20 times per year. Our clients anticipate that “de-masting” these vehicles either side of the proposed bridge shall result in significant cost which our clients shall have to incur in perpetuity as a result of the proposed project in connection with local short term movements of such equipment, if indeed our clients can continue to suitably operate from the property as a result of the proposed project.	
LD9	RR-026 RR-027 RR-029 RR-031 RR-032 RR-036 RR-037	Hitech Grand Prix Limited*  Lift Truck Rentals Limited*  Nexen Lift Trucks Limited*  Oakes Recruitment Limited*  Overseas Interests Inc*  Team Oakes	The draft development consent order does not provide any details on how any permanent rights for our clients to access the Land shall be secured in perpetuity and how these rights may be affected or interfered with during the construction phase or subsequently for maintenance or for access to the structures erected as part of the proposed project.	<p>The draft DCO does not stop up the existing access to Nexen's land, and so Nexen will continue to be able to use it.</p> <p>The Applicant is in discussions with Nexen about the detail of managing construction impacts on their business including access, with the aim of reaching a Land and Works Agreement, but notes that the Interim CoCP imposes a requirement on the Contractor to maintain access to Nexen during the construction phase.</p> <p>The Applicant notes that plot 3-29, which is a 'rights' plot proposed to be acquired for the purposes of protecting and maintaining the new bridge in the long term and in connection with the diversion, protection and maintenance of statutory undertakers' apparatus, includes</p>

Issue number	Rep no.	Name	Relevant response	Response
		Limited*  Waveney Fork Trucks Limited*		the access to the Nexen site. The need and justification for such plots is explained in chapter 11 of the Statement of Reasons (document reference 4.1/PINS document reference APP-007).  The Applicant is however working with Nexen to develop a Land and Works Agreement to develop mechanisms for managing the practical utilisation of such rights on Nexen's access to the site.
LD10	RR-026 RR-027 RR-029 RR-031 RR-032 RR-036 RR-037	Hitech Grand Prix Limited*  Lift Truck Rentals Limited*  Nexen Lift Trucks Limited*  Oakes Recruitment Limited*  Overseas Interests Inc*	The area identified as Plot 3-56 on the Land Plan Sheet 3 of 5 (1069948-WSP-LSI-11LL-DR-GI-0004) has been identified as an area of the Land identified for temporary acquisition. There is no explanation given in the draft DCO as to why this area of land has been so identified.  This Plot 3-56 is an area of the Land which our clients have long identified for future development proposals. Our clients have real concerns that the proposed temporary acquisition of this Plot 3-56 shall stifle these development aspirations and the construction of the proposed project shall impact on these proposals in the future. This is particularly so without any details of why this area of land is proposed to be temporarily acquired, the	The Statement of Reasons (document reference 4.1/PINS document reference APP-007). confirms the purpose of this plot is to provide working space for the construction of the new A12 Lake Lothing Third Crossing, and to provide temporary additional operational space for adjoining business premises during the construction period. The Applicant has sought, pending further discussions with the affected landowners, flexibility in the Land Plans to provide compensatory space for Lings to mitigate the effects of additional land take from them during construction.  Plot 3-56 is currently unused scrubland, though the Applicant understands that the landowner (Nexen) has ambitions to bring forward development on this land. However no

Issue number	Rep no.	Name	Relevant response	Response
		Team Oakes Limited*  Waveney Fork Trucks Limited*	<p>specification of works that Suffolk County Council intends to carry out on this area of land or any indication as to how long the temporary acquisition of this part of our clients' property shall endure.</p> <p>Our clients have a real concern that the area identified as Plot 3-56 shall be effectively severed due to the gating and access requirements of our clients' existing businesses – notwithstanding our concerns as to whether these may be suitably accommodated in light of the proposed project. Indeed, our clients have concerns that any joint access arrangements between our clients' existing business operations and the proposed development land using the proposed underpass set out in the submitted scheme would be potentially unsound from a highway safety perspective, practically unworkable and be contrary to our clients' established practice of separating HGV and car traffic/pedestrians as far as possible.</p>	<p>planning application or planning permission exists and as such the Applicant does not consider the use of this land temporarily in the short term would compromise development aspirations for this site. Indeed, dependent on any works necessary to support Lings' use of this land, temporary occupation of the land could be advantageous to Nexen by virtue of the condition in which the land is returned to Nexen. This matter remains under discussion</p> <p>The Applicant notes there is a supposition in Nexen's representation that both a second access to plot 3-56 is required to bring it forward for development and that in a no-scheme world that such an access could be obtained to the Riverside Road.</p> <p>Notwithstanding that these matters have not been fully explored, the Applicant has provided to Nexen an alternative access strategy to the site which would address these points for their consideration.</p>
LD11	RR-026 RR-027 RR-029	Hitech Grand Prix Limited*  Lift Truck Rentals Limited*	Our client Overseas Interests Inc has private property rights to use estate road shown as Plots 3-57 and 3-32 on the Land Plan Sheet 3 of 5 (1069948-WSP-LSI-LL-DR-GI-0004) and it appears that the proposed project shall frustrate the beneficial use of these rights,	<p>No evidence of such rights is apparent on title information and no such rights were identified by the landowner when completing their Land Interest Questionnaire.</p> <p>The Applicant notes the landowner's</p>

Issue number	Rep no.	Name	Relevant response	Response
	RR-031 RR-032 RR-036 RR-037	Nexen Lift Trucks Limited* Oakes Recruitment Limited* Overseas Interests Inc* Team Oakes Limited* Waveney Fork Trucks Limited*	particularly to facilitate the development of the area identified as Plot 3-56 referred to above. Indeed, submitted plan 1069948-WSP-HAC-LL-DR-CH-0003 identifies this private means of access to Riverside Road as being stopped up as part of the proposed project which would frustrate a separate access to our clients' proposed development land using this route.	aspirations in respect of the site earmarked for development though understands that no planning permission has been granted for any development of the site, which shares a single point of access with the landowners' main operational site.
LD12	RR-026 RR-027 RR-029 RR-031 RR-032 RR-036	Hitech Grand Prix Limited* Lift Truck Rentals Limited* Nexen Lift Trucks Limited* Oakes	The extent of the land shown as required for permanent acquisition of land and rights on Land Plan Sheet 3 of 5 (1069948-WSP-LSI-LL-DR-GI-0004) shown as Plots 3-29 3-30 appears to create a high probability that the current approach for vehicular movements shall not be preserved, certainly during the construction period. Indeed, there is a lack of certainty on how any future gating arrangements for our clients' property shall affect vehicle movements in and out of the property given the proposed permanent	As noted above, the Applicant has provided Nexen with vehicular tracking information to illustrate that current movements can continue to be made for its consideration and comment. The Applicant also advises that the interim CoCP imposes a requirement on the Contractor to maintain access to Nexen during the construction phase (paragraph 2.7.1). As stated above, the Applicant is aware of the need for continued access to the site during construction and considers that this matter will best be resolved through dialogue during the

Issue number	Rep no.	Name	Relevant response	Response
	RR-037	Recruitment Limited*	acquisition of land at the point of current access.	construction process to coordinate the Scheme works with the businesses' requirements. This matter remains under discussion.
		Overseas Interests Inc*	Our clients' business operations depend heavily on meeting delivery deadlines for orders received and continued operation relies on customers having confidence in the ability of our clients to achieve these.	
		Team Oakes Limited*		
		Waveney Fork Trucks Limited*	Any interruption to continuous access to the property in the manner required threatens not only existing contracts but also future work. Interruption to continuous access has the potential to have severe consequences for our clients' businesses.	
LD13	RR-026	Hitech Grand Prix Limited*	We have concerns that alternative alignments of the proposed project and different access solutions to our clients' Land have not been suitably considered prior to submission of the DCO application. Our clients remain willing and open to adjustments to the proposed project to deal with our clients concerns but at this stage we have no comfort that this shall be possible within the limits of deviation of the submitted scheme.	There have been extensive discussions with Nexen on this topic to date, and for the reasons explained above, the Applicant considers and has evidenced through provision of information to Nexen the access proposals to the site, particularly in respect of height clearances and turning movements are adequate and appropriate for the current business operations.
	RR-027	Lift Truck Rentals Limited*		
	RR-029			
	RR-031	Nexen Lift Trucks Limited*		
	RR-032		Our clients have not been given comfort that alternative access solutions to our clients' Land have been fully explored as solutions to our clients' concerns. Particularly our clients	For this reason potential alternative access arrangements through neighbouring third party land which would interfere with those business operations are considered to be a disproportionate use of DCO powers.
	RR-036	Oakes Recruitment Limited*		
	RR-037			

Issue number	Rep no.	Name	Relevant response	Response
		Overseas Interests Inc*  Team Oakes Limited*  Waveney Fork Trucks Limited*	consider that an access along the eastern edge of the land owned by PFK Ling Limited has not been suitably considered before the submission of the DCO application.	
LD14	RR-026 RR-027 RR-029 RR-031 RR-032 RR-036 RR-037	Hitech Grand Prix Limited*  Lift Truck Rentals Limited*  Nexen Lift Trucks Limited*  Oakes Recruitment Limited*  Overseas Interests Inc*  Team Oakes Limited*	Our clients have serious concerns about the continued operation of their businesses during the construction period.	<p>The Applicant recognises that the construction of the Scheme has the potential to cause disruption to existing business activities in this location, and consequently remains in discussion with the parties to reach agreement such that the parties' respective activities are compatible.</p> <p>The Applicant understands the particular need to retain safe access to the site to allow timely loading/unloading of materials and access to the site weighbridge and is confident these matters are resolvable through further negotiations, and critically regular communication during the construction phase in order to assist the landowner in their duty to mitigate any losses.</p> <p>The Applicant also notes the commitments in the interim CoCP that the Contractor must allow access from the public highway to Nexen</p>

Issue number	Rep no.	Name	Relevant response	Response
		Waveney Fork Trucks Limited*		Trucks (paragraph 2.7.1) and that a construction communications plan must be produced to ensure engagement with businesses (paragraph 2.10.2).
LD15	RR-011	B.S Pension Fund Trustee Limited*	<p>One of key concerns is to ensure that the value of BSPF's asset is properly protected in respect of potential impact from the construction and operation of the Lake Lothing Third Crossing. From a review of the application material provided, the project has the potential to adversely affect:</p> <ul style="list-style-type: none"> <li>• access to the unit let to Wickes by customers on foot and in vehicles;</li> <li>• delivery and other service access to the unit currently let to Wickes by small and large vehicles; and</li> <li>• the amenity enjoyed by its current and potential future tenants as a result of noise, odour, dust and traffic disruption caused during the implementation of the proposed development consent order (DCO).</li> </ul> <p>BSPF would object to the inclusion in the DCO of powers for the compulsory acquisition of land or rights that BSPF has an interest in given the current economic importance of protecting pension fund assets in the UK.</p>	<p>The Applicant would highlight that no proposals are being made that would materially affect or change the access to Wickes or any other part of the Landowner's interest.</p> <p>It is acknowledged that the Third Crossing would result in a significant increase in traffic on Peto Way since it links directly to the Third Crossing. However, these increases have been modelled and the highway network is shown to satisfactorily accommodate this increase –please refer to the junction assessment for junctions 12 (Peto Way / Denmark Road / Barnards Way) and 13 (Denmark Road / Rotterdam Road) in sections 8.12 and 8.13 of Transport Assessment (document reference 7.2/PINS document reference APP-093) which confirms they continue to perform satisfactorily in both the design year (2022 and future year (2037).</p> <p>Additionally, the Scheme will provide improved accessibility to customers on foot and in vehicles from the south of the town once</p>



Issue number	Rep no.	Name	Relevant response	Response
				<p>operational.</p> <p>With regard to noise, Figure 13.3 (document reference 6.2/ PINS document reference APP-152) shows that the opening year traffic noise at the entrance to Wickes will increase by a 'minor' amount (i.e. between 1.0 and 2.9db) and the south western corner will be subject to a major increase of +5dB. However, this is not considered to be detrimental to the operation of the business given its nature.</p> <p>With regard to odour, the Environmental Statement (document reference 6.1/PINS document reference APP-136) does not consider odour due to none being likely during the construction or operation of the Scheme. Dust has been considered in the air quality assessment in the Environmental Statement which reports that as a worst case, dust will be restricted to within 50m from the Order limits and with mitigation in place will be no greater than slight adverse to those most sensitive receptors.</p>
LD16	RR-011	B.S Pension Fund Trustee Limited*	BSPF is prepared to enter into in to a voluntary agreement with the promoter of the DCO to enable plot 1-04 to be acquired to facilitate the construction and operation of the Lake Lothing Third Crossing subject to the agreement of	Discussions between the Applicant, landowner and their respective agents is ongoing and the Applicant welcomes the landowner's receptiveness to acquisition of land by agreement.

Issue number	Rep no.	Name	Relevant response	Response
			<p>appropriate terms. BSPF's costs of engaging with the promoter on this agreement and the CPO process must be comprehensively covered to protect the interests of the subscribers to the pension fund.</p> <p>Such an agreement must also regulate the time at which the land will be acquired to provide certainty for BSPF on the future of this important asset. It will also address the amenity, operational and value issues raised in the bullet points set-out above.</p> <p>BSPF notes it has begun to engage positively with the promoter in relation to agreeing an undertaking for its CPO adviser's fees and has received heads of terms for a Land and Works Agreement. However the promoter has not progressed these documents in a timely manner, engaged in negotiations with BSPF, or responded to the initial points raised by BSPF on these documents despite several months having elapsed.</p> <p>BSPF notes that promoter is under a duty to take reasonable steps to acquire a property by agreement before doing so by compulsion (para 2 DCLG 2015 Circular). It shall object to the acquisition of its land by compulsion unless the promoter is willing to engage in through,</p>	<p>Reasonable fees incurred by the Landowner would be paid by the Applicant as Acquiring Authority in line with the Fee Agreement between the parties.</p> <p>The Applicant has prepared heads of terms for a Land and Works Agreement to address the landowner's concerns and undertakes to expedite the matter.</p>

Issue number	Rep no.	Name	Relevant response	Response
			timely and comprehensive negotiations.	
LD17	RR-012	Lings Motor Group*	<p>Birketts LLP on behalf of Lings Motor Group. Summary objections to Lowestoft Third River Crossing DCO.</p> <p>Lings is a long established family owned car and motorcycle retailing business, and one of the main UK dealers for Honda, Hyundai, Mitsubishi Cars, Triumph and Husqvarna Motorcycles, and employs over 110 people at five branches across East Anglia. Ling's head office and major retail operations are located on a 6 acre site at Riverside Road, Lowestoft(the Site) where it directly employs 44 people.</p> <p>The order requires the permanent acquisition of the freehold of a substantial area of land within Ling's site, acquisition of rights over a further substantial part of the Site, and requires Lings' existing access from Riverside Road to be closed and replaced with a left turn only access / egress onto Waveney Drive.</p> <p>Whilst the Council have engaged with Lings they are yet to provide a solution which works both practically and financially. As currently proposed, the impacts of the scheme on Lings are expected to include the following:</p>	<p>The Applicant and landowner have a long history of collaborative engagement, with the Applicant supporting the appointment of a number of specialists to support Lings in its consideration of the impacts of, and mitigation for, the Scheme – including motor dealership and compulsory acquisition surveyors, architects and highway engineers. Those discussions are ongoing and continue to inform the Scheme design, temporary and permanent use of land and associated accommodation work to enable the landowner to remain on site.</p>
LD18	RR-012	Lings Motor	- the loss of substantial areas of external	The Applicant has quantified the maximum

Issue number	Rep no.	Name	Relevant response	Response
		Group*	<p>display (retail land) as a result of compulsory acquisition of land and rights over land within the Site;</p> <ul style="list-style-type: none"> <li>- revised site access will necessitate reconfiguration of Site-internal traffic circulation with knock on additional loss of display and storage land, loss of operational space to rear of workshop, prevent planned extension to workshop, and obstruct retail use of land to east and south east of main showroom building;</li> <li>- Loss of Enterprise Car rental operations, likely loss of franchise and of related cross-selling opportunities, reduction of car servicing/repair business;</li> <li>- Inadequate Site servicing arrangements, particularly for articulated car transporters;</li> <li>- Increased vehicle queuing at revised access both within Waveney Drive and within Site;</li> <li>- Significantly increased risk of accidents between pedestrians, cars, motorcycles and articulated car transporters accessing and servicing the Site;</li> <li>- Severe business disruption leading to significant harm to trading from the Site during construction and lasting harm to trade during operational phases.</li> </ul> <p>Unless Lings is able to relocate, the loss of</p>	<p>(noting the limits of deviation could see this reduced) permanent loss of land as 8.5% of the site area (For clarity, this excludes plots 3-58 and 5-37, as this comprises the land currently occupied by Enterprise, which is not sought to be acquired from Lings, but rather to provide additional operation space for Lings as the Statement of Reasons explains in Appendix A (document reference 4.1 / PINS document reference APP-007). The Applicant is of the view that this 8.5% loss is not so significant that the Site cannot continue to operate successfully as a motor dealership. For context and comparison, the Applicant notes the current access arrangements for the property.</p> <p>These are neither particularly related to the showroom frontages of the building nor are they direct. Existing customers access the site from Riverside Road entering what is actually quite a narrow access road leading to a small roundabout where they make a 90 degree right turn to lead round to the front of the building to park. On this basis the Applicant's proposed solution is actually less circuitous and more direct than the existing arrangements.</p> <p>A Stage 1 Road Safety Audit has been undertaken and included within the application</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>retail space, loss of franchises and disruption of operations of the main showroom / workshop building will significantly adversely impact on how the Site trades</p> <p>Lings expect to present evidence to support the following objections:</p>	<p>(document reference 7.5, appendix 8 / PINS document reference APP-131) which confirms that points raised during the safety audit relating to the Lings access have been addressed in the design. The proposed site access has also been modelled and performs satisfactorily even with an inflated number of movements to/from the site.</p> <p>To mitigate the limited loss of land to the Scheme, the Applicant is of the view that there are opportunities to improve the efficiency of the site layout, for example, the layout of the 'service road' to the north of the site does not integrate well with the rest of the site. The Applicant has provided some plans to suggest how this might be done, and included for appropriate traffic circulation within the site – accounting for the requirements of a car transporter. It is worth noting that is increasingly uncommon for motor dealerships to be able to rely on the ability to load/unload vehicles on the highway. The Applicant has also proposed the relocation of Enterprise to provide additional flexibility to Lings. The commercial consequences of this to Lings would be compensatable.</p> <p>The Applicant is receptive to further suggestions from Lings as to how the</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>operational effects might be further mitigated; the Applicant, for example, notes that the existing boundary is protected by a dwarf brick wall which acts to obscure the majority of the existing vehicle display whereby only roofs of cars are visible to passing traffic on Waveney Drive. Notwithstanding this existing deficiency, the Applicant is willing to discuss solutions to improve display profile on the site if it is practicable and cost effective to do so.</p> <p>Finally, in terms of operational impacts, the Applicant would note the Scheme, once operational, will result in a very substantial increase in the volume of traffic immediately passing the site which will enhance the roadside credentials of this location.</p> <p>With respect to construction effects, access to the site will be managed in accordance with the provisions of the CoCP and any road closures kept to a minimum. The Applicant has provided for additional land to be temporarily occupied by Lings during construction (as discussed above – plot 3-56). The Applicant is receptive to further suggestions from Lings of mitigation measures; noting it recognises that matters such as dust suppression will be particularly important in this case. The Applicant also notes that the Interim CoCP</p>

Issue number	Rep no.	Name	Relevant response	Response
				imposes a requirement on the Contractor to maintain access to Lings during the construction phase.
LD19	RR-012	Lings Motor Group*	- Certain plots and rights over land within the Site are not required to deliver the Scheme;	The Applicant has identified in the Book of Reference (document reference 4.3 / PINS document reference APP-009) and in the Statement of Reasons Appendix A (document reference 4.1 / PINS document reference APP-007) the extent of plots and rights that it believes are reasonably required to deliver the Scheme and mitigate for its effects as so far as can be reasonably foreseen at this time. The Applicant remains in discussion with Lings on this point to understand if there is a specific right or plot in question.
LD20	RR-012	Lings Motor Group*	- The proposed revised access arrangements to the Site are unsatisfactory in traffic terms, and safety issues have not been resolved;	As discussed above, the Applicant considers that the functionality and safety of the proposed new access point have been satisfactorily resolved.
LD21	RR-012	Lings Motor Group*	- The currently proposed servicing arrangements by articulated car transporters are operationally unsatisfactory and hazardous;	As discussed above, the Applicant considers that the functionality and safety of the proposed new access point have been satisfactorily resolved. Vehicular tracking for car transporters has been undertaken and provided to Lings to demonstrate the relevant manoeuvres can be completed.

Issue number	Rep no.	Name	Relevant response	Response
LD22	RR-012	Lings Motor Group*	<ul style="list-style-type: none"> <li>- The revised access arrangements will necessitate a significant reconfiguration of the site to accommodate adequate and safe site-internal vehicle circulation space. This will result in the further loss of external retail space and workshop space, and render parts of the main show room building unusable for present purposes;</li> <li>- The scheme will significantly harm the continued trading of the Site;</li> <li>- With the exception of a single site (in Council ownership), there are no relocation sites available.;</li> </ul>	<p>As set out above, the Applicant accepts that some reconfiguration to the external layout of the site will be required and has provided some initial plans to Lings for their consideration. The Applicant considers a revised site layout could address some current inefficiencies and release additional land to offset the loss incurred to the Scheme.</p> <p>For the aforementioned reasons the Applicant does not consider that Lings needs to be relocated.</p> <p>Nevertheless, the Applicant is continuing collaborative discussions with the landowner and its agents and considering all viable options available, with a view to ensuring and assisting the landowner in mitigating any and all losses that it might conceivably suffer as a result of the scheme.</p>
LD23	RR-012	Lings Motor Group*	<ul style="list-style-type: none"> <li>- The Scheme is unviable. The Council's compensation liability to Lings alone exceeds its total land acquisition budget as set out in its Business Case. As a result, the Scheme does not meet the two conditions in s. 122 of the Planning Act 2008 and should not be approved;</li> <li>- The current proposal set out by the Council in dealing with Lings are not the least intrusive</li> </ul>	<p>The Economics Report (document reference 7.3 / PINS document reference APP-106) confirms that that the adjusted BCR for the Scheme indicates it is a very high value for money scheme.</p> <p>Appropriate allowances based on the Applicant's assessment of the compensation liability for the Scheme have been made as is set out in the Funding Statement (document</p>



Issue number	Rep no.	Name	Relevant response	Response
			in terms of business impact and financial impact. The proposals are not an appropriate use of public funds.	<p>reference 4.2 / PINS document reference APP-008).</p> <p>The predicted land costs were reported to the Cabinet of the County Council in June 2018, and the commitment to underwriting these costs remains. Please refer to paragraphs 3.2.8 - 3.2.9 and Appendix C of the Funding Statement (document reference 4.2 / PINS document reference APP-008).</p> <p>The Applicant continues to discuss with Lings its assessment of its potential claim, though it should be noted (as stated above) that the Applicant is not of the view that this would be based on the costs of relocating Lings.</p>
LD24	RR-012	Lings Motor Group*	The arrangements to mitigate impacts on businesses such as Lings as set out in the Interim Code of Construction secured by Requirement 4 are inadequate. In particular, there is no requirement to consult with local business on the final Code of Construction Practice. Again, this will exacerbate adverse business impacts.	<p>The Applicant has been in discussions with Lings for a significant period of time and envisages that this engagement will continue throughout the construction period. The Applicant is working with Lings to understand their site specific concerns, for example relating to access, dust and these are matters that will be addressed through a Land and Works Agreement between the parties. It is not considered appropriate that the full Code of Construction Practice is approved by specific businesses.</p>

Issue number	Rep no.	Name	Relevant response	Response				
LD25	RR-012	Lings Motor Group*	<p>The Council has failed to carry out any proper traffic assessment of its proposed revised access and servicing arrangements, to properly assess the extent of lost retail space within the Site, and to properly assess the impact of the Scheme on Lings. As a result, it has failed to properly consult with Lings and failed to engage in meaningful negotiations.</p> <p>For the above reasons, Lings consider that the adverse impact on Ling's operations outweighs the public interest in favour of the Scheme and will urge the Secretary of State not to approve the Scheme.</p>	<p><b><u>Access arrangements</u></b></p> <p>The Lings Showroom access would operate as a 'left-in left-out' arrangement. Therefore the only conflict at the junction is between traffic leaving the showroom giving way to oncoming traffic on B1531 Waveney Drive.</p> <p>Advance Transport Research (ATR) were commissioned by WSP to undertaken an Automatic Traffic Count (ATC) at the Lings Showroom access between 3 – 13 July 2017. This showed an average of 31 arrivals and 13 departures in the AM Peak (8:00-9:00am) and 14 arrivals and 35 departures in the PM Peak (5:00-6:00pm).</p> <p>The mainline flow on B1531 Waveney Drive for 2037, with the Scheme, has been extracted from the SATURN model. The results expressed in terms of queues, delays and Reference Flow Capacity (RFC) for vehicles emerging from the Lings access are tabulated below.</p> <p><i>Table 6-2 vehicles emerging from Lings</i></p> <table><tr><th>2037 With Scheme</th><th>Queue (PCU)</th><th>Delay (Sec)</th><th>RFC</th></tr></table>	2037 With Scheme	Queue (PCU)	Delay (Sec)	RFC
2037 With Scheme	Queue (PCU)	Delay (Sec)	RFC					

Issue number	Rep no.	Name	Relevant response	Response															
				<b>AM Peak</b>	0.02	4.80	0.02												
				<b>PM Peak</b>	0.05	4.96	0.05												
				<p>This capacity assessment demonstrates that the junction would operate with no queuing in 2037 with the Scheme in place. This is because traffic coming out of Lings is required to give-way to one-way traffic, and the levels of traffic leaving Lings are low.</p> <p>A sensitivity test has also been undertaken to assess the impact of 500 vehicles leaving Lings in the peak hours. This demonstrated that even with a significant increase in the volume of vehicles from the site, the junction would continue to operate with queues of less than 3 PCUs.</p> <p><i>Table 6-3 2037 Sensitivity test</i></p> <table><tr><th>2037 With Scheme (sensitivity test)</th><th>Queue (PCU)</th><th>Delay (Sec)</th><th>RFC</th></tr><tr><td>AM Peak</td><td>2.49</td><td>16.71</td><td>0.72</td></tr><tr><td>PM Peak</td><td>2.49</td><td>16.74</td><td>0.72</td></tr></table>				2037 With Scheme (sensitivity test)	Queue (PCU)	Delay (Sec)	RFC	AM Peak	2.49	16.71	0.72	PM Peak	2.49	16.74	0.72
2037 With Scheme (sensitivity test)	Queue (PCU)	Delay (Sec)	RFC																
AM Peak	2.49	16.71	0.72																
PM Peak	2.49	16.74	0.72																

Issue number	Rep no.	Name	Relevant response	Response
				<p>The analysis has demonstrated that the proposed access is more than adequate for the existing levels of traffic accessing the showroom, as well as providing ample spare capacity for future growth.</p> <p><b>Engagement</b></p> <p>The Applicant rejects the suggestion there has been a lack of meaningful discussions with Lings; the Applicant has been actively engaged with Lings and its representatives throughout the course of the pre-application period and is fully aware of Lings' concerns.</p> <p>The application was discussed with the landowner during earlier concept stages and this collaboration between the applicant, landowner, motor-trade specialist agents and CPO advisors, architects and engineers supported and advised those discussions, with the feedback that was received from the landowner helping to inform the applicant's overall project design, temporary and permanent use of land and associated accommodation works that have been discussed and proposed to enable the landowner to remain on site.</p> <p>In light of Lings' concerns the Applicant has reviewed the proposed access to Lings and</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>identified that further refinements may be possible to his arrangement. This information has been provided to Lings for their consideration.</p> <p>The Applicant is aware of, and has quantified, the land take from Lings and identified means of reorganising the site to make more efficient use of the land to offset this loss, and is also working with Enterprise to identify an alternative site which would provide further space for Lings to mitigate the land take required for the Scheme. The Applicant has also supported Lings in their appointment of an architect to identify beneficial changes to site layout to further reduce the effects of the Scheme.</p>
LD26	RR-024	Brookhouse (Lowestoft) Nominees VI Ltd*	<p>Axis Properties Consultancy are representing Brookhouse (Lowestoft) Nominees VI Limited (the Owner) who own the North Quay Retail Park (the Property) which is a substantial development comprising 15 retail units totalling 17,373 sq m (187,000 sq ft) occupied by tenants such as Next, Halfords, Morrisons, Pets at Home, Poundland, Iceland, Costa Coffee, TK Maxx, Argos, Home Bargains and Barnados.</p> <p>The area of land proposed to be acquired for</p>	<p>Review of HMLR Title boundaries indicated that the registered title for the landowner encroaches onto the public highway, as such the Applicant is seeking to regularise this position through the inclusion of plots 1-02 and 1-03 in the Book of Reference. The Applicant is not seeking to acquire operational land from Brookhouse.</p> <p>The construction impacts will be managed in accordance with the Code of Construction practice which will provide for construction</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>the Lake Lothing Crossing (the Scheme) forms part of the main road frontage and sole customer vehicular access into the retail park and the loss of this land will therefore directly affect all of the aforementioned occupiers on the park. At present Suffolk County Council (the Council) has not adequately justified the requirement to take this land nor has it provided sufficient information to the Owner for it to assess the potential impact the acquisition of this land will have on its retained property.</p> <p>The Owner is a well-established property developer and investor specialising in the out of town retail sector and it is extremely concerned that the scheme as currently proposed will impact the current access into the Property and adversely affect the businesses on the retail park in particular during the construction period.</p>	<p>traffic management measures which will be appropriately advertised so as to minimise disruption in the general area during construction.</p> <p>The Applicant would note that by virtue of its location North Quay Retail Park is likely to be a significant beneficiary of the Scheme by much improved accessibility to the site, particularly from south Lowestoft. There will be no works taking place that will directly affect access to North Quay Retail Park.</p>
LD27	RR-024	Brookhouse (Lowestoft) Nominees VI Ltd*	The Owner has confirmed in writing its willingness to engage with the Council but despite several attempts to progress these discussions, both with the Council and its appointed property consultants Ardent Management, it has not received any detailed response to its letters and emails dated 24 July 2018, 16th August 2018 and 13th September 2018.	The Applicant's consultant, Ardent, has been unsuccessful in contacting the Agent for this site over the past few months, though matters are now progressing.

Issue number	Rep no.	Name	Relevant response	Response
			In accordance with the 'Guidance on the Compulsory Purchase Process' published by DCLG, the Council has not provided sufficient information to enable the Owner to assess the impact on its retained land nor has it made any meaningful attempt to acquire the property by agreement in advance of the CPO being obtained. Unless and until such engagement has taken place to the Owner's reasonable satisfaction this objection will be maintained.	
LD28	RR-017	Northumbrian Water Limited*	<p><u>Construction phasing</u></p> <ul style="list-style-type: none"> <li>• <b>Maintaining access to Trinity House and Canning Road</b> – although the proposed construction phases (as set out in Section 5 of the Environmental Statement) indicate that construction of the Waveney Drive junction and new access road to allow access to the Riverside Business Park will be the first phase, there is a lack of clarity as to how this will be secured, and that access to Riverside Business Park (and Trinity House) will be maintained at all times. In relation to the eastern end of Canning Road, the DCO (in Schedule 4) does not expressly acknowledge that this junction will cease to operate, nor the timing for when this would occur.</li> <li>• <b>Maintaining constant connectivity of services to Trinity House</b> – a lack of detail</li> </ul>	<p><b>Maintaining Access</b></p> <p>The Applicant intends to ensure appropriate steps are taken to manage any disruption caused during the construction of the Scheme, including the improvements to the related highway network. Paragraph 2.8.3 of the Interim Code of Construction Practice (document reference 6.3 Appendix 5A to the ES/ PINS document reference APP-163) requires the Contractor as part of the full Code of Construction Practice (CoCP) to set out the traffic management measures that will be applied during the course of the construction phase. This is secured by requirement 4 of the dDCO) which requires the CoCP to be approved before the commencement of the Scheme, for the CoCP to be in accordance with the Interim Code of Construction Practice and for the authorised development to be</p>

Issue number	Rep no.	Name	Relevant response	Response
			regarding the measures to be taken, and how these will be secured through the DCO to ensure that all services to Trinity House are maintained (and what measures would be taken to secure emergency connectivity should that prove necessary).	<p>carried out in accordance with the approved CoCP.</p> <p>The improvements proposed include the closure of the existing junction between Riverside Road and Canning Road and an alternative route to access Trinity House will be provided from Waveney Drive via the New Access Road (reference C as shown on sheet 2 of the Rights of Way and Access Plans document reference 2.5 / PINS reference APP-027), part of the existing Riverside Road to be improved and an unclassified road (reference D as shown on sheet 2 of the Rights of Way and Access Plans document reference 2.5/ PINS reference APP-027).</p> <p>Maintaining Services</p> <p>The Applicant is working with the utility suppliers with apparatus in the area that could be affected by the Scheme. The typical construction methodology for the diversion of utility services involves the construction of new/replacement apparatus before the disconnection of existing apparatus to ensure continuity of supply. Furthermore, the protective provisions for the relevant statutory undertakers provide sufficient protection for their apparatus. The security of supply for</p>



Issue number	Rep no.	Name	Relevant response	Response
				utility provision is a matter for the utility providers. The process is such that the Applicant orders the required works, and the planning and implementation of those works is beyond the Applicant's control.
LD29	RR-017	Northumbrian Water Limited*	<p><u>Interim Code of Construction Practice (CoCP)</u></p> <p>Insufficient detail to ensure that the final form CoCP will mitigate the effects of the construction activities on NWL's operations at Trinity House and the measures to be taken to ensure no disruption to connectivity of services to the building, or those aimed at minimizing the effects of noise and vibration.</p>	<p>Landowner engagement is ongoing with a view to fully understanding how the Scheme may impact day to day operations of all affected parties who remain in situ during the construction of the Scheme.</p> <p>The mitigation that has been proposed within the ES (document reference 6.1 / PINS document reference APP-136) and the Interim CoCP (Appendix 5A of the ES (document reference 6.3 / PINS document reference APP-163)) has been informed by a worst-case scenario with plant working at a single point at the centre of the closest working area to the receptor for 80% of the working day and this is unlikely to occur frequently.</p> <p>With regard to vibration, the assessment within the ES has identified negligible significance of effects at all receptors that have been assessed and no further measures are considered necessary.</p> <p>Notwithstanding that, the Applicant is receptive to considering further information or further</p>

Issue number	Rep no.	Name	Relevant response	Response
				measures that NWL may identify as necessary to safeguard the continuity of their operations. The parties are working collaboratively towards putting in place a Land and Work Agreement, that assists the landowner as far as possible in mitigating business disturbance (which the landowner has a duty to do under the Compensation Code).
LD30	RR-017	Northumbrian Water Limited*	Concerns over proposed core working hours and the criteria and management of proposed periods of extended hours.	<p>The Interim CoCP (Appendix 5A of the ES (document reference 6.3 / PINS document reference APP-163)) includes information on hours of work. It states that the core working hours for construction of the Scheme will be 07:00-19:00 on weekdays and 07:00-12:00 on Saturdays, with a one hour mobilisation and demobilisation period before and after the working day. Occasionally works may be required outside these hours and where this is the case this will be with advanced notice.</p> <p>Limited non-disruptive work such as office and preparatory work will take place either side of these hours at the site compounds.</p> <p>As stated in paragraph 2.3.3 of the CoCP where further works are required to be undertaken outside the core working hours this would be via agreement with WDC prior to works commencing. It is considered most</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>appropriate that the local planning authority considers such matters.</p> <p>The Applicant considers that such hours are reasonable and common place on such projects.</p>
LD31	RR-017	Northumbrian Water Limited*	Further details required in relation to the approach to reinstating habitat on the NWL land being used for construction purposes.	The Landscape Plans (document reference 2.8 / PINS document references APP-035 to APP-037) identify that this area is to be planted with low level planting for invertebrates. The details of this landscaping will be subject to detailed design and discussed with NWL through the development of the proposed Land and Works Agreement. However, the Applicant notes that NWL is ultimately protected by article 32(4) of the dDCO which states that before giving up temporary possession of land it must restore the land to the 'reasonable satisfaction of the owners of the land'.
LD32	RR-017	Northumbrian Water Limited*	Location and distances in relation to closest construction works to Trinity House	The ES (document reference 6.1 / PINS document reference APP-136, in paragraph 13.5.27 states that "the assessment is based on a worst-case scenario with plant working at a single point at the centre of the closest working area to the receptor for 80% of the working day." The closest location to Trinity House is approximately 70m away at Point G (see Figure 13.1, document reference 6.2 /

Issue number	Rep no.	Name	Relevant response	Response
				PINS document reference APP-152). With regard to Trinity House, construction works will be where the approach to the southern roundabout is located.
LD33	RR-015	Cara Robinson*	<p>Carter Jonas act on behalf of Cara Robinson and we write to register her as an Interested Party in the application for the Lake Lothing Third Crossing (Lowestoft) Development Consent Order (the 'Application').</p> <p>Ms Robinson is the owner of the freehold interest in Bellablue Beauty Salon, Waveney Drive, Lowestoft, NR33 0TN (Bellablue), which is identified in the Application for compulsory acquisition (Plot 5-22). Ms Robinson runs her business, Bellablue Nails and Beauty Limited from the Property.</p> <p>Ms Robinson lives with her family in their house immediately neighbouring Bellablue, [redacted] (freehold ownership). Living adjacent to her work place enables Ms Robinson a balance between earning her livelihood on flexible working hours and being present and available to support her family. We had understood that no part of Ms Robinson's house were included in the application boundary, however on review of the Book of Reference in the Application we note that 6</p>	The Applicant has clarified with the landowner's representatives their misinterpretation of the description of plot 5-33 (in that this does not form part of Cara Robinson's residential property, but rather the commercial property). The parties are continuing their collaborative engagement, with a view to putting in place an Option Agreement that assists the landowner as far as possible in mitigating business disturbance and finding a suitable replacement property.

Issue number	Rep no.	Name	Relevant response	Response
			<p>square meters are identified for compulsory purchase (plot reference 5-33).</p> <p>If the Applicant is granted compulsory purchase powers to acquire Bellablue, Ms Robinson will need to find a suitable replacement for the continuation of her business in the south of Lowestoft close to her existing client base. This in itself will be very challenging, however it is essential that Ms Robinson is also able to continue to work in close proximity to her home. If work and home are separated, it will cause significant disruption to family life. The Scheme therefore represents a significant risk to both Ms Robinson's livelihood and family life. We are in discussions with the Applicant to support her in finding a solution to enable her to continue her current work / family life arrangements and progress has been made to date. Significant further progress is however needed to confirm a solution which secures Ms Robinson and her family's future in the face of the risks posed by the Scheme and until such time she therefore objects to the Application.</p>	
LD34	RR-010	Mr R Cousin	Compensation available for local private residences for disruption and disturbance during the construction phase, especially the proposed 24-hour construction phase for	By virtue of section 10 of the Compulsory Purchase Act of 1965, where no land or interest in land is acquired from a claimant, compensation is payable in a case where the

Issue number	Rep no.	Name	Relevant response	Response
			several months.	<p>construction (rather than operation) of the public works interferes with the landowner's enjoyment or diminishes the value of their land, either permanently or temporarily.</p> <p>Compensation is assessed by reference to any diminution of value of the claimant's interest in land caused by the interference with their private right.</p>
LD35	RR-010	Mr R Cousin	Compensation available for potential damage to private dwellings incurred by construction.	<p>It is not envisaged that any such damage would be caused by the construction of the scheme outside of the Order limits.</p> <p>By virtue of section 10 of the Compulsory Purchase Act of 1965, where no land or interest in land is acquired from a claimant, compensation is payable in a case where the construction (rather than operation) of the public works interferes with the landowner's enjoyment or diminishes the value of their land, either permanently or temporarily.</p> <p>Compensation is assessed by reference to any diminution of value of the claimant's interest in land caused by the interference with their private right.</p>

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## 7 Maritime and Port Operations

### 7.1 Overview

- 7.1.1 Twelve interested parties raised issues on maritime and port operations. Table 7-1 provides the matters raised on this theme, alongside a response from the Applicant.
- 7.1.2 These issues are mostly already considered in the ES (document reference 6.1 / PINS document reference APP-136) and Preliminary Navigation Risk Assessment (NRA) (document reference 6.7 / PINS document reference APP-208).

## 7.2 Key issues

*Table 7-1: Matters raised on maritime and port operations*

Issue number	Rep no.	Name	Relevant response	Response
MP1	RR-022	ABP*	<p><u>Mitigation</u></p> <p>ABP has convened workshop meetings with the applicant at which it has raised the question, amongst others, of mitigation. If the applicant wishes to mitigate the serious detriment that its scheme will cause, as it is the applicant who is proposing to introduce a hazard, namely the LLTC, into the Port – it is for the applicant to promote the necessary mitigation which must encompass a series of measures, including the loss to compulsory acquisition of operational berth space and the provision of an emergency berth, without which the Port may be faced with in perpetuity with safety issues which go to ABP's long-term ability to operate the Inner Harbour.</p>	<p>Section 15.5 of the ES (Document reference 6.1 / PINS document reference APP-136) assessed the impact of the Scheme on port operations during both the construction and operational phase on the basis of the information available.</p> <p>The Applicant remains willing to provide mitigation to ABP on a reasonable and proportionate basis based on robust evidence of necessity and is willing to collaborate with ABP in identifying what mitigation may be necessary in this context.</p> <p>As ABP notes in its Relevant Representation, it has recently engaged with the Applicant to outline a package of mitigation measures which ABP has recently stated it considers are necessary to mitigate the impacts of the Scheme on the port estate.</p> <p>The Applicant's position is that any detriment arising or forecast to arise will need to be subject to analysis to ensure that any mitigation designed to address it does in fact relate to, and address, the actual detrimental impacts of the Scheme (as distinct from</p>



Issue number	Rep no.	Name	Relevant response	Response
				<p>facilitating ABP's wider or more long-term commercial aspirations).</p> <p>The Applicant would like to agree mitigation matters with ABP as early as possible during the Examination, to enable the Examining Authority to present a settled position in its Report of Recommendation to the Secretary of State at the close of the Examination.</p> <p>The impact of the Scheme on the Port, and therefore the necessity for further mitigation measures remains under discussion with ABP.</p>
MP2	RR-026 RR-027 RR-029 RR-031 RR-032 RR-036 RR-037	Hitech Grand Prix Limited*  Lift Truck Rentals Limited*  Nexen Lift Trucks Limited*  Oakes Recruitment Limited*  Overseas	Our clients also note that the land identified as Plot 3-52 on the Land Plan Sheet 3 of 155 (1069948-WSP-LSI-LL-DR-GI-0004) and Work No. 7 on the Works Plan Sheet 2 of 2 (1069948-WSP-LSI-LL-DR-CH-0003) is identified in the draft development consent order for the construction of a new mooring within Lowestoft Harbour. Our clients' have previously leased moorings adjacent to the Land and are concerned that this will not be practically possible during and following the construction of this new mooring. Furthermore, our clients have reservations about the ability to access their Land from Lake Lothing during and following the construction of this mooring. Our clients also have concerns relating to the	<p>Inspection of the bathymetry (underwater depth of lake) indicates that the bed of the lake in front of the Nexen site is silted to such an extent that it dries at low water therefore the ability to use it as a marine facility is severely restricted. Consultation with ABP as the Statutory Harbour Authority confirmed that this area has not been dredged for more than 10 years.</p> <p>The extinguishing of navigation rights is limited to areas where the presence of the bridge structures would make navigation impracticable. These powers will not remove the right to navigate over the full length of the lake nor limit a vessel's ability to navigate</p>

Issue number	Rep no.	Name	Relevant response	Response
		Interests Inc*  Team Oakes Limited*  Waveney Fork Trucks Limited*	powers set out in the draft DCO for the extinguishment of various rights of navigation within Lake Lothing.	safely within the vicinity of the bridge.
MP3	RR-006	SMS Group	As general manager for SMS Group Lowestoft Shipyard. I would like to attend to determine the effect that this will have on our business, to give feedback to SMS parent group head office.	SMS Group Lowestoft Shipyard operate from the dry dock is east of the bridge location and outside the scheme Order limits, as such the Scheme has no direct effect on their business.  The Applicant has contacted SMS Group, and provided answers to a number of points of clarification that SMS sought.
MP4	RR-010	Mr R Cousin	What is the daily amount of bridge raising proposed by the port authority and its timing.	The number of daily bridge lifts will vary depending on shipping requirements, but the Scheme proposal included within the dDCO is that no opening will occur in AM and PM peak times.  An assessment of the potential number of bridge operations that may be required is given on page 5 of appendix B of the Preliminary Navigational Risk Assessment (NRA) (document reference 6.7 / PINS document reference APP-208).

Issue number	Rep no.	Name	Relevant response	Response
				A Scheme of Operation will be developed in collaboration with key stakeholders and will set out the basis on which bridge openings will occur. A draft is proposed to be submitted to Deadline 3.
MP5	RR-016  RR-035	Lowestoft Cruising Club  Royal Yachting Association	Welcome the setting up by Suffolk County Council (SCC) of the Navigation Working Group (NWG), which Lowestoft Cruising Club (LCC) attended and contributed. The minutes of the NWG meetings (APP-090) form an important discussion of the navigation issues for recreational vessels. We agree with the overall conclusions and expect them to be implemented, and welcome a later meeting for a discussion with contractors regarding risks and mitigation measures during the construction process.	<p>The Navigation Working Group (NWG) was set up to enable discussion between the Applicant, ABP and representatives of key maritime businesses and organisations representing boating and recreational interests.</p> <p>The working group aims to facilitate:</p> <ul style="list-style-type: none"> <li>the exchange of information in regard to the navigational and associated socio-economic impacts of the Lake Lothing Third Crossing</li> <li>the exploration of opportunities to minimise those impacts</li> <li>the exploration of opportunities to maximise benefits</li> </ul> <p>Two meetings have taken place so far, with a further one planned in December 2018.</p> <p>Implementation of all recommendations from the NWG has fed into the Preliminary Navigation Risk Assessment (NRA) (document reference 6.7 / PINS document reference APP-208).</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>Further development of the NRA, in conjunction with the NWG, will be undertaken with the Contractor during the design development and construction phases, as required by the pNRA.</p> <p>Reports of the previous meetings can be found in Appendix 37 of the Consultation Report (document reference 5.2/ PINS document reference APP-090)</p>
MP6	RR-016  RR-035	Lowestoft Cruising Club  Royal Yachting Association	We fully support the provision of a waiting pontoon off Nexen (APP-015, 040 & 041, APP-136, APP-198, APP-205, page 20, parag. 5 & 6).	Thank you for your comments. A pontoon has been included in the Scheme for use by recreational vessels, located to the east of the new highway crossing, within the Inner Harbour of Lake Lothing. The pontoon was added to the Scheme in response to feedback from the Navigation Working Group during preparation of the Preliminary NRA (document reference 6.7 / PINS document reference APP-208).
MP7	RR-016  RR-035	Lowestoft Cruising Club  Royal Yachting Association	While the Vessel Simulation Report (APP-198) only modelled larger commercial vessel movements, the LCC conclude that the navigation risks to recreational vessels when the bridge is operational are only marginally increased. However, the navigation risks are significantly increased during the construction	<p>The Applicant agrees with these comments. All mitigation measures identified within the NRA are to be included within the Scheme, as secured through a Requirement of the DCO.</p> <p>Further refinement of the NRA will be undertaken in conjunction with the appointed</p>

Issue number	Rep no.	Name	Relevant response	Response
			phase, and all recommended mitigation measures should be undertaken, along with those defined in APP-208 Navigation Risk Assessment. See also APP-136, page331.	Contractor and the NWG to ensure construction risks are adequately covered.  The Applicant is reviewing the drafting of the DCO as it relates to the NRA to ensure that it allows the document to be appropriately updated at relevant stages.
MP8	RR-016  RR-035	Lowestoft Cruising Club  Royal Yachting Association	1. There is no clear commitment in the documentation (e.g. APP-136, page 330, parag. 15.5.18-21; Table 16-9) to maintain the existing navigation rights with at a minimum, openings of the new bridge to match the existing 24/7 opening schedule of the A47 bascule bridge, as given in ABP "Lowestoft Small Craft & Yacht Notice", dated 7 November 2011. While most motor yachts will not require the new bridge to open, many larger yachts will require the new bridge to open and integrate with the A47 bascule bridge openings. The opening schedule for the new bridge should only be decided with the full involvement of the maritime community west of the bridge.	A Scheme of Operation will be developed in collaboration with key stakeholders and will set out the basis on which bridge openings will occur. The dDCO sets out that no opening will occur in AM and PM peak times, as such it will be different from ABP's 2011 Notice.  The effects on recreational vessels arising from the Bridge being in place are set out in chapter 16 of the ES (document reference 6.1 / PINS document reference APP-136).
MP9	RR-016  RR-035	Lowestoft Cruising Club  Royal Yachting Association	The summer closure of the western part of Lake Lothing to vessels for three weeks during the positioning of the bridge is unacceptable.  APP-136, page 58, parag. 5.6.20 states [to quote] "For the purposes of the assessment it has been assumed that this possession [of	Figures from the vessel survey indicate that a peak of 391 recreational vessels passed the bridge location during any three-week (21 days) period between August and September 2017. The Vessel Survey Report is included as Appendix B to the Preliminary NRA (document reference 6.7 / PINS document reference APP-

Issue number	Rep no.	Name	Relevant response	Response
			<p>navigation channel] will take place for three consecutive weeks during the summer months when recreational vessel movements in Lake Lothing are likely to be highest".</p> <p>See APP-136, pages 328/9, parag. 15.5.9, Table 16-9 and page 356; parag. 16.7.1. We disagree with the quote that "the majority of vessels do not navigate to the west of the scheme". The western end of Lake Lothing has four marinas, additional moorings, and also vessels traverse to and from the Mutford Lock. From the Vessel Survey Report (APP-208) one can deduce that closure of the navigation channel for three weeks in the summer would stop at least 400 vessel movements and create a moderate adverse impact (Table 15-2), not the "slight impact" given in paragraph 15.5.9 or the "minor adverse and not significant" impact quoted in Table 16-9 and page 356, parag. 16.7.1.</p> <p>We cannot agree that (to quote) "During this time [three weeks], no recreational vessel will be able to navigate through Lake Lothing to or from the North Sea but this does not constitute a significant effect due to the duration of the closure." (APP-205, page 20, parag. 3).</p> <p>A three week closure in the sailing season would influence a much longer period as</p>	<p>208).</p> <p>Notice to Mariners and publication of proposed dates for closures would be undertaken significantly in advance of the works being carried out, thereby allowing alternative arrangements to be made.</p> <p>The closure has been informed from constructability advice and has been assessed as likely being for a three-week period. The duration and timings of actual closures have not been confirmed at this stage, these will be developed by the contractor.</p> <p>The Applicant is currently considering the feasibility of alternative berthing during the period of closure, having regard to the availability of alternative berths to the east of the Scheme and the challenges/constraints of temporarily installing others.</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>vessels cruising before the closure would be unable to return to their moorings, and vessels planning to leave in e.g. school holidays for an extended cruise could well miss their cruising opportunity for the whole season.</p> <p>A three week closure might be acceptable if it takes place between November and March, the quietest part of the sailing season.</p>	
MP10	RR-035	Royal Yachting Association	<p>However, should the application be granted we would hope that Suffolk County Council could liaise with the Cruising Club and other local stakeholders such as ABP and other local sailing clubs for alternative moorings to be made available during the three-week closure period which would allow Cruising Club members to continue sailing.</p>	<p>The Applicant is currently considering the feasibility of this request, having regard to the availability of alternative berths to the east of the Scheme and the challenges/constraints of temporarily installing others.</p>

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## 8 Highways and transportation

### 8.1 Overview

- 8.1.1 Nine interested parties raised issues on the highways and transportation for the Scheme. Table 8-1 provides a summary of the matters raised on the traffic modelling theme, alongside a response from the Applicant.
- 8.1.2 The issues relating to traffic modelling are mainly already considered in the Transport Assessment or the data which informed it (document reference 7.2 / PINS document reference APP-093). The issues regarding the highways design are considered in the DR (document reference 7.5 / PINS document reference APP-123 and DGM (document reference 7.6 / PINS document reference APP-133) and shown in the design presented in the Engineering Section Drawings, Plans and Elevations (document reference 2.9 / PINS document reference APP-038 to App-051).
- 8.1.3 As noted in the Errata Report (SCC/LLTC/EX/4) an update to the Transport Assessment will be provided to Deadline 3.



*Table 8-1: Matters raised on highways and transportation issues*

Issue number	Rep no.	Name	Relevant response	Response
HT1	RR-020	WDC and SCC*	<p>1) Highways</p> <p>a) Several minor traffic modelling issues have been identified that need to be addressed prior to granting the DCO. While these issues are not considered to significantly affect overall impact of the scheme they may influence capacity or delays at individual roads and junctions. Officers will work with the applicant to resolve these prior to and during the examination.</p> <p>b) Further detailed resolution is required on road safety issues at a small number of junctions. These are capable of resolution during the course of the Examination.</p> <p>c) Attention is drawn to the inflexibility of the DCO process to allow changes to agreed plans after consent is issued. This would make later alterations to such items as parking restrictions difficult although it is accepted that the applicant has undertaken consultation with stakeholders and that revisions can be made during the examination which reduces this risk. Officers will work with the applicant to ensure details are as accurate as possible before the conclusion of the Examination.</p>	<p>a) and b) Further discussions with SCC as the highway authority has reduced the outstanding points to a few minor junction modelling points. The Applicant is confident these will be resolved and will be addressed as relevant in the update to the Transport Assessment to be submitted to Deadline 3. Please refer to the SoCG between the parties for more detail.</p> <p>c) The Applicant notes and shares the concerns of SCC and WDC that making changes to development consent orders, once made, is not a process to be undertaken lightly and the Applicant has taken care in preparing its traffic regulation measures. However, in respect of the specific concern relating to traffic regulation measure the Applicant observes that article 52 (traffic regulation measures) of the DCO (document reference 3.1/ PINS document reference APP-005) clarifies that the traffic regulation measures could be subsequently varied or amended without the need to amend the DCO.</p> <p>This matter has been agreed in the SoCG.</p>

Issue number	Rep no.	Name	Relevant response	Response
			d) The impact of construction traffic will require further consideration as additional information becomes available and this will need to be dealt with within the final version of the Code of Construction Practise.	
HT2	RR-034	Royal Mail Group Ltd*	<p>Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.</p> <p>Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.</p> <p>Royal Mail's nearest operational property is Lowestoft Delivery Office, Barnards Way, Lowestoft NR32 2ER, situated approximately 250 metres from the nearest part of the proposal site boundary on Peto Way.</p> <p>Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads</p>	<p>The Scheme would provide an alternative to the existing crossings that would result in a significant improvement in traffic conditions on a number of key routes. There would be significant reductions in traffic on the existing A47 Bascule Bridge, which is a bottleneck. The Scheme would also reduce traffic levels on the A47 as it passes through the town centre and the northern part of the town and on the A1117 through Mutford Lock and along Normanston Drive. The Scheme would also deliver significant benefits in terms of reducing congestion and delay on the local road network and will alleviate serious bottlenecks on the main road network. This would be particularly significant during times of lifting of the A47 Bascule Bridge where the Scheme would provide an alternative route.</p> <p>It should be noted that on the northern side of the Scheme, most of the construction would take place off-line so delays will be limited to tie-in works to the existing network. While there</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>that may potentially be affected by additional traffic arising from the construction of the proposed Lake Lothing Third Crossing. In particular, Peto Way and Tom Crisp Way are major routes for operational vehicles from Lowestoft Delivery Office.</p> <p>Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may be adversely affected by the construction and operation of this proposed scheme.</p>	<p>is likely to be some additional traffic during the construction period, once operational, the flow changes on Barnards Way as a result of the Scheme are predicted to be no more than 5%</p> <p>However, the reduction in delays and improved journey times across the wider network resulting from the Scheme, would be of particular benefit to Royal Mail's operations.</p> <p>Given the location of its Delivery Office on Barnards Way, the Scheme would afford significant savings in journey times to destination to the south of Lake Lothing by providing an alternative to A47 Bascule Bridge. The Scheme would therefore greatly assist Royal Mail in providing an efficient mail collection, sorting and delivery service.</p>
HT3	RR-034	Royal Mail Group Ltd*	<p>Royal Mail requests that:</p> <ol style="list-style-type: none"> <li>1. Royal Mail is pre-consulted by Suffolk County Council or its contractors on any proposed road closures/ diversions/ alternative access arrangements, hours of working and the content of the final Construction Traffic Management Plan (CTMP).</li> <li>2. The final CTMP includes provision for a mechanism to inform major road users about works affecting the local network (with</li> </ol>	<p>The final CoCP will include any traffic mitigation measures and is to be approved by the County Planning Authority.</p> <p>Traffic management measures required as part of the Scheme during construction will be advertised in a similar manner to all other highways works being undertaken by SCC as the highway authority. Consequently, all planned roadworks, road closures and diversions will be shown on</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>particular regard to Royal Mail's distribution facilities in the vicinity of the DCO application site).</p> <p>Royal Mail may simply rely on this statement but reserves the right to make further representations to the Examination in due course once further information is available.</p>	<p><a href="https://suffolk.roadworks.org/">https://suffolk.roadworks.org/</a> - and interested parties are able to set up personalised alerts accordingly.</p>
HT4	RR-017	Northumbrian Water Limited*	<p><u>Traffic and Transport operations</u></p> <p><b>Waveney Drive increase in traffic</b> – the technical assessment work concludes that there will be a doubling of traffic on Waveney Drive due to the Scheme, and as a result, will experience a substantial disbenefit with significant adverse effects on fear and intimidation and severance for pedestrians. No mitigation has been recommended as a result of the conclusion. Further mitigation measures to address this significant adverse effect to pedestrians should be considered.</p>	<p>The forecast traffic flows show that traffic levels will increase significantly on Waveney Drive as this provides the principal access to the Scheme.</p> <p>The predicted flows for the sections of Waveney Drive between Victoria Drive in the west and A12 in the east and are presented in Tables A-1, A-2 and A-3 in Appendix A.</p> <p>While flows are predicted to increase on Waveney Drive, this is offset by the significant reduction in traffic on the existing routes to both existing crossings and a reduction in journey times on the key route corridors through the town, during all time periods and this will have benefits for reducing severance for pedestrian and cycle journeys.</p> <p>The Applicant also notes that both the General Arrangement drawings and the Design</p>

Issue number	Rep no.	Name	Relevant response	Response
				Guidance Manual provide for a formal crossing of Waveney Drive to be provided just west of the new Southern Roundabout as mitigation for severance. These documents are secured through dDCO Requirement 3. There will therefore not be severance for pedestrians.
HT5	RR-017	Northumbrian Water Limited*	<b>Waveney Drive link capacity</b> - although junction capacity assessments have been undertaken in relation to junctions on Waveney Drive, no assessment has been made regarding the link capacity of Waveney Drive and Victoria Road to determine whether the existing road corridor can accommodate this forecast increase in traffic as a result of the Scheme. A link capacity assessment should be undertaken.	<p>Junction capacity assessments have been undertaken for key junctions along Waveney Drive and are reported within the Transport Assessment.</p> <p>In urban environments where links are typically shorter in length, junction capacity is the key constraint on traffic, rather than link capacity. The strategic model used for the scheme forecasts utilises link based speed / flow capacity constraints for links which are greater than 1km in length. This is consistent with DfT WebTAG guidance and the methodology which has been undertaken for the Highways England Regional Traffic Models.</p> <p>Figure B-1 in Appendix B shows the length of links in metres focusing on Waveney Drive and Victoria Road. This shows all links in the model are below 1km, and therefore junction capacity is deemed to be the main constraint on capacity for these links. It is therefore considered that assessing capacity along</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>Victoria Road and Waveney Drive through the junction assessments is the correct approach.</p> <p>The assessment of volume capacity ratios for the junctions along Victoria Road and Waveney Drive as presented in Section 9.3 of the TA (document reference 7.2 / PINS document reference APP-093) demonstrated that Victoria Road and Waveney Drive would operate within capacity in the 2037 forecast year.</p> <p>Design Manual for Roads and Bridges (DMRB), Volume 5, Part 3, TA 79/99 provides detail on the traffic capacity of urban roads. Waveney Drive is deemed to be an “Urban All-purpose road type 3” (UAP3) shown in Table 1 of TA 79/99. Table 2 of TA 79/99 states that for a UAP3, two-lane carriageway with a 7.3m width, the busiest direction flow should not exceed 1,300 vehicles in one direction. The strategic modelling shows on Waveney Drive to the west of the central crossing the busiest direction flow reaches around 940 pcus in the AM peak hour, and 1,080 pcus in the PM peak hour, therefore the increase in traffic flow projected along Waveney Drive is within the design standard guidance outlined in DMRB.</p>
HT6	RR-017	Northumbrian	<b>New Access Road / Waveney Drive Priority</b>	The strategic modelling has assumed 1,440

Issue number	Rep no.	Name	Relevant response	Response
		Water Limited*	<p><b>Ghost Island Junction</b> – the junction capacity assessments for the future year of 2037 only appear to include existing Riverside Business Park traffic level quantum. The assessment does not include likely future forecast traffic flows on the New Access Road associated with the Kirkley Waterfront and Sustainable Urban Neighbourhood (Policy WLP2.4 of the Waveney Local Plan Final Draft Plan March 2018), and future additional development at the existing Riverside Business Park. As a result, the proposed priority ghost island junction may not be appropriate to accommodate the future demand in this area (i.e. not future-proofed for the allocation). It is recommended that the future capacity and proposed junction form/layout should be reconsidered, and should be capable of accommodating the expected and future traffic flow without excessive delay to traffic on the New Access Road (this is also raised in the Stage 1 Road Safety Audit report Problem 1 and Designers' Response). This should be considered from the outset since it could affect the proposed road alignment of the New Access Road and the form of the junction which will be fixed as part of the DCO.</p>	<p> dwellings at Kirkley Waterfront by 2037, 730 dwellings by 2022. Appendix C details the assumptions in terms of the model zones which the 1,440 dwellings have been allocated zones in the strategic model and their relative zone loading location.</p> <p>The 730 dwellings in 2022 have been proportionally split between the accesses in the same way as the 1,440 dwellings in 2037. Therefore, the majority of trips associated with the development load onto the western end of Waveney Drive or Victoria Road. There is a residual of 157 dwellings which were modelled as using the access between Waveney Crescent and Kimberley Road (Zone 589) to account for the extent of the Kirkley Waterfront masterplan area.</p> <p>The traffic using the New Access Road is based upon TEMPRO growth for car trips and NTM growth applied to the LGV / HGV trips, therefore this does take some account of future traffic growth at Riverside Business Park since TEMPRO is based on projected traffic growth across Waveney District.</p> <p>In terms of the traffic demand to/from Riverside Business Park. This is combined along with traffic to/from Lings car showroom in the 2016</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>base year and Do Minimum (without scheme model runs). With the Scheme in place, this traffic demand is then split between two zones:</p> <p>Zone 910 representing Riverside Business Park traffic which uses the New Access Road</p> <p>Zone 773 representing Lings car showroom which has a left in / left out access between the Scheme and A12 Tom Crisp Way roundabout</p> <p>Table D-2 in Appendix D summarises the split of traffic demand between Lings and Riverside Business Park in the 2022 and 2037 Do Something (With Scheme) model runs.</p> <p>The Applicant notes that SCC/WDC has agreed in its SoCG that the design of the New Access Road “is appropriate having regard to the nature and scale of development that it is envisaged to serve”</p> <p>Notwithstanding that the Applicant remains of the view that the New Access Road adequately fulfils its principle function (that being to reprovide appropriate access to Riverside Business Park) the Applicant is undertaking a sensitivity test to assess the capacity of the proposed junction of the New Access Road</p>



Issue number	Rep no.	Name	Relevant response	Response
				and Waveney Drive, with updated assumptions regarding development in this area having regard to the progression of developments in the locality.
HT7	RR-017	Northumbrian Water Limited*	<b>Rail level crossing on B1531 Victoria Road</b> – there is minimal information detailed on the likely forecast impact on the existing rail level crossing as a result of the Scheme, particularly since there is forecast to be almost a doubling of traffic on Victoria Way and Waveney Drive. It is not clear what level of consultation has taken place with Network Rail and the local highway authority in terms of considering the safety implications of this forecast impact, since level crossings are considered by the Rail industry as a key safety concern in some instances, and Network Rail's policy position on level crossings is broadly to close, bridge over or tunnel under level crossings to address this safety concern.	<p>The forecast changes in traffic flows on B1531 Victoria Road in the vicinity of the level crossing near to A146 Bridge Road / A1117 Saltwater Way for 2022 and 2037 are presented in Table D-1 of Appendix D based on the Saturn Model.</p> <p>This shows that traffic flows passing through the level crossing will reduce substantially by approximately 50% as a result of the Scheme. Therefore the Scheme would help to alleviate delay and congestion which occurs at this level crossing.</p> <p>Table E-2 of Appendix E compares the forecast daily traffic flows for 2022 and 2037 with and without the Scheme on A146 Bridge road level crossing. This shows that traffic flows passing through the level crossing would reduce significantly by between 25 and 30%.</p> <p>The Scheme would therefore result in a significant reduction in traffic volumes at both level crossings.</p>
HT8	RR-017	Northumbrian	<b>New Access Road / New Canning Road</b>	There is sufficient room to provide a ghost

Issue number	Rep no.	Name	Relevant response	Response
		Water Limited*	<b>Priority Junction</b> – the proposed layout requires further review in the interests of highway safety. There is no proposed right turn lane facility into Canning Road (the vast majority of vehicles will turn right).	island junction but it is not deemed necessary. TD42/95 Geometric Design of Major/Minor Priority Junctions part of the Design Manual for Roads and Bridges, provides guidance that the provision of such a facility is based on a combination of traffic flows, see Figure 2.2 of TD 42/95. For the flows expected to be using Riverside Road, the link to Canning Road would need to become the Major Road Flow and the link to Nexen the Minor Flow. The figure states that for a major road flow the forecast traffic would need to be 13,000 vehicles two-way AADT and the minor road greater than 300 vehicles two-way AADT. The predicted flows based on the available car parking spaces to Waveney District Council offices, Northumbrian Water Ltd and others do not aggregate to 13,000 vehicles and similarly the number of vehicles accessing Nexen will be considerably less than 300 vehicles. Therefore, the predicted flows show that a simple junction without a right turn lane is appropriate.
HT9	RR-017	Northumbrian Water Limited*	The junction visibility splays should be shown, particularly to the right to vehicles exiting from the direction of Nexen, in order to demonstrate that the appropriate level of visibility can be achieved.	Visibility splays have been checked and provided to the junction. The proposed visibility envelope is shown in a plan in Appendix F and as per Suffolk County Council's design guide for a local distributor road, with a set-back of 4.5m.

Issue number	Rep no.	Name	Relevant response	Response
				<p>There is a small element outside of the Order limits, however any development on that land (which is in any event in local authority ownership) would be subject to the planning process in which impact on highways safety would be a consideration.</p> <p>Given that SCC as local highway authority will be required to sign off on completion of new highways pursuant to article 8 of the dDCO, the final placement of trees and visibility will be in accordance with highways standards.</p>
HT10	RR-017	Northumbrian Water Limited*	<b>New Access Road 90 degree bend</b> – in the interests of highway safety, the forward visibility should be shown on the General Arrangement Plan, and land set aside to accommodate the visibility envelope. We note that the Landscaping Plans (Sheet 2 of 2) shows proposed trees immediately either side of the new access road which could impede forward visibility. Further details should be given as to how the proposed land take for the Order Limits will be disposed of so as to maintain the required forward visibility around the bend within the future highway boundary.	<p>The land take proposals for the Scheme have taken account of the need for a visibility splay at this location - plots 3-41 and 4-04 are included for this purpose. This will provide for a 70m forward visibility, in accordance with Suffolk County Council's design guide for a local distributor road.</p> <p>Given that SCC as local highway authority will be required to sign off on completion of new highways pursuant to article 8 of the dDCO, the final placement of trees and visibility will be in accordance with highways standards.</p>
HT11	RR-017	Northumbrian Water	<b>Canning Road junction with Riverside Road</b> – Canning Road to Riverside Road is to be	No turning head was indicated in the application plans because it is anticipated that

Issue number	Rep no.	Name	Relevant response	Response
		Limited*	stopped up, but no turning head has been provided at the end.	<p>anyone using the remaining length of Canning Road is likely to be visiting the Registry Office and if any non-visitors to the office are forthcoming then they can turn around using the existing access to the Registry Office.</p> <p>However, the Applicant can confirm that it is currently reviewing whether a turning head should be provided and will update the Examination in due course.</p>
HT12	RR-017	Northumbrian Water Limited*	Furthermore, existing pedestrian/cycle accessibility to Canning Road is to be severed to Riverside Road. It is not clear how this accessibility will be maintained for existing staff at the Riverside Business Park.	<p>There are a number of options available to pedestrians and cyclists to access Riverside Business Park. There is currently an informal access between Riverside Road and the NWES car park. The Applicant will seek to retain this link. NWL has a suitable access on to Waveney Drive opposite its main entrance that will remain unchanged. There is also another access further to the west, adjacent to the Riverside Children and Families' Centre. The New Access Road also provides facilities for pedestrians and cyclists, and finally the Control Tower building is being future-proofed to allow for a link between the Bridge deck and Riverside Road to be created once public access to the adjacent quay has been provided by the landowner, Waveney District Council.</p>
HT13	RR-017	Northumbrian	<b>Pedestrian crossings</b> – there are proposed	The Applicant recognises the importance of

Issue number	Rep no.	Name	Relevant response	Response
		Water Limited*	new crossings on Waveney Drive and Riverside Road on the entry/exits to the new southern roundabout. Given the forecast doubling of traffic on Waveney Drive as a result of the Scheme, and the Environmental Statement conclusion that Waveney Drive will have a substantial disbenefit with significant adverse effects on fear and intimidation and severance for pedestrians, these proposed new crossings should be controlled crossings for both pedestrians and cyclists in order to maintain/enhance accessibility by non-motorised users to the Riverside Business Park.	<p>crossings to mitigate impacts on severance, however considers that the type of crossing is best determined through the detailed design process to ensure the most appropriate solution is used.</p> <p>The Applicant notes that SCC/WDC has agreed “that the type of control used at crossings should be determined at the detailed design stage taking account of the requirements set out in the Design Guidance Manual.”</p>
HT14	RR-017	Northumbrian Water Limited*	<p><u>Car Parking</u></p> <p><b>Reduction in on street car parking</b> – despite the application documents stating that demand for car parking at Riverside Business Park is greater than supply (causing daily overspill use of on street parking on Riverside Road and Canning Road) the proposals include further parking restrictions on Canning Road and Riverside Road which result in a net loss of on street parking of around 48 vehicles. We do not consider the assertion that the proposals will encourage a reduction in parking need through improved connectivity for pedestrians and cyclists to be justified and have concerns that the Transport Assessment states that any</p>	<p>The Applicant recognises the concerns of overspill of parking to adjacent residential areas.</p> <p>The Applicant, having conducted parking surveys, understands that there are a number of factors contributing to on-street parking in the area, in particular differing approaches to charging for staff at some shared premises.</p> <p>In some cases on-street parking is used out of ease of accessibility (for example proximity to workplace, avoidance of barrier controlled parking) than out of necessity – even when that work place has its own off-street parking.</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>displacement of on street parking would occur in the neighbouring residential streets (which we would consider inappropriate and insufficient).</p> <p><b>Canning Road restrictions</b> - it is not clear from the application documents why it is proposed to restrict all existing on street parking on Canning Road, since this on street parking should not affect the operation of the Scheme. NWL would argue this should remain as existing.</p> <p><b>Lack of parking on new access road</b> – there is no justification as to why on street parking could not be provided on the new access road, which would mitigate the loss of on street parking proposed elsewhere.</p>	<p>In the Applicant's view there is a reasonable prospect of some of the displaced parking being accommodated within existing sites, taking in to account the distance to adjacent residential areas.</p> <p>The Applicant also remains of the view that the Scheme will encourage cycling and walking and improves accessibility to Riverside Business Park for those modes.</p> <p>Consequently, the Applicant considers that while there remains some potential for displacement to adjacent areas, this would be limited.</p> <p>Nevertheless, the Applicant is reviewing the TRM plans to determine if some on-street parking could be retained. The Applicant does not however consider that on-street parking should be provided on the New Access Road; this is a 'Major Access Road' and in accordance with the Suffolk Design Guide this would be inappropriate.</p> <p>The Applicant is aware that NWL staff do use on-street parking, and is cognisant that SCC, as the local highway authority, is working with NWL regarding its Travel Plan.</p>

Issue number	Rep no.	Name	Relevant response	Response
HT15	RR-017	Northumbrian Water Limited*	<p><u>Traffic and transport – During construction</u></p> <p><b>HGV impact</b> – the ES forecasts 108 two-way HGVs per day to the southern compound, which enter via Waveney Drive, but then states that this “does not require detailed assessment as it will not constitute a change in traffic of greater than 30% on any link within the study area”, however the number of HGVs will increase by more than 30% on Waveney Drive, as a result (&gt;85%). Reassessment should be undertaken to determine if there are likely to be any significant effects arising, and associated mitigation measures to be adopted during the peak construction phase.</p>	<p>The construction phase of the Scheme is predicted to generate a maximum peak of 108 two-way traffic movements per day for the delivery of construction materials. (as reported in 19.5.1 of the ES (document reference 6.1 / PINS document reference APP-136). This includes both Light Goods Vehicle and HGV movements.</p> <p>It should be noted that this represents a peak forecast for the number of construction vehicles which is predicted to occur approximately half way through the 2 year construction period, in Autumn 2020. The number of construction vehicles would be on average, much lower than the peak forecast over the duration of 2 year period.</p> <p>There are three construction compounds and deliveries would be split between the north and the south of Lake Lothing. Assuming a 50/50 split of movements there would be 54 two way movements a day at the peak of construction through Station Square and along Waveney Drive. As the construction hours for the Scheme would be from 07:00 to 19:00, a twelve hour day, this equates to fewer than five HGV movements per hour.</p> <p>As reported in para 10.1.9 of the TA (document</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>reference 7.2 / PINS document reference APP-093) base year traffic data from the SATURN model identifies a flow of approximately 8500 vehicles per day using Waveney Drive of which approximately 1.5%, or 127, constitute HGVs. The number of HGVs that are likely to access the southern compound is 54 which represents a change of less than 1% of total traffic and 43% of HGV's.</p> <p>The IEMA Guidelines set out rules-of-thumb for a screening process in determining the scale and extent of the assessment. This include links where traffic flows are predicted increase by more than 30% (or HGVs increase by more than 30%). On the basis that the 54 vehicles represents a peak which is expected to occur for a very limited period of the construction, and the vast majority of the construction period will not result in vehicle numbers that are over this threshold it can be reasonably expected that the increase in flows will be well below the 30% threshold for the vast majority of the construction phase.</p> <p>Effects upon nitrogen dioxide are measured either against the annual mean objective level of 40µg/m<sup>3</sup> or the hourly mean objective level of 200µg/m<sup>3</sup>. As the threshold for assessment of HGV traffic is only exceeded for a very</p>



Issue number	Rep no.	Name	Relevant response	Response
				<p>limited period of time during the construction phase, an assessment upon the annual mean is not considered appropriate and therefore an appraisal against the hourly mean is preferred.</p> <p>Where hourly monitoring data is not available, a 'rule of thumb' provided by DEFRA identifies that the hourly objective is unlikely to be exceeded where the annual mean is less than 60µg/m<sup>3</sup>. As the highest monitored nitrogen dioxide level was 34.2µg/m<sup>3</sup> 2017 (see Appendix 8B of the Environmental Statement (document 6.2/APP-168)) it is considered highly unlikely that the additional 108 HGVs would result in a change in the nitrogen dioxide level sufficient to breach the hourly average objective level.</p> <p>It is therefore not expected that there would be significant effects arising from construction related traffic and further assessment was not considered necessary.</p>
HT16	RR-017	Northumbrian Water Limited*	<b>HGV trip distribution and assignment</b> – there appears to be no mention of this in the application documents, and we consider the likely trip assignment of HGVs on Waveney Drive should be reviewed and assessed to fully understand the likely impacts (and associated mitigation, if required).	The assumptions relating to the distribution of HGV's during the period of construction are set out in Section 19.5 of the ES (document reference 6.1 / PINS document reference APP-136). As noted above, this assumes a 50% split of movements to the north and south of the Lake. This would result in 54 two-way movements a day at the peak of construction

Issue number	Rep no.	Name	Relevant response	Response
				<p>through Station Square and along Waveney Drive.</p> <p>HGVs would route via the SRN/PRN as far as is practical to minimise the impact on local roads. Paragraph 2.8.3 of the Interim CoCP requires the Contractor to set out the traffic management measures that will be applied during construction in the full CoCP.</p>
HT17	RR-017	Northumbrian Water Limited*	<b>Abnormal HGV loads</b> – there is no mention of this in the application pack. Abnormal loads should be considered, and how they will be managed so as to not interfere with local business operations.	Permission is required from Suffolk County Council in its capacity as the local highway authority to move abnormal loads on the local highway network and Suffolk Police must be notified. On receipt of an application Suffolk County Council will work with the transporting company to agree a safe and suitable route for the load, aiming to minimise impacts on other road users as far as possible. The need to move abnormal loads on the highway network for the Scheme is currently unknown.
HT18	RR-018	Statuslist Limited*	Traffic impact on the use of the Land arising from the New Access Road Statuslist is concerned that the New Access Road is likely to give rise to an increase in traffic flows on the route to the Third Crossing, including HGV and other commercial traffic, both as part of the construction works and accessing the neighbouring commercial	<p>The New Access Road has been developed having regard to Waveney District Council's Local Plan, in particular the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief Supplementary Planning Document (SPD), adopted May 2013.</p> <p>That document states at paragraph 5.24:</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>development.</p> <p>It appears that the design of the New Access Road will comprise an 'Avenue' design with single carriageway street, deciduous tree planting and wide pavements of approximately 4 metres either side of the road, including a segregated cycle lane. The maximum speed limit will be limited to 30 mph.</p> <p>It is noted that the Draft Design Guidance Manual enclosed with the DCO provides that "The new Access Road must provide an adaptable design to accommodate adjacent development in the future. Future development in this area could comprise commercial/residential, requiring careful consideration as the most appropriate solution for these land uses."</p> <p>Statuslist is concerned that that the New Access Road will bring increased through traffic, most significantly HGVs and other commercial traffic, through the Land, which will limit the options for the use and development of those areas of the Land fronting onto the New Access Road. In this respect, the requirements of the above Guidance will not be satisfied and a negative impact on the use of the Land will inevitably result.</p>	<p>"Developers should consider the long-term aspiration of the Council to secure a third vehicular crossing over Lake Lothing. As such, avenues through the eastern part of the site should be built within a corridor that can accommodate upgrading to a specification to accommodate any future proposal for a third road crossing over Lake Lothing. Developer's should speak to the Highway Authority to ascertain the standards required. It will be important that development of the SUN does not restrict future opportunities to deliver a third river crossing."</p> <p>The Applicant is, in line with this policy, providing an 'Avenue' style design for the New Access Road, as envisaged in the SPD, and as set out in the Design Guidance Manual (document reference 7.2/PINS document reference APP-133), compliance with which is secured through the DCO.</p> <p>The Scheme proposals are such that Scheme traffic is to a greater extent separated from local traffic by the combination of an elevated embankment for through traffic and a New Access Road for local traffic. Consequently, the impact of the traffic associated with a Third Crossing on this development site has been</p>

Issue number	Rep no.	Name	Relevant response	Response
			<p>This gives rise to serious concerns regarding the potential negative impact the New Access Road will have on the future use of the Land and, in particular, proposed future residential and commercial development.</p>	<p>reduced as far as is possible.</p> <p>The Applicant notes that SCC/WDC has agreed in its SoCG that the design of the New Access Road “is appropriate having regard to the nature and scale of development that it is envisaged to serve” and further that “the New Access Road is located in such a way to facilitate the regeneration of the former Jeld-Wen site, as envisaged in WDC’s Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief (2013).”</p> <p>Indeed, the Applicant considers the Scheme is advantageous for the landowner insofar as an access road of a specification envisaged in the Local Plan is being brought forward by the highway authority, that would otherwise need to be delivered by the landowner.</p> <p>In the absence of a planning permission, a planning application or even a policy compliant Masterplan for this development site, the Applicant has included within the application a specification for a New Access Road that is sufficient to address the needs of the Scheme, but can also be refined in accordance with the detailed requirements of the landowner when their development proposals are more certain. As such the Applicant considers that the</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>Scheme proposals are fully compliant with local policy, compatible with future developments and flexible enough to accommodate the internal highway layout of the site, once known.</p> <p>Consequently rather than limiting the options for the use and development, the Scheme would facilitate opportunities for development by significantly improving the accessibility of key areas around the Lake, including Kirkley Waterfront. At present, the poor accessibility makes it difficult to achieve regeneration in this area, which has suffered from the loss of traditional industry and related unemployment.</p> <p>The increases in traffic on the roads leading to the Scheme would be more than outweighed by significant reductions in traffic and congestion on other parts of the network. The Scheme affords significant relief to both existing crossings and a reduction in journey times on the key route corridors through the town, during all time periods. This would be particularly significant during times of lifting of the A47 Bascule Bridge where the Scheme would provide an alternative route.</p> <p>The construction phase of the Scheme is predicted to generate a maximum peak of 108</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>two-way traffic movements per day for the delivery of construction materials.</p> <p>There are three construction compounds and deliveries would be split between the north and the south of Lake Lothing. Assuming a 50/50 split of movements there would be 54 two-way movements a day at the peak of construction along Waveney Drive. As the construction hours for the Scheme will be from 07:00 to 19:00, a twelve-hour day, this equates to fewer than five HGV movements per hour. However, this represents a peak forecast for the number of construction vehicles, and it is considered likely that a number of construction vehicles would be on average, much lower than the peak forecast over the duration of 2-year period.</p> <p>As noted above, engagement continues between Statuslist and the Applicant to resolve the outstanding issues.</p>
HT19	RR-023	Broadland Housing Group*	We do however express concern over the impact the construction of the bridge will have on our tenants and local community, and the expectations of traffic volume once the bridge is completed? For example; will the new Lake Lothing Crossing attract more traffic causing further congestion within the area? It would be	It is acknowledged that the Third Crossing would result in a significant increase in traffic on Waveney Drive which provides a direct connection to the New Bridge. While there will be increases in traffic volumes this will not result in congestion since the junctions will be designed to accommodate the predicted

Issue number	Rep no.	Name	Relevant response	Response
			beneficial to understand how this will be managed, particularly at times when the bridge is closed for the passing of vessels?	<p>volumes of traffic.</p> <p>The local impact on Waveney Drive will however be offset by the reduction in congestion and delays over a wider area that will result in quicker and more reliable journeys in the town.</p> <p>By providing an alternative to the existing crossings there would be significant reductions in traffic on the existing A47 Bascule Bridge, which is a bottleneck.</p> <p>The Scheme would also reduce traffic levels on the A47 as it passes through the town centre and the northern part of the town and on the A1117 through Mutford Lock and along Normanston Drive. The Scheme would also deliver significant benefits in terms of reducing congestion and delay on the local road network and would alleviate serious bottlenecks on the main road network. This would be particularly significant during times of lifting of the Bascule A47 Bridge where the Scheme would provide an alternative route.</p> <p>Details of predicted traffic flow with and without the Scheme are presented in the Transport Assessment (document reference 7.2/ PINS document reference APP-093).</p>

Issue number	Rep no.	Name	Relevant response	Response
HT20	RR-002	Stephen Berry	My only concern about the whole project, is the impact of making Durban Rd a cul-de-sac. I don't think enough provision has been made for no parking, i.e. double yellow lines in Durban Rd. Or the bottom section of Kimberley Rd. Wheelie bin services struggle to negotiate this area now. It is a delivery driver's nightmare at times. By the time this project is completed, we should have Civil Enforcement Officers upholding parking restrictions. It may also help if some kind of speeding restriction was brought in.	There is already local concern about the lack of on-street parking in this area so the extent of proposed new parking restrictions has been kept to the minimum required, as informed by on site investigations and the Applicant chartering a bus (in the company of Waveney Gymnastics Club) to assess the necessity of such restrictions (Waveney Gymnastics Club is a regular users of coaches which would otherwise access the Club via Durban Road, which is proposed to be stopped up to vehicular traffic at its junction with Waveney Drive) The introduction of local Civil Parking Enforcement (transferring of parking enforcement from the police to Waveney District Council) is likely to allow more effective enforcement in the future. The Applicant does not consider a speed restriction necessary as the nature of the roads and indeed on street parking serves to reduce such speeds.
HT21	RR-004	Derek Johnson	Comments on access and usability of vehicle from Beccles to Lowestoft town. Assessment of impact project will have on journey times at peak/off peak, week day/ weekend. Consideration of difference to perception of Lowestoft for access and usage at work and leisure compared to current.	Lake Lothing and The East Suffolk Line are barriers to movement resulting in community severance and poor accessibility for traffic, buses, cyclists and pedestrians. This is compounded by queuing and delay at the existing A47 Bascul Bridge at the harbour entrance, at the A1117 Mutford Bridge, and the level crossing, which create pinch points.



Issue number	Rep no.	Name	Relevant response	Response
				<p>Journeys for work and other purposes are slow and inefficient as a result, especially in the morning and evening peak periods. The problems of queuing and delay become even worse when the bridges have to be lifted, and therefore closed to traffic, in order to allow vessels to pass through.</p> <p>The Scheme would provide a high standard route for north – south traffic that would improve connectivity between the two halves of the town as well as accessibility to and from Lowestoft.</p> <p>The Scheme would afford significant relief to both existing crossings and a reduction in journey times on the key route corridors through the town, during all time periods. This would be particular significant during times of closure of the Bascul Bridge where the Scheme would provide an alternative route. The reduced journey times would in turn have a beneficial effect on businesses and local residents.</p> <p>An analysis of predicted journey times from the SATURN traffic model has been undertaken of the travel time in both directions between the A145 London Road south of Beccles and Lowestoft, via the A146. Figure G-1 in</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>Appendix G details the extent of the journey time routes which have been analysed. This builds upon the strategic route journey time analysis presented in Section 6.3 of the TA (document reference 7.2 / PINS document reference APP-093).</p> <p>The journey times over both the Mutford Bridge and A47 Bascule Bridge have been looked at it in more detail.</p> <p>The Table G-1 in Appendix G to this document shows the change in journey time with and without the Scheme between Beccles and the A47 / Dukes Head Street / St Peter's Street roundabout. The assumed route analysed includes the A145 through Beccles, then heading eastbound via the A146, Victoria Road, Waveney Drive, A12 and northbound over the A47 Bascule Bridge via the A47. This shows that the Scheme would result in a decrease in travel time of between 1-3 minutes in the AM and PM peak hours due to the easing of congestion on the A47 Bascule Bridge.</p> <p>Table G-2 in Appendix G shows the change in journey time with and without the Scheme between the A47 / Dukes Head Street / St</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>Peter's Street and Beccles for the opposite travel direction presented in Table G-1 i.e. southbound over the A47 Bascule Bridge, then westbound via Waveney Drive, Victoria Road and the A146 to Beccles onto the A145. This shows that the Scheme would result in a decrease in travel time of 1-2 minutes due to the easing of congestion on the A47 Bascule Bridge.</p> <p>Table G-3 in Appendix G shows the change in journey time as a result of the Scheme between Beccles and the A1117 / Peto Way roundabout. The assumed route analysed includes the A145 through Beccles, then heading eastbound via the A146 and then northbound over the Mutford Bridge via the A1117. This shows the Scheme would result in a small decrease in travel time due to the easing of congestion on the Mutford Bridge.</p> <p>Table G-4 in Appendix G shows the change in journey between the A1117 / Peto Way roundabout and Beccles for the opposite travel direction presented in Table G-3 i.e. southbound over the Mutford Bridge via the A1117, then westbound via the A146 to Beccles onto the A145. This shows that due to the easing of congestion on the Mutford Bridge, the Scheme would result in a decrease</p>

Issue number	Rep no.	Name	Relevant response	Response
				<p>in travel time of up to 2 minutes in the AM and PM peak hours.</p> <p>In summary the Scheme would reduce journey times on the existing routes between Beccles and Lowestoft via the A146 providing a significant benefit to road users travelling between these two locations.</p>
HT22	RR-005	John Corkett	<p>I am seeking an understanding of the traffic "tidal flow" and how it will operate each day. It seems to me that the tidal flow at the present bridge is the wrong way around with only one lane into the North of the Town after midday. Will this flow on the new bridge operate the opposite way? For example, two lanes out in the morning at the present bridge. I would like to see the opposite flow on the new structure.</p>	<p>Unlike the A47 Bascule Bridge, the new bridge would be constructed as a single carriageway crossing. There are no proposals to operate the new bridge on a tidal basis during peak periods.</p> <p>The forecast peak hour flows on the Scheme bridge are set out in the table in Appendix H to this document, which shows the relative proportion of northbound and southbound flows on the Scheme by each time period modelled. This analysis demonstrates the balance of flows between the two directions is evenly split suggesting there is no significant tidality in the Scheme flows.</p>
HT23	RR-010	Mr R Cousin	<p>Parking restrictions and access during build phase for local residents.</p> <p>Resident only parking areas during and after</p>	<p>There is no intention to implement residents only parking schemes as part of the delivery of this project.</p>

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Issue number	Rep no.	Name	Relevant response	Response
			build completion.	The proposals for parking upon completion of the Scheme are set out in the Traffic Regulations Measures (Prohibitions) Plans Sheets 2 and 3 (document reference 2.6, PINS document reference APP-030 and APP-031).

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## 9 Socio-economic

### 9.1 Overview

- 9.1.1 This theme covers the extent to which the Scheme would result in any socio-economic benefits in terms of national, regional and local economy.
- 9.1.2 Two interested parties raised issues on the economic benefits for the Scheme. Table 9-1 provides a summary of the matters raised on the theme, alongside a response from the Applicant.

## 9.2 Key issues

*Table 9-1 Matters raised on socio-economics*

Issue number	Rep no.	Name	Relevant response	Response
SE1	RR-007	Great Yarmouth Borough Council	The Council would largely reiterate the comments as submitted in response to the Environmental Impact Assessment (EIA) Scoping Consultation. These sought to highlight the socio-economic impact of the proposal upon Great Yarmouth; drawing attention to the New Anglia Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP) which recognises both Great Yarmouth and Lowestoft as 'Growth' locations, particularly well placed to capitalise on the offshore energy sector as the main opportunity for growth. It is considered that the Lake Lothing Third Crossing will better enhance the connectivity between the Enterprise Zone (EZ) sites, particularly where this concerns the location of the two EZ sites south of Lake Lothing (Riverside Road & Lowestoft Industrial Estate). It should be noted that connectivity will be further enhanced between the Great Yarmouth and Lowestoft Enterprise Zone sites through the future implementation of the Great Yarmouth Third River Crossing, which will provide a more direct route between the Great Yarmouth 'deep water' Outer Harbour and South Denes Industrial Estate (important areas for the energy sector supply chain) to the A47	<p>The Council's support for the Scheme is welcomed.</p> <p>The Applicant considers that the Scheme will help to reduce congestion, improve journey times and journey time reliability, improve safety and enhance connectivity for communities and businesses. This in turn will enhance business productivity and help to deliver regional economic growth.</p> <p>More detail is included in the CftS (document reference 7.1 / PINS document reference APP-091) which recognises the importance of the Scheme to the Great Yarmouth and Lowestoft Enterprise Zone and the Economic Report (document reference 7.3 / PINS document reference APP-106).</p>

Issue number	Rep no.	Name	Relevant response	Response
			and Lowestoft.  Overall, the Borough Council supports this proposal and recognises the wider joint benefits that this infrastructure project (along with other projects) will bring to Lowestoft and Great Yarmouth.	
SE2	RR-004	Derek Johnson	What is the possible value of the project to tourism or engineering interest	<p>In improving highway conditions in Lowestoft, this will inherently benefit visitors and the visitor economy.</p> <p>As stated in paragraph 7.6.23 of the CftS (document reference 7.1 / PINS document reference APP-091):</p> <p>“there is a major beneficial impact on Lowestoft town centre during operation of the Scheme due to the reduction in journey times on the road network. This also benefits tourism and recreational access across Lake Lothing. In addition, there is a minor beneficial impact during operation related to access to the Broads, due to reduced traffic flows, which will improve access to tourism. There is also a negligible impact on tourist accommodation during the construction and operation of the Scheme. Furthermore, the Scheme delivers greater connectivity to destinations north and south of Lake Lothing for all modes, notably Normanston Park and the North Quay retail</p>



Issue number	Rep no.	Name	Relevant response	Response
				<p>area in the north and Asda in the south. Overall, it can therefore be demonstrated that the Scheme delivers tourism and recreation related benefits in communities adjacent to the Plan area.”</p> <p>The mechanism design for the opening span of the bridge has been designed in such a way that it provides a striking feature for Lowestoft’s skyline. The position of the Scheme in the centre of the town geographically, as well as the shape and scale of the superstructure mean it will contribute to the emerging identity of Lowestoft and be a landmark that is associated with the town.</p> <p>The event of a road bridge opening is conceived as a spectacle in itself, during which residents and visitors can observe the rolling superstructure in motion. The design narrative aims to provide an ‘honest’ design which makes the function of each structural component obvious to all so they may understand how it works. This will provide interest to locals, tourists, and the younger generation to spark an interest or curiosity in engineering. The lighting design will also ensure the Scheme is a special feature at night too.</p>

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Issue number	Rep no.	Name	Relevant response	Response
				Details of the design development are included in the Design Report (document reference 7.5 / PINS document reference APP-123).

## Appendix A. Traffic Flows on Waveney Drive

*Table A-1 Traffic flow changes on Waveney Drive (west of New Access Road)*

Forecast Year	Without Scheme	With Scheme	Abs Diff	% Diff
2022	7927	13287	5360	68%
2037	9565	16929	7364	77%

*Table A-2 Traffic flow changes on Waveney Drive (between New Access Road and Southern roundabout)*

Forecast Year	Without Scheme	With Scheme	Abs Diff	% Diff
2022	8239	14666	6427	78%
2037	9782	18551	8769	90%

*Table A-3 Traffic flow changes on Waveney Drive (Lings Access to A12)*

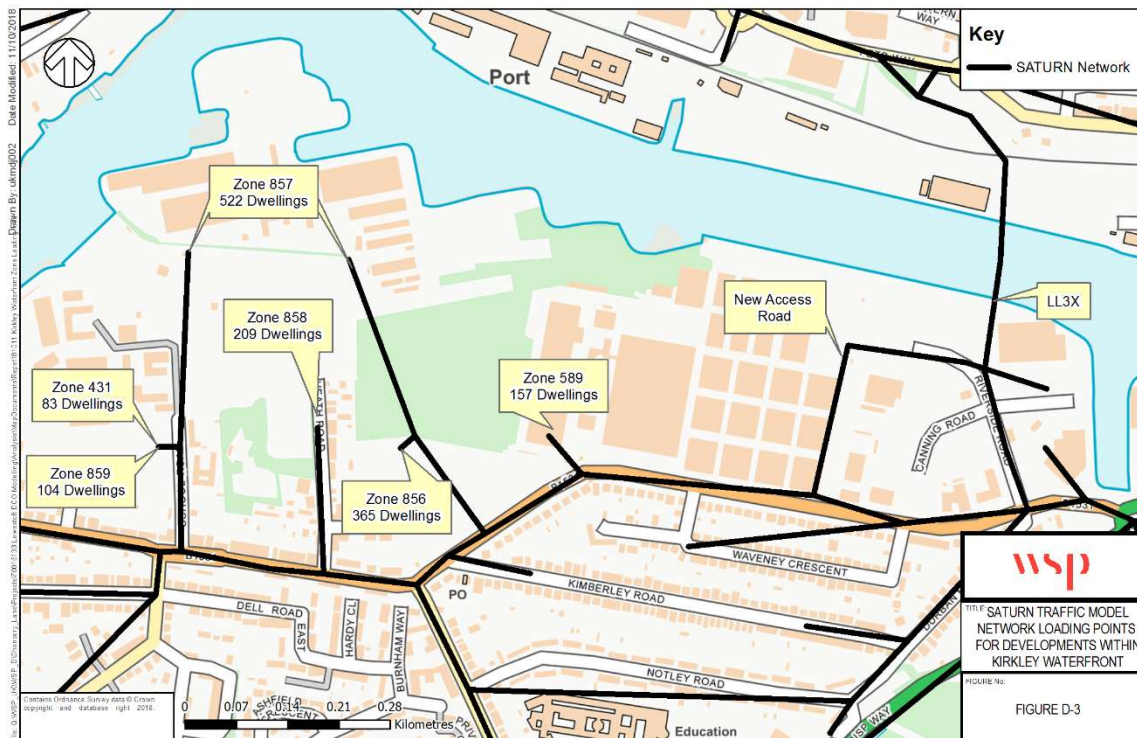
Forecast Year	Without Scheme	With Scheme	Abs Diff	% Diff
2022	10616	26968	16352	154%
2037	12006	30411	18405	153%

## Appendix B. Victoria Road / Waveney Drive link distances in metres



Figure B-1: Victoria Road / Waveney Drive link distances in metres

## Appendix C. SATURN Traffic model network showing loading points for Developments in Kirkley Waterfront



*Figure C-1 SATURN Traffic model network showing loading points for Developments in Kirkley Waterfront*

## Appendix D. Traffic demand changes to/from Riverside Business Park & Lings Motor Group

*Table D-1 Traffic demand changes to/from Riverside Business Park & Lings Motor Group – 2016 Base, 2022 & 2037 Do Minimum*

Model	Origin (Dep)	Dest (Arr)	Total	% vs BY	Model	Origin (Dep)	Dest (Arr)	Total	% vs BY
AM 2016 Base	43	249	292	-	PM 2016 Base	173	33	206	-
AM 2022 Do Min	47	267	314	7.5%	PM 2022 Do Min	186	35	221	7.0%
AM 2037 Do Min	55	303	358	22.4%	PM 2037 Do Min	209	40	249	20.5%

*Table D-2: Split of traffic demand to/from Lings Motor Group & Riverside Business Park – 2022 & 2037 Do Something*

Model	Zone	Origin (Dep)	Dest (Arr)	Total	Model	Zone	Origin (Dep)	Dest (Arr)	Total
AM 2022 Do Min	773 (Lings)	12	27	39	PM 2022	773 (Lings)	30	14	44
AM 2037 Do Min	773 (Lings)	12	28	40	PM 2037	773 (Lings)	30	15	45
AM 2022 Do Min	910 (Riverside)	36	243	279	PM 2022	910 (Riverside)	158	19	178
AM 2037 Do Min	910 (Riverside)	47	279	326	PM 2037	910 (Riverside)	175	33	208



## Appendix E. Traffic flow changes on B1531 and A146

*Table E-1: Traffic flow changes on B1531 Victoria Road adjacent to level crossing*

Forecast Year	Without Scheme	With Scheme	Abs Difference	% Difference
2022	11796	5446	-6322	-54%
2037	14176	7236	-6940	-49%

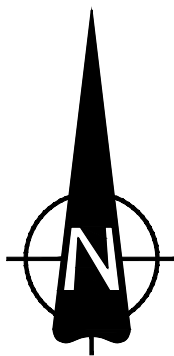
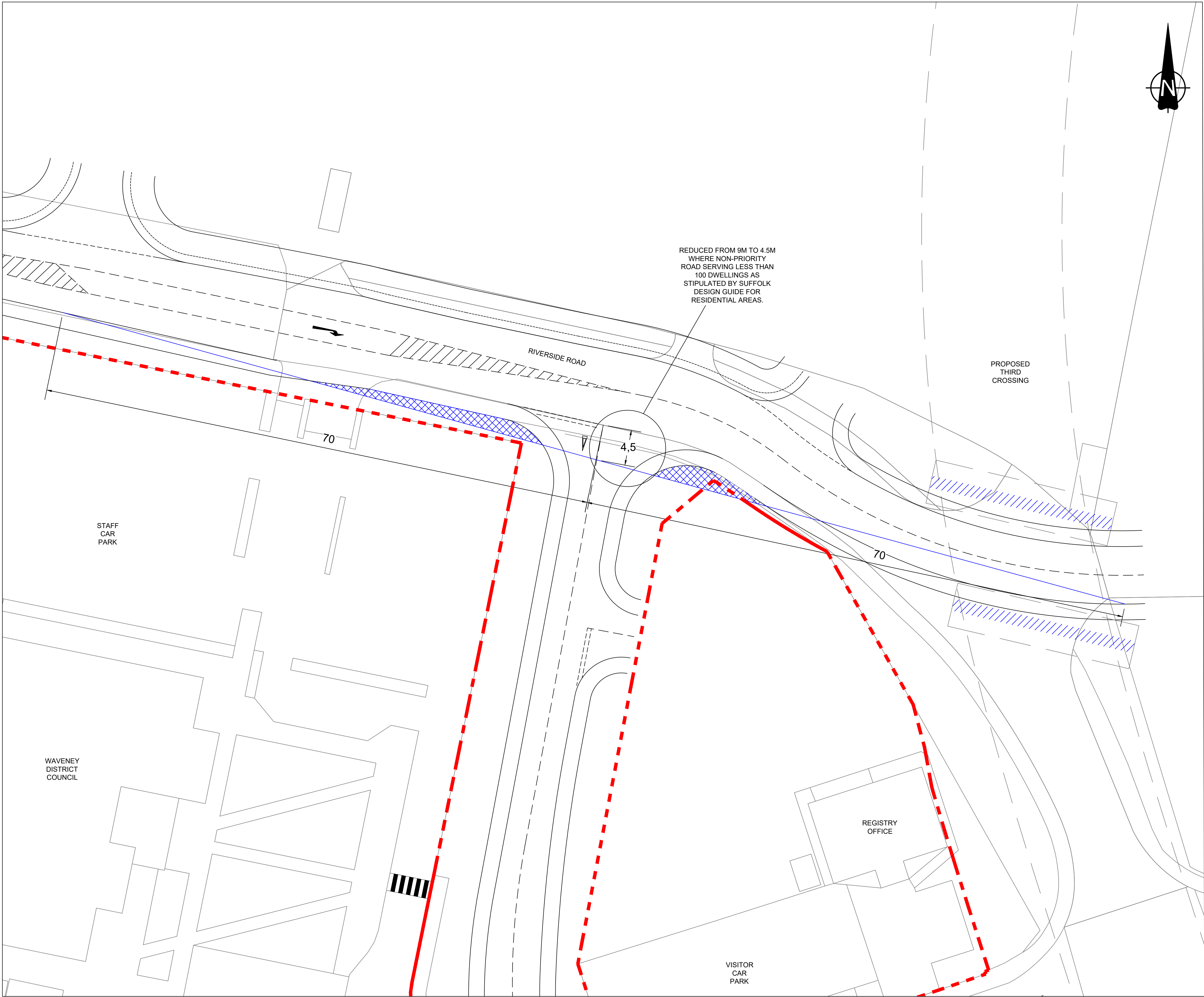
*Table E-2: Traffic flow changes on A146 Bridge Road adjacent to level crossing*

Forecast Year	Without Scheme	With Scheme	Abs Difference	% Difference
2022	29976	20917	-9059	-30%
2037	32110	24160	-7949	-25%

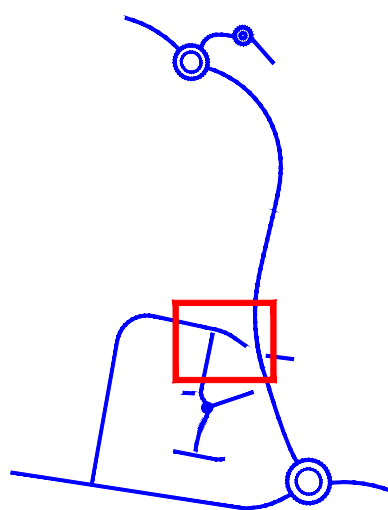
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## Appendix F. Visibility requirements for proposed Canning Road /Riverside Business Park





KEY PLAN



LEGEND

- REQUIRED VISIBILITY ZONE
- ORDER LIMITS

NOTE

1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED
2. THE WORKS WILL BE SUBJECT TO DETAILED DESIGN DEVELOPMENT IN ACCORDANCE WITH THE DEVELOPMENT CONSENT ORDER
3. THESE WORKS PLANS SHOULD BE READ IN CONJUNCTION WITH THE ENGINEERING SECTION DRAWINGS AND PLANS; THE DEVELOPMENT CONSENT ORDER PROVIDES FOR VERTICAL DEVIATION WITH REFERENCE TO THE LEVELS OF THE WORKS SHOWN ON THE ENGINEERING SECTION DRAWINGS AND PLANS.

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P02	SR	JC	PC	15/11/18
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INSETS REMOVED AND OTHER AMENDMENTS

REVISION	DRAWN	CHECKED	APPROVED	DATE
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DESCRIPTION



PROJECT TITLE

Lake Lothing  
**THIRD CROSSING**

DRAWING TITLE

VISIBILITY REQUIREMENTS FOR  
PROPOSED CANNING ROAD  
FOR RIVERSIDE BUSINESS AREA

DRAWING STATUS

FOR EXAMINATION

DRAWN	CHECKED	APPROVED	AUTHORISED	SUITABILITY
SR	JC	PC	JB	S3

SCALE @ A1 SIZE	DATE	REVISION
1:1250	06/10/2017	P02

DRAWING NUMBER			
Project	Originator	Volume	
1069948-WSP-HGN-LL3X-DR-CH-0103			
Location	Type	Role	Number

## Appendix G. A47 Bascule Bridge and Mutford Bridge journey time routes

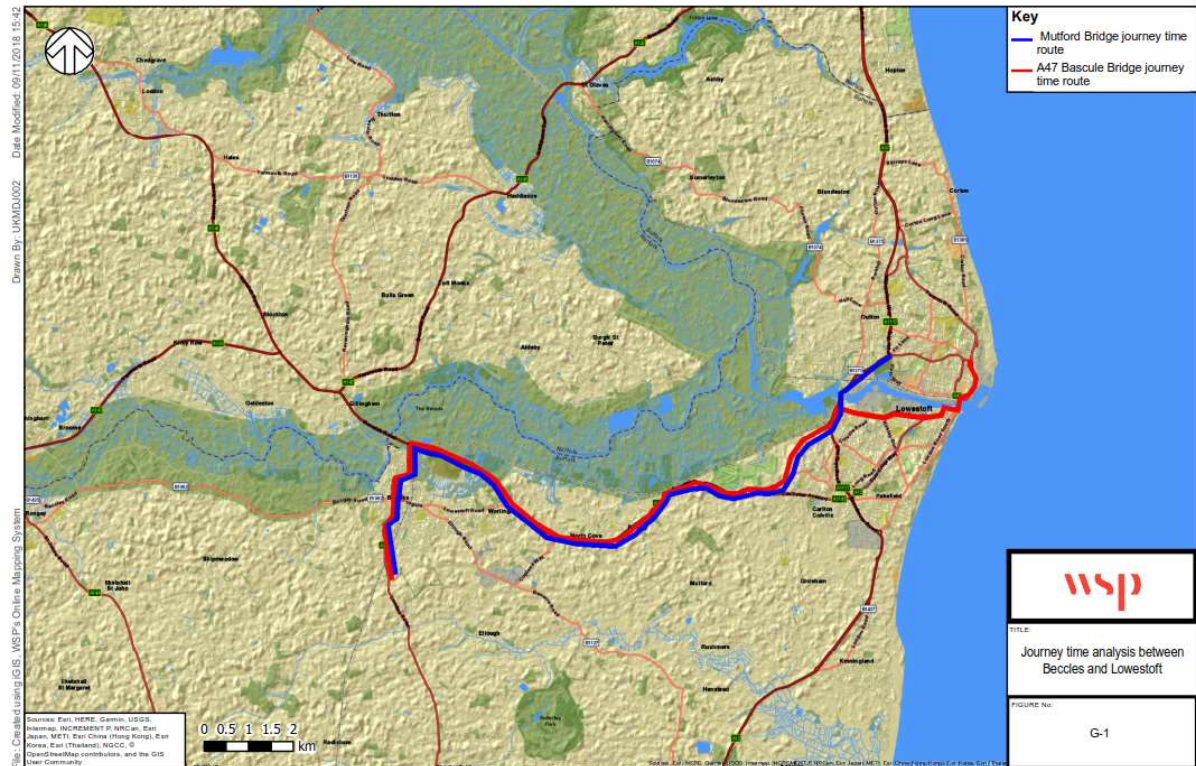


Figure G-1 Journey time routes between Beccles and Lowestoft

*Table G-1 A47 Bascule Bridge journey time route – Beccles to Lowestoft (Eastbound / Northbound)*

Time Period / Forecast Year	Journey Time Route Distance (KM)	Do Minimum: No Scheme – Travel Time (Minutes)	Do Something: With Scheme – Travel Time (Minutes)	% Change in Journey Time
AM 2022	19.4	29	28	-4%
Inter peak 2022	19.4	30	27	-12%
PM 2022	19.4	30	28	-5%
AM 2037	19.4	30	29	-5%
Inter Peak 2037	19.4	34	28	-18%
PM 2037	19.4	32	29	-7%

*Table G-2 A47 Bascule Bridge journey time route – Lowestoft to Beccles (Southbound / Westbound)*

Time Period / Forecast Year	Journey Time Route Distance (KM)	Do Minimum: No Scheme – Travel Time (Minutes)	Do Something: With Scheme – Travel Time (Minutes)	% Change in Journey Time
AM 2022	19.7	30	29	-4%
Inter Peak 2022	19.7	28	28	-3%
PM 2022	19.7	31	29	-5%
AM 2037	19.7	32	30	-6%
Inter Peak 2037	19.7	30	29	-3%
PM 2037	19.7	32	30	-6%



*Table G-3 Mutford Bridge journey time route – Beccles to Lowestoft (Eastbound / Northbound)*

Time Period / Forecast Year	Journey Time Route Distance (KM)	Do Minimum: No Scheme – Travel Time (Minutes)	Do Something: With Scheme – Travel Time (Minutes)	% Change in Journey Time
AM 2022	17.0	23	23	-3%
Inter Peak 2022	17.0	23	22	-4%
PM 2022	17.0	24	24	-3%
AM 2037	17.0	25	24	-4%
Inter Peak 2037	17.0	27	23	-13%
PM 2037	17.0	26	25	-5%

*Table G-4 Mutford Bridge journey time route – Lowestoft to Beccles (Southbound / Westbound)*

Time Period / Forecast Year	Journey Time Route Distance (KM)	Do Minimum: No Scheme – Travel Time (Minutes)	Do Something: With Scheme – Travel Time (Minutes)	% Change in Journey Time
AM 2022	17.4	26	24	-6%
Inter Peak 2022	17.4	26	24	-7%
PM 2022	17.4	27	26	-7%
AM 2037	17.4	27	25	-7%
Inter Peak 2037	17.4	27	26	-6%
PM 2037	17.4	29	27	-7%

## Appendix H. recast peak hour flows for the Scheme

*Table H-1: Forecast peak hour flows on the Scheme bridge*

Time Period / Forecast Year	Northbound Flow (PCUs/hr)	Southbound Flow (PCUs/hr)	Northbound % of Two-Way Flow	Southbound % of Two-Way Flow
AM 2022	1145	1126	50.4%	49.6%
Inter Peak 2022	1295	1273	50.4%	49.6%
PM 2022	1171	1148	50.5%	49.5%
AM 2037	1363	1339	50.4%	49.6%
Inter Peak 2037	1174	1286	47.7%	52.3%
PM 2037	1292	1437	47.4%	52.6%