

PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

**WRITTEN REPRESENTATIONS REGARDING THE APPLICATION BY SUFFOLK
COUNTY COUNCIL FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE
LAKE LOTHING THIRD CROSSING**

PLANNING INSPECTORATE REFERENCE NUMBER TR010023

WRITTEN REPRESENTATIONS MADE ON BEHALF OF:

**20013284 - OVERSEAS INTERESTS INC
20013285 - WAVENEY FORK TRUCKS LIMITED
20013286 - LIFT TRUCK RENTALS LIMITED,
20013287 - NEXEN LIFT TRUCKS LIMITED,
20013288 - OAKES RECRUITMENT LIMITED,
20013289 - TEAM OAKES LIMITED
20013290 - HITECH GRAND PRIX LIMITED**

DATE OF REPRESENTATIONS: 8 JANUARY 2019

Introduction and background

- 1 We act for 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. As with the relevant representations that we have previously submitted, these representations have been made on behalf of each of our clients.
- 2 Overseas Interests Inc is the registered proprietor of land registered under title number SK264748 ("**the Land**"). A significant proportion of the Land falls within the draft Order limits as amended in April 2018. Waveney Fork Trucks Limited, Lift Truck Rentals Limited, Nexen Lift Trucks Limited, Oakes Recruitment Limited, Team Oakes Limited and Hitech Grand Prix Limited carry on various business activities on the Land.
- 3 The businesses that are carried on at the Land are all family run businesses and have a great affinity with Lowestoft and the surrounding area. Our clients have always been centred in Lowestoft and the earliest of these began trading in 1974. Our clients current employ 78 employees over all of the companies and approximately 90% of these live within a 10 mile radius of Lowestoft. Our clients have an ethos of using local suppliers wherever possible.
- 4 We are also informed that Hitech Grand Prix Limited have recently secured the operational contract (including all logistics and engineering support) for the new woman-only motorsport series, W Series, which involves running an additional 20+ cars from the Land which will increase the traffic to and from the Land with at least 10 – 22 additional vehicles.
- 5 We have previously sought to engage with Suffolk County Council ("**Applicant**") and their legal representatives prior to the submission of the DCO application. Our clients' representatives continue to seek to engage with the Applicant and their consultant team.
- 6 Our clients continue to object to the Application for the reasons set out in the relevant representations previously submitted on behalf of our clients and expanded upon in this representation.
- 7 We note that question 3.3 of the Examining Authority's written questions, directed to the Applicant, asks the Applicant to confirm what measures have been put in place to ensure continued access to the Land by all delivery vehicles during the course of construction. We reserve our clients' position to respond to any answers the Applicant provides to this question and note that such a response by our clients must be received by the Examining Authority by 29 January 2019.
- 8 However, it is considered at this stage that the Examining Authority should have posed a broader question of the measures the Applicant has put in place to ensure continued access to the Land not only during the construction period but also during the operational phase of the project. In addition, it is not only access to the Land for delivery vehicles that our clients maintain their concerns about but also the suitability of access within the Land, access for staff employed by the existing businesses and access for the construction and operation of any development carried out on the part of our clients' land which is identified by the Applicant as Plot 3-56 and has been long earmarked by our clients for redevelopment.

- 9 We also note that Waveney District Council have been asked (at 3.1 of the Examining Authority's written questions) what evidence there is of active development proposals on the identified plots which would be compromised by the acquisition of land to facilitate the bridge proposals. For the reasons set out in detail below, our clients' proposed development of the Development Land (as defined below) is compromised (and completely sterilised during the construction period and potentially beyond subject to a suitable access solution being provided) and we trust that Waveney District Council shall confirm this in their response to this question.

Impact our clients' businesses

10 Access during construction phase of the proposed project

- 10.1 The most basic and obvious concern that our clients have is that the proposed project has been designed to be constructed in a manner which physically cuts off the Land from the local highway network.
- 10.2 In addition the proposed new access to the Land during construction and the operational phase is land over which our clients will have no access rights or comfort that these shall be provided during the construction or on the completion of the proposed project.
- 10.3 It is considered that at present the Land is unlettable until at least the conclusion of the construction works and beyond unless a suitable access solution can be provided and secured.
- 10.4 The Interim Code of Construction Practice set out at Appendix 5A of the Environmental Statement states at paragraph 2.1.1 that the proposed project will take approximately two years to complete. This is a lengthy period of time for our clients to have serious doubts about suitable access arrangements to and within the Land.
- 10.5 We note that paragraph 2.7.1 of the Interim Code of Construction Practice set out at Appendix 5A of the Environmental Statement submitted by the Applicant states that the Contractor must allow access from the public highway to "Nexen Trucks" during the construction of the Scheme but there is no detail in terms of how this will be achieved which would provide our clients with any comfort that such arrangements will be adequate for their operational purposes. Indeed there is no detail about how such an obligation would be legally enforceable by them.
- 10.6 Our clients welcome an obligation to allow access from the public highway to the Land during construction but have not been provided with satisfactory information that this shall be achievable in practice or is possible from a technical perspective. In addition, as set out in more detail below, it is not only access to and from the Land which our clients have concerns about but also movements of vehicles and equipment within the Land and the security and integrity of the Land during the construction works.
- 10.7 In light of the above, our clients have no comfort that any Code of Construction Practice approved under paragraph 4 of Part 1 to Schedule 2 of the draft DCO would be acceptable to them given that this is required to be in accordance with the current Interim Code of Construction Practice.

- 10.8 In this regard, our clients are also concerned about the deemed discharge provisions which are incorporated at Part 2 of Schedule 2 of the draft DCO which would mean that any application to discharge the requirements set out in the draft DCO would be deemed to be granted if the discharging authority does not respond within 6 weeks. This does not give our clients comfort that applications to discharge requirements will be suitably scrutinised by the discharging authority. In any event the approved Code would only be enforceable by the discharging authority.
- 10.9 As summarised below and set out in the technical report at **Appendix 2**, whilst the Applicant has suggested an alternative access arrangement this does not address access during the construction period of the proposed project (and is flawed in any event for the reasons highlighted above and below).
- 10.10 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. A significant percentage of our clients' businesses involve critical delivery times and it is essential that our clients, their suppliers and their customers have unfettered and unrestricted access to the Land at all times.
- 10.11 Our clients also have regular visits from foreign customers who expect a completely professional operation when attending our clients. Our clients fear that their ability to secure new work from these investors will be severely affected if they have any problems in accessing the Land or have any concerns about our clients' ability to carry operations on the Land. These contracts are in excess of six figures and are critical to the business operations on the Land.
- 10.12 Our clients fear that their entire production and supply chain would collapse if their suppliers are unable to deliver goods to them without hindrance at all times. Our clients' businesses have goods both arriving and departing the Land all week.
- 10.13 We note Table 15-4 of the Environmental Statement submitted by the Applicant sets out that *"access to the site will be maintained during construction, except in exceptional circumstances"*. It is simply not acceptable to our clients that access to the Land will not be maintained under all circumstances.
- 10.14 If there are any doubts about the continuity of access or potential for circumstances where access will not be possible then the Applicant needs to provide a further temporary means of accessing the Land during the construction process which can be guaranteed to be open and available to use at all times.
- 10.15 Any interruption to continuous access to the Land 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. As set out above, it is not only access to the Land which is of concern to our clients but also satisfactory movements within the Land and no information has been provided which gives our clients comfort on these points.

- 10.16 Notwithstanding our clients' concerns about the operational phase of the project discussed below, in relation to the construction phase alone, if it is not possible for the concerns set out to be suitably addressed or mitigated we require confirmation that the Applicant shall be required to relocate our clients' businesses at the Applicant's cost during the construction phase and until a suitable access solution for the Land is provided. An obligation should be placed on the Applicant in the DCO to do this. Our clients would also require the loss of confidence of customers in a compromised business operation to be compensated.

11 Consideration of alternatives

- 11.1 We have set out in previous correspondence to the Applicant/their legal advisors (which can be produced on request if required) that a new access to both the Motorlings site and the Land (including the Development Land (as defined below)) to the east of the current Motorlings site is the only robust option to ensure that our clients can continue to operate on the Land and also ensure that the future development of the Development Land remains feasible.
- 11.2 We understand that this option has been dismissed by the Applicant on the basis that Motorlings were not supportive of this option. We consider that the Applicant should have considered a wider range of factors than this when considering this option, particularly given that it intends to temporarily acquire part of the Land to accommodate Motorlings during the construction period (see further below).
- 11.3 As set out in further detail in the technical reports at **Appendices 1 and 2** our clients have previously suggested an alternative of moving the alignment of the proposed project approximately 8m further west. It is our clients' position that this would not compromise the adherence of the proposed project to required highway design standards and would help to alleviate our clients' concerns about the effects on vehicle movements within the Land. It is acknowledged that this alternative would still need to provide a suitable underpass (or underpasses) to allow suitable access to and from the Land. Our clients' position is that this proposed alternative demonstrates that the compulsory acquisition of Plots 3-29 and 3-30 are not required for the proposed project to which the DCO relates, or is required to facilitate, or is incidental to, the development and given the concerns expressed about the current arrangements there is no compelling case in the public interest for this compulsory acquisition.

12 On-going discussions regarding the suitability of the access arrangements

- 12.1 It is acknowledged that the Applicant has suggested a proposed underpass solution to our clients for the operational phase of the proposed project. However, for the reasons set out below, our clients have not been provided with satisfactory and technically sound evidence to demonstrate that such a solution is workable in practice.

- 12.2 We are aware that our clients' advisors are continuing to try and work with the Applicant and their consultant team to discuss suitable access arrangements to and within the Land.
- 12.3 We understand that an element of progress has been made and the Applicant has now confirmed that an underpass with a minimum clearance height of 6.5m shall be provided in the location of the underpass proposed under the submitted scheme. This should be secured and included as a requirement in draft DCO. This is also despite plan 1069948-WSP-HML-LL-DR-CH-0201 indicating a minimum headroom of 5.3 metres for this proposed underpass. Nevertheless, our clients still have a number of technical concerns with the proposed solutions provided by the Applicant. These concerns are explored further and in more detail in the technical reports at **Appendices 1 and 2**.
- 12.4 Notwithstanding our clients' concerns about the solution that has been proposed, given the importance of the height of the proposed underpass to our clients' businesses during the operational phase of the project, the limits of deviation allowed for in Part 2 Article 5 of the draft DCO for Work No. 1E should ensure that no vertical deviation below the minimum clearance height of 6.5m will be permitted. At present we note that a downward vertical limit of deviation of 1.1m is provided for.

13 Access during the operational phase of the proposed project

- 13.1 As set out in our clients' relevant representations, 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.
- 13.2 This access arrangement is crucial to ensure that HGV movements do not conflict with car traffic within the Land. 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 and pedestrians.
- 13.3 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 and 3-30 appears to create a high probability that a satisfactory solution for vehicular movements to, from and within the Land shall not be preserved, for the reasons set out in more detail below.
- 13.4 Our clients consider that the positioning and alignment of the proposed project will severely interfere with our clients' businesses.
- 13.5 Our clients have instructed a consultant to review the proposals provided by the Applicant. A copy of the technical report on the scheme as issued to the Applicant in draft form in August 2018 is at **Appendix 1**.
- 13.6 Subsequently, the Applicant has provided a proposal for an alternative access arrangement which has also been reviewed by our clients' technical consultant and their report on this is at **Appendix 2**. The key conclusions from these reports are highlighted below:

13.7 The submitted scheme

- 13.7.1 The scheme will directly affect the Land by the removal of existing entrance gates, the electricity transformer located immediately west of the entrance gates, permanent loss of part of the access road area and vehicle turning space at the west end of the existing buildings on the Land, easement rights over parts of the west of the Land, complete removal of separate access route for the Development Land and a reduction in the area available for the development of the Development Land.
- 13.7.2 The scheme restricts HGV manoeuvres to turn left on entering the Land to pass to the west end of the existing building, restriction of HGV manoeuvres to turn right to leave the Land from the west end of the existing building, restriction of access to the weighbridge located to the west of the existing building, potential to require HGVs to use an access route to the south of the existing building putting them in potential conflict with cars and pedestrians and removing a direct vehicular access to the Development Land.
- 13.7.3 Insufficient and inadequate information has been provided to demonstrate that the submitted scheme would allow satisfactory access to, from and within the Land for existing operations and the development of the Development Land.
- 13.7.4 The possibility of the existing business operations and development of the Development Land sharing the same point of access gives rise to concerns of increased traffic using a single point of access and increased conflict of HGVs, car traffic and pedestrians in this area. The submitted scheme shows a lack of consideration as to how open and direct access arrangements for the proposed development of the Development Land are required whilst securing secure fencing and gates for the existing business operations.

13.8 The alternative access arrangement proposals

- 13.8.1 This alternative arrangement continues to require the compulsory acquisition of part of the Land and the horizontal and vertical alignments from the submitted scheme have not changed.
- 13.8.2 These proposals include an alternative HGV access into the Land located further to the north of the currently proposed access and through a different span of the bridge structure.
- 13.8.3 This different span provides for increased headroom for vehicle access when compared to the span proposed to be used for the sole underpass to the Land proposed with the submitted scheme (7.01m compared to 5.3m).
- 13.8.4 This alternative arrangement does not provide a new and separate access to the Development Land.

13.8.5 Whilst this alternative arrangement is designed to improve headroom clearance for HGVs, specialist fork lift trucks and container loaders and better accommodate low-loader swept path for routes in to and out of the existing warehouse and factory on the Land and for separate access to be provided for HGVs and car traffic to the Land, it remains unsuitable for the following reasons:

13.8.5.1 The drawings setting out this alternative arrangement provide a swept path analysis for a low-loader vehicle entering the warehouse and factory part of the Land at two access points but this is based on an 18m long low-loader with trailer steering. This is not the type of vehicle used by our clients' businesses and a swept path analysis using a low-loader without trailer steering is required. Without such information the alternative arrangement proposals are technically flawed.

13.8.5.2 The Applicant has not provided a swept path analysis for usual HGVs or for vehicles entering or leaving the Land when a HGV is being unloaded at the "goods inward" door to the west of the existing buildings. However, it appears from drawing 1069948-SCC-HGN-LL-DR-KK-0008 that such a vehicle could only enter or leave the Land when another vehicle is already at the "goods inward" door.

13.8.5.3 The current layout of the Land does allow for one HGV to pass another HGV parked at the "goods inward" door. The alternative arrangement would only allow use of the new proposed additional northern access when the "goods inward" door was not in use. The Applicant has not properly considered the current operational use of the Land.

13.8.5.4 In light of the above, the alternative arrangement would actually provide a worse situation rather than an improvement of the access to and from and within the Land. The Applicant's alternative arrangement will also mean that the weighbridge on the Land is no longer on the principle access/egress route for HGVs and such vehicles would either need to perform a new forward-then-reverse manoeuvre or make use of the originally proposed access set out in the submitted scheme (subject to the concerns with that approach summarised above).

13.8.5.5 The alternative arrangement, like the access proposals submitted with the scheme, does nothing to demonstrate access arrangements during the construction period of the proposed project. The technical consultant has provided a sketch of a further alternative arrangement to demonstrate an example of an arrangement which may deal with this particular issue.

14 Our clients do not only have concerns about access to, from and within the Land. Our clients remain concerned about ensuring that the security and integrity of the Land is maintained both during the construction of the proposed project and during its

operational phase. As set out in our clients' relevant representations, our clients are not satisfied that suitable consideration has been given to future gating and fencing arrangements for the Land.

- 15 There is no evidence that our clients' businesses will not be severely and irreparably affected by the construction and on-going operation of the proposed project (to the point of extinguishment of the businesses or the need for complete and permanent relocation) or that the Applicant has now suitably investigated alternative access solutions.
- 16 The Applicant does not appear to fully understand the potential impacts on our clients' businesses. This is reinforced by the nature of the alternative access proposal that has been provided and the conclusion in Table 16-10 of the Environmental Statement it submitted that the proposed project will *"not adversely affect the viability of the business and hence will not affect employment"*.
- 17 Our clients simply have not been provided with any realistic solutions to ensure that constant access to and movements within the Land for the operation of the existing businesses will be maintained both during the construction and operational phases of the proposed project.
- 18 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 these this shall be realistic or technically achievable, certainly within the limits of deviation of the submitted scheme.

19 Acquisition of rights over the Land

- 19.1 In addition, the proposed area (Plot 3-29) on which rights are proposed to be acquired permanently represents a substantial part of the operational area of the Land which for the reasons set out above is crucial for the continued operation of our clients' businesses.
- 19.2 We note that Table 15-4 of the Environmental Statement submitted by the Applicant envisages a 1,562 sqm easements strip which would restrict the forms of development which could be undertaken within it. We have not seen any further information about the nature of the proposed restriction on development in this strip.
- 19.3 The provision in Article 25 of the draft DCO regarding the acquisition of rights is extremely broad and given the importance of this area of Land to the operation of our clients' businesses our clients are particularly concerned about this. Our clients would welcome further information about the precise nature of the rights that the Applicant is seeking to acquire over Plot 3-29.
- 19.4 As will be appreciated, the proposed DCO may only authorise compulsory acquisition if the land in question is required for the development to which the DCO relates, or is required to facilitate, or is incidental to, the proposed project (or is replacement land given in exchange) and there is a compelling case in the public interest for the compulsory acquisition. Given the information that our clients have received to date, these tests are not met for the whole extent of Plot 3-29.

20 Our clients' rights to access the Land during the construction and operational phases

- 20.1 The draft DCO does not provide details on how any permanent rights for our clients to access the Land shall be secured in perpetuity (as opposed to physically providing a new form of access, which our clients have concerns about in any event as set out above) 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.
- 20.2 We acknowledge that Article 8 of the draft DCO envisages any "highway" that is to be constructed under the Order to be maintained by the highway authority from completion and we would welcome clarity on whether any of the proposed access arrangements to the Land would be both dedicated and adopted by the highway authority as public rights of way.
- 20.3 Whilst our clients have concerns regarding the proposed access arrangements for the Land, even if these concerns can be overcome our clients need to be assured that the provisions of the draft DCO require new access rights to be given over such access arrangements both during the construction and operational phases of the proposed project. This does not only relate to the land that is proposed to be compulsorily acquired but also any other land that is required to enable our clients' to utilise access arrangements, provided that suitable arrangements can be provided.

Impact on our clients' development aspirations

21 Background

- 21.1 The area within the Land identified as Plot 3-56 on the Land Plan Sheet 3 of 5 (1069948-WSP-LSI-LL-DR-GI-0004) has been identified for temporary acquisition ("**Development Land**").
- 21.2 We note that there is no explanation given in the draft DCO as to why the Development Land has been so identified. However, we now appreciate that Table 15-3 in the Environmental Statement submitted by the Applicant indicates that when referring to the Development Land the "*remainder of the land is included within the Order limits for temporary use during the construction phase by Motorlings, which borders the property to the south*". We also note that Table 15-4 of the Environmental Statement states that the "*undeveloped part of the site 4,863m² is temporarily required for the Scheme. This would delay its potential redevelopment until the land is vacated by the Applicant and returned to the landowner*" and that "*land immediately north of Motorlings (in the ownership of Nexen) will be made available for additional display space*".
- 21.3 Save for the high level information highlighted above our clients have no information as to the precise nature, extent or timeframe for such a temporary use of its Development Land. For example, there is no information about any works that may be required to the Development Land to facilitate this proposed temporary use and the state that this Development Land shall be

returned to our clients. We are also unaware of whether this arrangement would be acceptable to Motorlings.

- 21.4 A right of access (with or without vehicles) to the Land (including the Development Land) along an already constructed access road (shown as part of Plots 3-57 and 3-32 on the Land Plan Sheet 3 of 5 (1069948-WSP-LSI-LL-DR-GI-0004)) which immediately adjoins the south of the Land and is within the freehold ownership of PFK Ling Limited was reserved in the transfer of the Motorlings site to PFK Ling Limited dated 18 September 2003. A copy of this 2003 transfer can be provided on request.
- 21.5 The ability for our clients to utilise this right of access will be extinguished by the construction and operation of the proposed project (and the operation of Article 27 of the draft DCO). 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 the Development Land using this route.
- 21.6 Our clients have long held development aspirations for the Development Land. Indeed planning permission was secured (ref: DC/06/1331/OUT) on 1 March 2007 for the redevelopment of the Development Land for the *“construction of 3 office blocks to provide 32 units and associated parking”* (**“2007 Permission”**). Given the market conditions at the time the 2007 Permission was not implemented
- 21.7 However, our clients’ firm intention to redevelop the Development Land remains and they reserve their right to submit a new planning application or an application for a certificate of appropriate alternative development in due course.
- 21.8 Our clients have received approaches from companies looking for commercial space, ranging from those involved in the motor trade to more recent discussions in 2018 with a Korean company with a requirement for research and development and European marketing offices. This entity proposed entering into a joint venture to manufacture products and funding to expand the existing factory on the Land which would have resulted in the employment of 35 – 50 additional employees. Our clients were at the point of instructing architects to draw up a scheme for submission but negotiations have not progressed due to uncertainty caused by the proposed scheme. Our clients can provide evidence to this effect if required. However, at present, these negotiations are not progressing given the uncertainty created by the proposed scheme.
- 21.9 Our clients’ advisor John Jones of Colliers International discussed the development of the Development Land with Sam Hubbard, Planning Officer – Policy at Waveney District Council on 4 January 2019. We understand that the officer said that he saw no reason why a planning permission for the Development Land would not be granted as it fits within planning policy for the area i.e. employment related uses such as B1, B2 and B8 and benefits from an independent access from the access road on the Motorlings site referred to above.
- 21.10 The Development Land lies within the Great Yarmouth and Lowestoft Enterprise Zone. An Enterprise Zone of 2012 covered Riverside Road and a

later extension in 2015 comprises the Development Land and the site on the opposite side of Riverside Road surrounding the Registry Office.

21.11 We also note that Policy SSP3 of the Lowestoft Lake Lothing & Outer Harbour Area Action Plan supports the development of the Land (and other areas) for employment/mixed use development.

21.12 Our clients have real concerns that the proposed temporary acquisition of the Development Land shall stifle these development aspirations and the construction of the proposed project shall impact on these proposals in the future.

22 Access and use of the Development Land during the construction phase of the proposed project

22.1 The same concerns that are raised above in relation to the effect of the construction period regarding the continuity of access are applicable to the access to the Development Land during the construction phase.

22.2 However, given that it is anticipated that the Development Land is to be temporarily acquired by the Applicant to provide to Motorlings during the construction phase, our clients' development aspirations for the Land will be wholly frustrated during the whole period of such temporary acquisition.

22.3 Our clients are dismayed that it appears that the Applicant is considering the temporary relocation of all or part of the Motorlings operation as a result of the proposed scheme but have not included any provision for the relocation of our clients' businesses or discussed this with our clients.

22.4 There remains a lack of detail from the Applicant as to why the Development Land is proposed to be temporarily acquired, the 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.

22.5 In light of the proposed temporary acquisition of the Development Land issues that our clients would otherwise have concerns about during the construction phase (such as the stopping up and physical prevention from using the private means of access to Riverside Road through land owned by PFK Ling Limited which was reserved in the transfer of the Motorlings land or the extent of the Development Land under Plot 3-29 where the permanent acquisition of rights is sought) are not explored further here.

23 Access and use of the Development Land during the operational phase of the proposed project

23.1 Our clients have a real concern that the Development Land shall be effectively severed due to the gating and access requirements of our clients' existing businesses – notwithstanding our concerns (summarised above) as to whether these may be suitably accommodated in light of the proposed project.

- 23.2 Indeed, our clients have concerns that any joint access arrangements between our clients' existing business operations and the 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.
- 23.3 The technical reports at **Appendices 1 and 2** confirm that the proposed access arrangements to the Development Land during the operational phase of the proposed project cause the following issues:
- 23.3.1 An increase in traffic levels using a single point of access. As set out above, at present the Land has reserved the right to access Riverside Road through a separate means of access over land owned by PFK Ling Limited.
- 23.3.2 There is an increased risk of conflict between HGVs, car traffic and pedestrians. It is acknowledged that conflicts with HGVs may be minimised if an alternative access for HGVs to the north of the underpass access set out in the submitted scheme was delivered. However, for the reasons set out above it is not considered that the alternative access that has been proposed by the Applicant to date is satisfactory.
- 23.3.3 There has been no consideration from the Applicant to the matter of how to accommodate open and direct access arrangements for our clients' proposed development of the Development Land whilst maintaining secure fencing and gates for the existing warehousing and factory on the Land.
- 23.4 As a scheme which is at least in part designed to promote the economic development of Lowestoft our clients are dismayed at the failure of the proposed project to facilitate the redevelopment of the Development Land.
- 23.5 As alluded to above, Land Plan 1069948-WSP-LSI-LL-DR-GI-0004 shows Plot 3-29 as an area on which the Applicant proposes to compulsorily acquire rights. Plot 3-29 represents a not insignificant area of the Development Land and it is our clients' position that this will undoubtedly reduce the extent and scope of the development that our clients' would be able to accommodate on the Development Land. As set out above, the precise nature of what rights are required on this area is unknown and the powers that are sought by Article 25 of the draft DCO are worryingly broad. Our comments above in relation to the legal tests for compulsory acquisition of this area apply equally here.
- 23.6 As highlighted above, if the alignment and route of the proposed project are not altered our clients consider that the only suitable access arrangement for the Development Land is the creation of a new access road to the east of the current Motorlings building.

Impact of the construction of a new mooring on Plot 3-52

- 24 Our clients note that the land identified as Plot 3-52 on the Land Plan Sheet 3 of 5 (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.
- 25 As set out in our clients' relevant representations our clients have previously leased moorings along the edge of the Land and are concerned that this will not be practically possible during and following the construction of this new mooring.
- 26 Furthermore, our clients do not consider that the information submitted provides them with comfort regarding their ability to access the Land from Lake Lothing during and following the construction of this mooring. Our clients have received a number of enquiries from large shipping companies in relation to the possibility of the use of the quayside on the Land to embark/disembark goods and equipment. Our clients are concerned that their ability to take up such interest or offer such availability to their clients.

Howes Percival LLP

8 January 2019

Appendix 1

Appendix 2



**NEXEN
RIVERSIDE ROAD
LOWESTOFT**

**LAKE LOTHING THIRD
CROSSING
HIGHWAY ENGINEERING
APPRAISAL**

**IMPACT ON ACCESS AND
OPERATIONS**

SEPTEMBER 2018

the journey is the reward



NEXEN
RIVERSIDE ROAD, LOWESTOFT

LAKE LOTHING THIRD CROSSING
HIGHWAY ENGINEERING APPRAISAL

IMPACT ON ACCESS AND OPERATIONS

SEPTEMBER 2018

Project Code:	NEX-LOW.1
Prepared by:	TPM
Position:	Director
Issue Date:	September 2018
Status:	Issue as Final

**IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS**

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Appendix A

Suffolk County Council Drawings

Appendix B

LLTC Highway Geometry check to DMRB, TD9

Appendix C

Nexen Development Proposals

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Mayer Brown Drawings

Alternative Alignment Proposal for LLTC Southern Approach

Alternative Access for Nexen and Lings from Waveney Drive

IMPACT OF LAKE LOTHING THIRD CROSSING ON NEXEN ACCESS AND OPERATIONS

1 Introduction

- 1.1 This report provides an assessment of the highway and access impact of the Suffolk County Council (SCC) proposals for the Lake Lothing Third Crossing (LLTC) on the property, development proposals and operations of Nexen Lift Trucks ('Nexen') and associated companies.
- 1.2 The geometric design of LLTC is provided on drawings and other documents prepared for SCC.
- 1.3 The site layout and constraints are as provided and described by the management of Nexen. These factors are also as observed on site by the author.
- 1.4 The operations of Nexen and of associated companies based at the property are as described to the author by the management representatives of Nexen.
- 1.5 This report is prepared, in accordance with a brief agreed with SCC, to assess the impact upon the Nexen property of the published scheme proposal only.

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2 Description of Lake Lothing Third Crossing

- 2.1 Suffolk County Council (SCC) is proposing to construct a new vehicular crossing over Lake Lothing in the centre of Lowestoft; the Lake Lothing Third Crossing (LLTC).
- 2.2 The new crossing as presented is a multi-span single carriageway bridge, from Peto Way on the north side of Lake Lothing to Waveney Drive on the south side. The section over Lake Lothing itself contains a bascule bridge, but set with a 12m clearance above high tide level to minimise the necessity for it to open for passage of ships.
- 2.3 The preliminary design of horizontal and vertical geometry is illustrated on a SCC drawing, 1069948-WSP-HML-LL-DR-CH-0101, rev P02 (*see Appendix A*).
- 2.4 The approach and bridge structure on the south side of Lake Lothing closely follow the plan alignment of Riverside Road. This section of the bridge has a direct impact upon the Nexen property which has frontage on to Riverside Road.
- 2.5 To achieve the headroom required by the bascule bridge, the southern approach will start rising from the junction with Waveney Drive. The vertical profile will be around 11.25m above existing ground at the point where it crosses the southern bank of Lake Lothing. The approach has a maximum gradient of 5%.
- 2.6 The scheme as presented will take up land from the Nexen property, including the site access gates and entrance, and will have impact on the movement of vehicles in to, around and out of the property.
- 2.7 The scheme as presented removes access to the southern parcel of the Nexen land holding, which is identified for future development.
- 2.8 The scheme proposal includes for a new access route to the Nexen property through one of the open spans of the bridge structure. A standard highway headroom for vehicles of 5.3m is identified.
- 2.9 It is noted that the scheme proposals do not provide for any access proposal for the southern parcel of the Nexen land holding.
- 2.10 SCC has provided a plan drawing 1069948-WSP-HAC-LL-DR-CH-0003, rev P05, to illustrate rights of way and accesses required by the LLTC scheme. This drawing shows that a new private means of access is to be created along the east side of the LLTC bridge, running from Waveney Drive up to the Nexen property. The drawing indicates that this access is required for maintenance of the structure. The access is drawn as 3m wide and at 2m offset from the parapet edge of the bridge; i.e. the access takes up a 5m strip on the east side of LLTC including land from the Nexen holding.

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3 Description of Nexen Property and Operations

- 3.1 The Nexen land holding is located immediately to the east of Riverside Road. It is bounded to the north by Lake Lothing, to the east by Kirkley Ham (an inlet of Lake Lothing) and to the south by property occupied by Lings Motor Group.
- 3.2 The land holding is formed of two distinct parcels with different uses.
- 3.3 The north parcel, of 2.50 acres, is occupied principally by the factory, offices, warehousing and yards; used for the manufacturing, assembly and warehousing activities of Nexen Lift Trucks and associated companies.
- 3.4 This Nexen property provides a base for the HiTech GP Formula 3 motor racing team. This company uses articulated vehicles at the property for the transport of their cars, support teams and equipment. The company occupies space at the east end of the Nexen building.
- 3.5 The southern parcel (Riverside Business Park), of 1.27 acres, is currently undeveloped but is designated for and has Planning Consent / Permitted Development Rights for development as office space. The planning of the development is at an advanced stage. Drawings of the development proposals are provided at *Appendix C*.

Northern Parcel – Nexen Factory, Warehouse and Offices

- 3.6 The current access to the northern parcel property is through a gated entrance on a bellmouth junction with Riverside Road. This is a wide entrance, c 8m, and can accommodate all sizes of road legal vehicles, including articulated hgvs and low-loaders.
- 3.7 The factory / warehouse has three principal access doors; one each on the west, north and east sides of the building. There are vehicle turning areas adjacent to each of these, on the north and east sides of the building. All are used for the loading and/or unloading of articulated lorries.
- 3.8 In general terms, the access on at the west end of the building provides for goods and materials being delivered at the start of a production line for the manufacture and assembly of fork lift trucks. The entrance on the north is at the end of the production line. The entrance at the east end provides access for warehousing.
- 3.9 There is a weighbridge located at the west end of the Nexen building.
- 3.10 The operation of the site requires that hgvs turn left immediately on entering from Riverside Road and pass the west end of the building. This arrangement allows use of the weighbridge and directs hgvs to the service access points and turning areas on the west, north and east sides.
- 3.11 Hgvs do not pass the south side of the building, where there is a car park and main access to the building for personnel and for the offices. This ensures that hgv movements do not conflict with car traffic.
- 3.12 Hgvs leaving the site will turn around and follow the route out around the north and west sides of the building. Exit on to Riverside Road is made by a right turn through gated access. This route allows exiting vehicles to make use of the weighbridge and to avoid conflict with car traffic on the property.

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Southern Parcel – Nexen Development Site

- 3.13 Access to the development area of the southern parcel of the property is currently made via an access road located immediately to the south of the parcel and which runs west-east from Riverside Road. This access is shared with Lings Motor Group who own property on the south of the access road.
- 3.14 The development proposals for the southern parcel illustrate that there would be three direct access points on to the west-east access road; in turn providing a direct and easy route to Riverside Road.
- 3.15 The drawings of the LLTC indicate that access to the southern parcel will be completely severed. There are no new access proposals indicated for the development site.

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4 Assessment of Geometric Highway Design of LLTC

4.1 A detailed assessment of the horizontal (plan) and vertical geometry of the SCC published scheme of the LLTC is provided at *Appendix B*. This assessment is based upon the information provided on SCC drawing, 1069948-WSP-HML-LL-DR-CH-0101, rev P02 (*see Appendix A*).

4.2 LLTC is shown as connecting with the existing road network at roundabout junctions at both northern and southern ends.

4.3 *Overall the geometry of the LLTC is found to be consistent with a 30mph speed limit / 60kph design speed; the geometric standards as set by The Design Manual for Roads and Bridges (DMRB), Vol 6, TD9 – Highway Link Design.*

North Side Approach

4.4 The LLTC bridge approach from the north is noted to have three steps of relaxation below desirable minimum standards for horizontal radius and superelevation. This is acceptable in accordance with TD9.

4.5 The approach from the north has a vertical profile with a 6% maximum gradient. This is at the normal maximum limit for a single carriageway road.

4.6 Vertical curves are at desirable minimum curvature for crests and absolute minimum for sags. This arrangement is in accordance with TD9 standards and guidance.

4.7 The approach from the north has a curve of 135m radius. TD9 provides that for curves of 90m to 150m the carriageway should be widened by 0.3m per lane. It is noted that this has been missed in the road alignment and geometry as drawn and presented. If not corrected this would represent a Departure from the TD9 Standard.

4.8 Taking account of 4.3 to 4.5 above, it is considered that the design of the north side approach is at the limit of geometric standards.

South Side Approach

4.9 The LLTC bridge approach from the south is noted to have two steps of relaxation below desirable minimum standards for horizontal radius and superelevation. This is acceptable in accordance with TD9.

4.10 The approach from the south has a vertical profile with a 5% maximum gradient.

4.11 Vertical curves are at desirable minimum curvature for crests and absolute minimum for sags. This arrangement is in accordance with TD9 standards and guidance.

4.12 Taking account of 4.8 to 4.10 above, it is considered that the design of the south side approach is within geometric standards.

Northern and Southern Roundabouts

4.13 The alignment geometry of the northern and southern roundabouts is provided on the drawings in plan only (horizontal geometry).

4.14 The plan geometry of the roundabouts, so far as it can be checked, is found to be generally acceptable and in accordance with design guidance of DMRB.

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- 4.15 The 'deflection' path of traffic entering the northern roundabout from the road of the LLTC requires more detailed checking. It is apparent that an entry path radius of greater than 100m could be achieved. This would require some re-design of the plan layout to correct.
- 4.16 It is noted that the northern roundabout sits some 3 metres above existing ground levels. This level difference would have to be accommodated in approximately 60m length of connecting roads to Peto Way and Denmark Road. It is not shown that this level difference can be achieved with suitable and appropriate gradients and vertical curves.
- 4.17 It is noted that SCC have not provided preliminary roundabout capacity checks linked to the design geometry; i.e. there are no Arcady / Roads 9 analyses. This analysis is required to conform that the roundabout geometry will provide the required traffic capacity.
- 4.18 *Items 4.16 and 4.17 above raise some uncertainty that the LLTC highway geometry can be provided as currently presented. Unless these geometric constraints are satisfied there will be some doubt that the LLTC can be delivered as presented.*

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5 Impact of LLTC on Nexen Site Access and Operation

5.1 The LLTC scheme as presented will have the following direct effects on the Nexen property:-

- Removal of existing entrance gates.
- Removal of electricity transformer located immediately to the west of the entrance gates.
- Permanent loss of part of access road and vehicle turning space at the west end of the property.
- Easement rights over other land at the west end of the property for access and maintenance of the LLTC bridge structure.
- Complete removal of access route to the southern development land parcel.
- Reduced area available for the development of the southern parcel.

5.2 The LLTC scheme as presented will have the following direct impacts on the vehicle movements at the Nexen property: -

- Restriction of hgv manoeuvre to turn left on entering the site to pass the west end of the building.
- Restriction of hgv manoeuvre to turn right to leave the site from west end of the building.
- Restriction of access to the weighbridge located to west of the building.
- The above bullet points may require that hgvs have to access and egress the factory and warehousing areas by passing along the south side of the buildings, thereby introducing conflict with car traffic and pedestrians.
- No direct vehicle access to the southern development land parcel.

5.3 The precise land to be taken up by the LLTC proposals has not been clearly identified by SCC on their drawings. In particular, the intentions for securing the private means of access alongside the bridge (see para 2.10 above) are not known. On the basis that this private means of access is required for maintenance of the LLTC structure and is to be kept free of buildings, gates and fences for Nexen, then it would require that any new gate or entrance features for the Nexen property will be at least 5m from the parapet edge of the bridge.

5.4 SCC has not provided adequate or appropriate vehicle tracking analysis to illustrate how the Nexen site may continue to operate with the new access arrangement as shown on their drawing 1069948-WSP-HML-LL-DR-CH-0101, rev P02 (*see Appendix A*).

5.5 SCC has previously provided a drawing to Nexen of a swept path analysis for hgv access; drawing 1069948-MOU-HGN-LL-LR-SK-CH-0015, rev P01-01 (*see Appendix A*). However, this drawing illustrates the vehicle tracking of a 10m long rigid vehicle only and assumes that vehicles will follow a clockwise circuit of the complete property.

5.6 It is known that Nexen and other occupiers of the property regularly use 16m articulated vehicles and low-loader transporters. It is known that hgvs movements on the south side of the building are restricted to avoid conflict with car traffic and the access route to the offices within the building.

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- 5.7 It is noted that drawing 1069948-MOU-HGN-LL-LR-SK-CH-0015, rev P01-01 has no indication of the location or dimension of replacement entrance gates or any representation of the land required for the private means of access to be secured for future bridge maintenance.
- 5.8 Taking account of 5.4 to 5.6 above, SCC has provided no certainty or guarantee that Nexen can continue to operate their manufacturing, assembly and warehousing operations without significant and substantial change to the site layout and facilities.
- 5.9 The following operational arrangements are at risk from the LLTC proposals: _
- Restricted hgv access to the west end of the building will affect the delivery of materials and plant to the start of the production line
 - Restricted hgv access to the west end of the building will limit use of the weighbridge
 - Alternative routing of hgv's to the south of the building will place hgv's at conflict with car traffic and pedestrians using the building, with associated safety risks.
- 5.10 It is recorded that Nexen house and operate a number of large fork lift trucks and container loaders at their site. Of particular note are the following vehicles:-
- | | | | |
|----|--|---|---------|
| a. | Yale GDP160 fork truck | | |
| | Closed height on the ground | - | 4.865m. |
| | Closed height on a step frame low loader | - | 5.465m. |
| b. | SMV SL37 top loader container handler | | |
| | Closed height on the ground | - | 6.200m. |
- These vehicles are regularly transported off site for use at other locations.
- 5.11 As stated at 2.8 above, the LLTC proposals allow for a new access to Nexen through a bridge span with a standard headroom of 5.3m. It is clear that this headroom provision will be insufficient to accommodate ready transportation of the vehicles described at 5.8 above and has not been considered in the LLTC proposals.
- 5.12 It is recorded that the SMV SL37 container handler is moved off site around 15 times per year. To accommodate this with the LLTC proposed scheme in place will require the vehicle to be fully de-masted. This is not currently required.
- 5.13 The cost of de-masting is recorded by Nexen at around £2.5k each time. Re-assembly cost is similar. The LLTC would have the impact of discontinuing the hired use revenue of the SMV SL37 vehicle. Alternatively, the cost to Nexen of the continued operational or hired would be significantly increased.
- 5.14 As noted at 3.7 and 3.8 above, the southern parcel of the Nexen site has access arrangements on to the west-east access road that lies further to the south and thereby has a route directly on to Riverside Road. The LLTC removes the access route to the southern parcel and provides no alternative means of access.
- 5.15 It might be inferred from the LLTC drawings that the southern parcel will gain access from the same point as the northern parcel. This is arrangements raises the following observations and questions:-

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1. Increase traffic use of a single point of access.
2. Increased conflict of hgvs / car traffic / pedestrians (bearing in mind also the possible necessary re-routing of hgvs to the south of the existing Nexen factory / warehouse / offices).
3. No consideration has been given to the matter of how to accommodate open and direct access arrangements for the proposed office development, whilst maintaining secure fencing and gates for the factory/warehouse site.

5.16 With reference to paragraph 5.3 above, the precise land to be taken up by the LLTC proposals has not been clearly identified by SCC on their drawings. In particular, the intentions for securing the private means of access alongside the bridge (see para 2.10 above) are not known. On the basis that this private means of access is required for maintenance of the LLTC structure and is to be kept free of buildings, gates, fences or other development features, then it would require that the limit of the proposed new development would have to be set at least 5m from the parapet edge of the bridge.

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6. Suggested Alternative Scheme Proposals for LLTC

6.1 The following items are presented as possible amendments or additions to the LLTC alignment and proposals, in order to reduce or remove the impact of the scheme on the operations at the Nexen property.

6.2 Re-alignment of LLTC southern approach

6.2.1 There has been no information provided by SCC to indicate whether options have been tested for the southern approach alignment to reduce the impact on the Nexen property.

6.2.2 An alternative alignment for the southern approach is presented as sketch MBSK 180713, in Appendix D. This alignment maintains the LLTC to the DMRB design standards, albeit with a reduced centreline radius (180m R) in the vicinity of the Nexen frontage. The centreline of the LLTC alignment is thereby moved around 8 metres to the west, and away from, the existing Nexen access gate.

6.2.3 The alternative alignment significantly reduces the impact on Nexen. It increases impact on the neighbouring office property, which houses SCC's Registrar's Office.

6.2.4 The alternative alignment would have the following benefits and reduced impacts on the Nexen property :-

- The existing property gate, fences and security arrangements can be retained in place and as existing.
- The circulation of hgvs around the site can be maintained exactly as existing; i.e. hgvs pass around to the west and north of the buildings. Reduced conflict with car traffic and pedestrians is maintained.
- The weighbridge can be retained in its current position and full use maintained.
- The forklift production line and other operations at the property are maintained without disruption or alteration.

6.2.5 The alternative alignment would require removal of the SCC Registrar's Office building situated on the west of the LLTC bridge. The cost of this option should be considered in light of the significant saving in costs due to the reduced reduction in disruption to Nexen. It is considered that the value of the unchanged and continued operational use of the Nexen premises would outweigh the value or cost of keeping the Registrar's Office building.

6.3 New Access to Nexen Southern Parcel from Waveney Drive (alongside Lings and Kirkley Ham)

6.3.1 There is no information provided by SCC to describe or illustrate how access will be maintained to the southern parcel of the Nexen land holding. In addition, the drawings provided by SCC for LLTC give only outline indication of the new means of access to be afforded to the adjacent property occupied by Lings Motors.

6.3.2 A proposal is presented in sketch MBSK 180720, see Appendix D, for a new access road to serve the Nexen development area and the Lings property. The proposal is for an access road to be created running south-north on the east side of the Lings property and the Nexen development area and connecting with Waveney Drive with a left-in / left out junction.

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- 6.3.3 This new access could be created within the Lings property and on a strip of land between Lings and the quay wall of Kirkley Ham. However, to preserve the current operational use enjoyed by Lings of their site, the new road alignment is drawn with some encroachment into Kirkley Ham. A new quay wall would be required.
- 6.3.4 The new road would connect with the existing west-east road that separates and provides access to the Nexen development area and the Lings property; thereby maintaining and providing access to both land parcels.
- 6.3.5 In addition the new road can be extended further to the north to connect directly with the Nexen northern parcel. This arrangement would provide access sufficient to allow the transportation on and off site of the large fork lift and container loader vehicles, as described at paragraphs 5.10 to 5.13 above.
- 6.4 *It is intended that the alternative access and road layout arrangements as described at 6.2 and 6.3 are both required in order to preserve the operational requirements and development schemes of the Nexen properties.*

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7 Summary

- 7.1 The following paragraphs describe the key items highlighted by this appraisal of the impact of the LLTC on the property and operations of Nexen.
- 7.2 The LLTC road geometry as presented is found to be generally within the design standards for a 30mph road in accordance with the 'Design Manual for Roads and Bridges – TD9, Highway Link Design'. It is noted that some elements of the design geometry are at the limit of acceptable design in terms of 'relaxation' from standard.
- 7.3 The traffic capacity of the roundabout junctions at the northern and southern ends of the LLTC is not proven as being satisfactory. Traffic flows and capacity analyses (Arcady / Roads 9) has not been provided by SCC.
- 7.4 The vertical geometry of the northern roundabout junction has not been proven. The roundabout is shown on SCC drawings to sit some 3m above existing ground levels. There is no satisfactory vertical design geometry presented for the roundabout arms which connect to existing roads (ground level).
- 7.5 SCC has not undertaken appropriate or adequate assessment of the vehicular access or movement arrangements for the existing Nexen factory / warehouse premises. There has been no consideration of the actual types of vehicles that are in regular use at the property. There has been no consideration of the operational use of the site; e.g. access doors and their use, vehicle circulation and routeing, vehicle turning, weighbridge location, separation of hgv's and car traffic.
- 7.6 The full impact of the LLTC structure and maintenance access have not been adequately assessed or presented. The SCC drawing which shows rights of way and access suggests a far greater impact in terms of land take from the Nexen parcels than might be inferred from the LLTC road and bridge scheme layout plans.
- 7.7 The LLTC proposals provide only a restricted new access proposal for the Nexen northern parcel. There is no new access arrangement shown for the southern parcel development area.
- 7.8 The new access proposed to the northern parcel has a headroom limited to that of 'standard' height vehicles. This does not accommodate movement on/off site of the large forklift and container loader vehicles that Nexen use.
- 7.9 A proposal is presented for a re-alignment of LLTC which removes any requirement to take up land from Nexen. This arrangement would allow the operational use of the Nexen factory and warehouse premises to be maintained as existing (hgv circulation, weighbridge use, separation of hgv and car traffic, access to factory entrance doors).
- 7.10 The LLTC re-alignment sets the continued operational use of the Nexen factory and warehouse against removal of the SCC Registrar's Office. It is considered that the value of the unchanged and continued operational use of the Nexen premises would outweigh the value or cost of keeping the Registrar's Office building.
- 7.11 The LLTC severs the development area of the Nexen southern parcel from the highway network and provides no alternative means of access.

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- 7.12 A proposal is presented for a new access road to be provided, running north from Waveney Drive, to give access to the development area of the Nexen southern parcel and to the adjacent Lings property. This road should be provided in order to preserve the development potential of the Nexen land.
- 7.13 Overall, it is considered that the LLTC proposals as presented will have a severe and damaging impact on the operational use of the existing Nexen factory and warehouse premises on their northern parcel. Insufficient and inadequate consideration has been given to the way that the site currently operates and of the vehicles that enter and are used at the site. The land to be taken and the alternative means of access presented do not allow the site to continue to be operated as Nexen currently so do.
- 7.14 The LLTC proposals as presented will sever the development area of the Nexen southern parcel from the road network. No alternative means of access is presented as being provided. A new means of access is required for the development of the parcel to be undertaken as currently envisaged.

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APPENDIX A

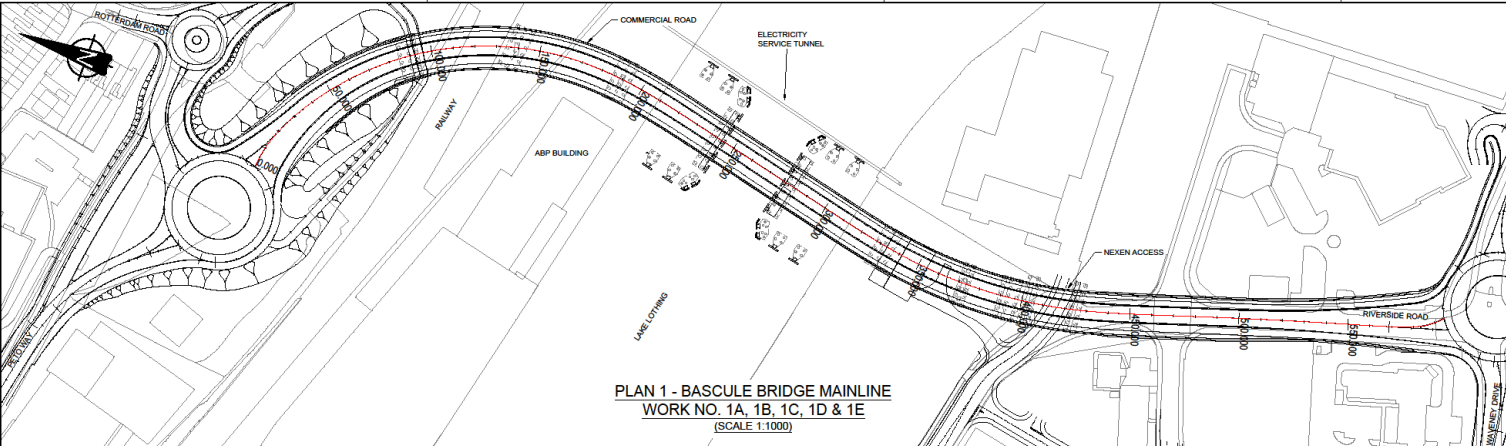
SUFFOLK COUNTY COUNCIL DRAWINGS

- 1] ENGINEERING SECTION DRAWINGS, ELEVATIONS AND PLANS; MAINLINE;
REGULATIONS 5(2)(o), 5(2)(p) & 6(2)(a) SHEET 1 OF 1
Drg No. 1069948-WSP-HML-LL-DR-CH-0101, rev P02

- 2] RIGHTS OF WAY & ACCESS PLANS; REGULATIONS 5(2)(k) & 5(2)(o) SHEET 2 of 2
Drg No. 1069948-WSP-HAC-LL-DR-CH-003, rev P05

- 3] SWEPT PATH ANALYSIS FOR ACCESS FOR NEXEN
Drg No. 1069948-MOU-HGN-LL_LR-SK-CH-0015, rev P01.01

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KEY PLAN

KEY

NOTES

1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
2. THESE ENGINEERING SECTION DRAWINGS, ELEVATIONS AND PLANS SHOULD BE READ IN CONJUNCTION WITH THE KEY PLAN AND ALONGSIDE OTHER PLANS AND DOCUMENTS IN THE DEVELOPMENT CONSENT ORDER APPLICATION, IN PARTICULAR THE WORKS PLANS AND SCHEDULE 1 (AUTHORISED DEVELOPMENT) TO THE DEVELOPMENT CONSENT ORDER.
3. WORK NO. REFERENCES ARE DETAILED IN SCHEDULE 1 (AUTHORISED DEVELOPMENT) TO THE DEVELOPMENT CONSENT ORDER.
4. THESE ENGINEERING SECTION DRAWINGS, ELEVATIONS AND PLANS WILL BE SUBJECT TO DETAILED DESIGN DEVELOPMENT. ANY CHANGES WILL BE LIMITED TO BEING WITHIN THE ORDER LIMITS AND ANY OTHER CONSTRAINTS INCLUDED IN THE DEVELOPMENT CONSENT ORDER.
5. LEVELS SHOWN ARE INDICATIVE.

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REVISION	DRAWN	CHECKED	APPROVED	DATE
P02	JC	PC	PC	30/11/17

AMENDMENTS FOLLOWING SILVER REVIEW

REVISION	DRAWN	CHECKED	APPROVED	DATE
P02	JC	PC	PC	30/11/17

DESCRIPTION

Suffolk County Council

PROJECT TITLE

THIRD CROSSING

DRAWING TITLE

ENGINEERING SECTION DRAWINGS, ELEVATION AND PLANS

MAINLINE

REGULATIONS 5(2)(a), 5(2)(p) AND 6(2)(a)

SHEET 1 OF 1

DRAWING STATUS

WORK IN PROGRESS

DRAWN	CHECKED	APPROVED	AUTHORISED	SUITABILITY
JC	PC	??	??	S0

SCALE @ A1 SIZE

AS SHOWN

DATE

23/10/2017

REVISION

P02

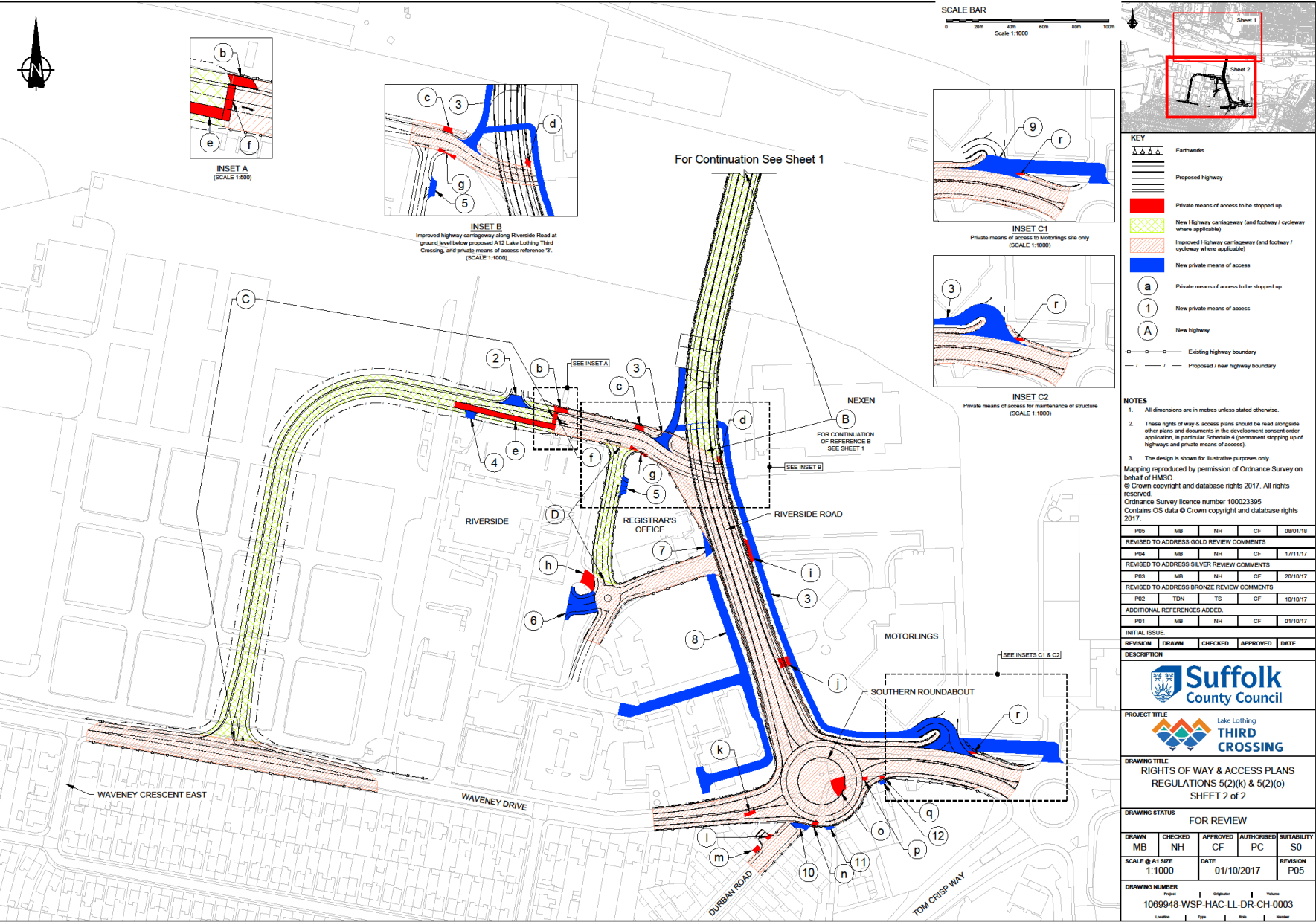
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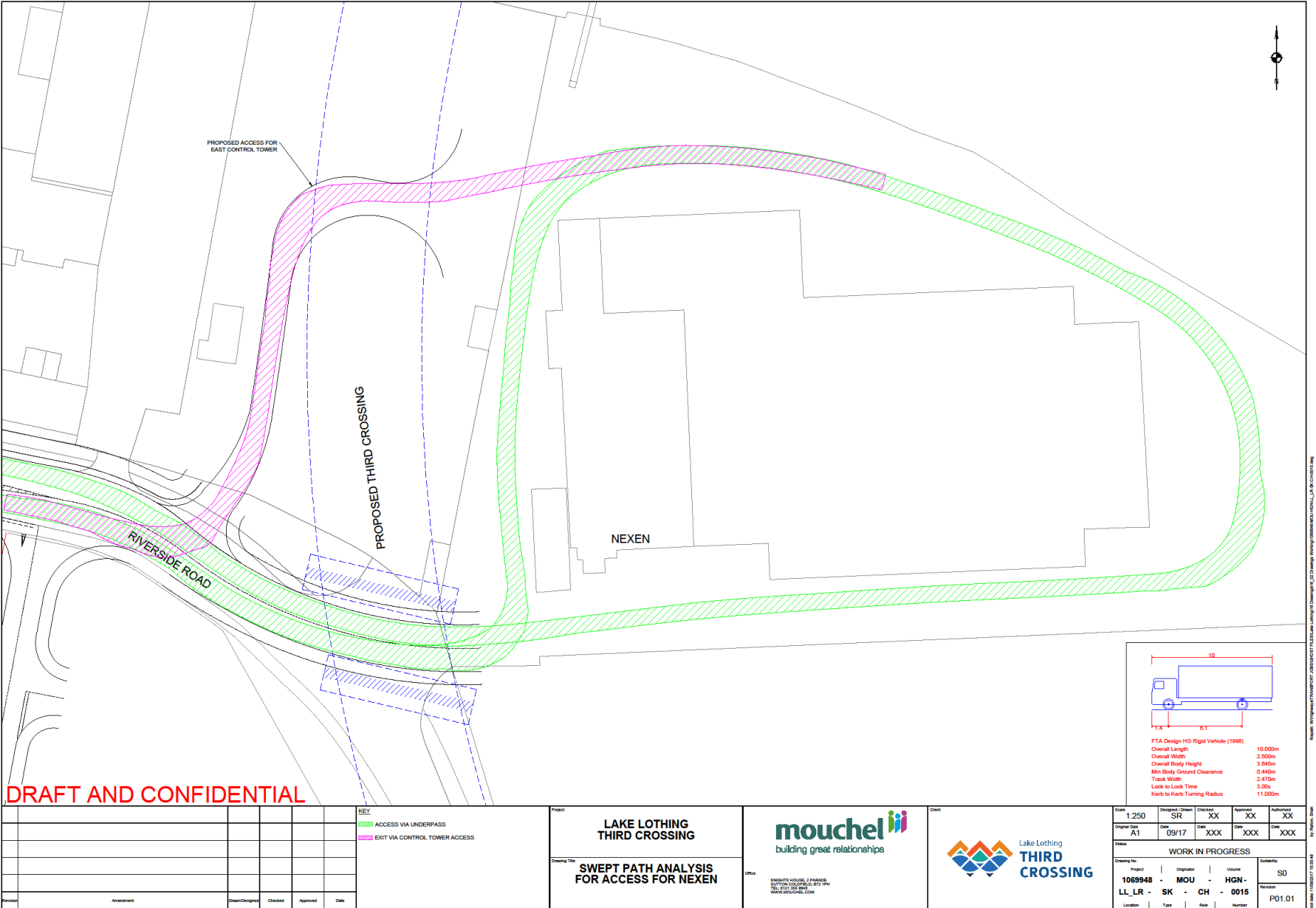
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(SCALE 1:1000 HORIZONTAL, 1:100 VERTICAL)

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NEXEN, RIVERSIDE ROAD, LOWESTOFT

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APPENDIX B

LLTC – HIGHWAY GEOMETRY CHECK TO DMRB, TD9

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Design Appraisal

High Geometry Check to DMRB - Vol 6 - TD9 - Highway Link design

SCC Scheme

Drawing **1069948-WSP-HML-LL-DR-CH-0101**

1 Description

Approx. 600m long link road running north-south across Lake Lothing.

At northern end commences at a 3-arm roundabout junction with Peto Way / Denmark Road.

At southern end connects via a 3-arm roundabout to Waveney Drive.

Central section (approx. ch. 240 to 280) is a bascule bridge with 12m high clearance above Lake Lothing for shipping.

Link road drawn as 7.3m carriageway with 3.5m footway cycleway on west side and 2.5 m footway on east side. Verges and structure width shown in addition to these.

2 Design Speed

Not stated on drawing.

Assume to be 30mph / 48kph speed limit for Urban Road.

Design speed category from TD9, para 1.8 and Table 2 = **60B**

3 Horizontal Alignment

Critical sections

A Chainage 35 to 174

Centreline radius actual = **135m**

Superelevation actual = 5%

TD9, table 3 Desirable minimum radius for 60B design = **255m**

Two steps below desirable minimum with 7% superelevation = **127m** radius

Hence, design has 2-steps of relaxation for radius + one further step of relaxation for superelevation.

Total number of horizontal relaxations = **3 nr**

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TD9, para 3.10 widening of lanes for curve radius between 90m and 150m = **0.3m**

Hence total carriageway width should be widened to **7.9m**.

No indication on drawing of widening. Departure from Standard required, or scheme to be amended.

B Chainage 343 to 422

Centreline radius = 220m

Superelevation = 5%

TD9, table 3 Desirable minimum radius for 60B design = 255m

One step below desirable minimum with 7% superelevation = 180m radius

Hence, design has 1-step of relaxation for radius + one further step of relaxation for superelevation.

Total number of horizontal relaxations = **2 nr**

4 Vertical Alignment

Chainage 0 to 15 gradient = **+2%**

Vertical curve = sag; $K = (67-15)/(6-2) = 13$ absolute minimum (**✓ok**)

Chainage 67 to 127 gradient = **+6%** desirable maximum (**✓ok**)

Vertical curve = crest; $K = (211-127)/(6-1.07) = 17$ desirable minimum (**✓ok**)

Chainage 211 to 243 gradient = **+1.07%**

Vertical curve = crest; $K = (321-243)/(1.07+3.5) = 17$ desirable minimum (**✓ok**)

Chainage 321 to 429 gradient = **-3.5%**

Vertical curve = crest; $K = (454-429)/(5.0-3.5) = 17$ desirable minimum (**✓ok**)

Chainage 454 to 538 gradient = **-5.0%**

Vertical curve = sag; 538 to end = **> 13** absolute minimum (**✓ok**)

**IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS**

5 Visibility and Stopping Sight Distance

TD9, table 3 Desirable minimum stopping sight distance for 60B design = **90m**

No relaxation of SSD allowed within 1.5 x SSD of roundabout Give Way line; i.e. within 135m.

Approach to northern roundabout - verge widening provided to accommodate 90m SSD (**✓ok**)

Approach to southern roundabout - alignment accommodates SSD within carriageway (**✓ok**)

6 Roundabout Junctions (and connections to existing roads)

Detailed geometry not provided.

Northern Roundabout observations

- Roundabout is shown as being 3m above existing ground and on embankment, at the link road entry arm.
- Allow 1m fall across 50m ICD roundabout (1 in 50, 2%).
- Requires 2m fall in 60m to connect with Peto Way + allowance for vertical curve tie-in. Can this be achieved?
- Requires 2.5m fall in 50m to connect with Denmark Road + allowance for vertical curve tie-in. Can this be achieved?
- Entry path curvature of >100m is possible on the link road approach to the roundabout.
- No indication of pedestrian crossing points on roundabout entries.

Southern Roundabout observations

- No indication of pedestrian crossing points on roundabout entries.

NEXEN, RIVERSIDE ROAD, LOWESTOFT

**IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS**



APPENDIX C

NEXEN DEVELOPMENT PROPOSALS

PROPOSED ELEVATION

PROPOSED SITE PLAN

PROPOSED FLOOR PLAN

NEXEN, RIVERSIDE ROAD, LOWESTOFT

IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS



FRONT ELEVATION



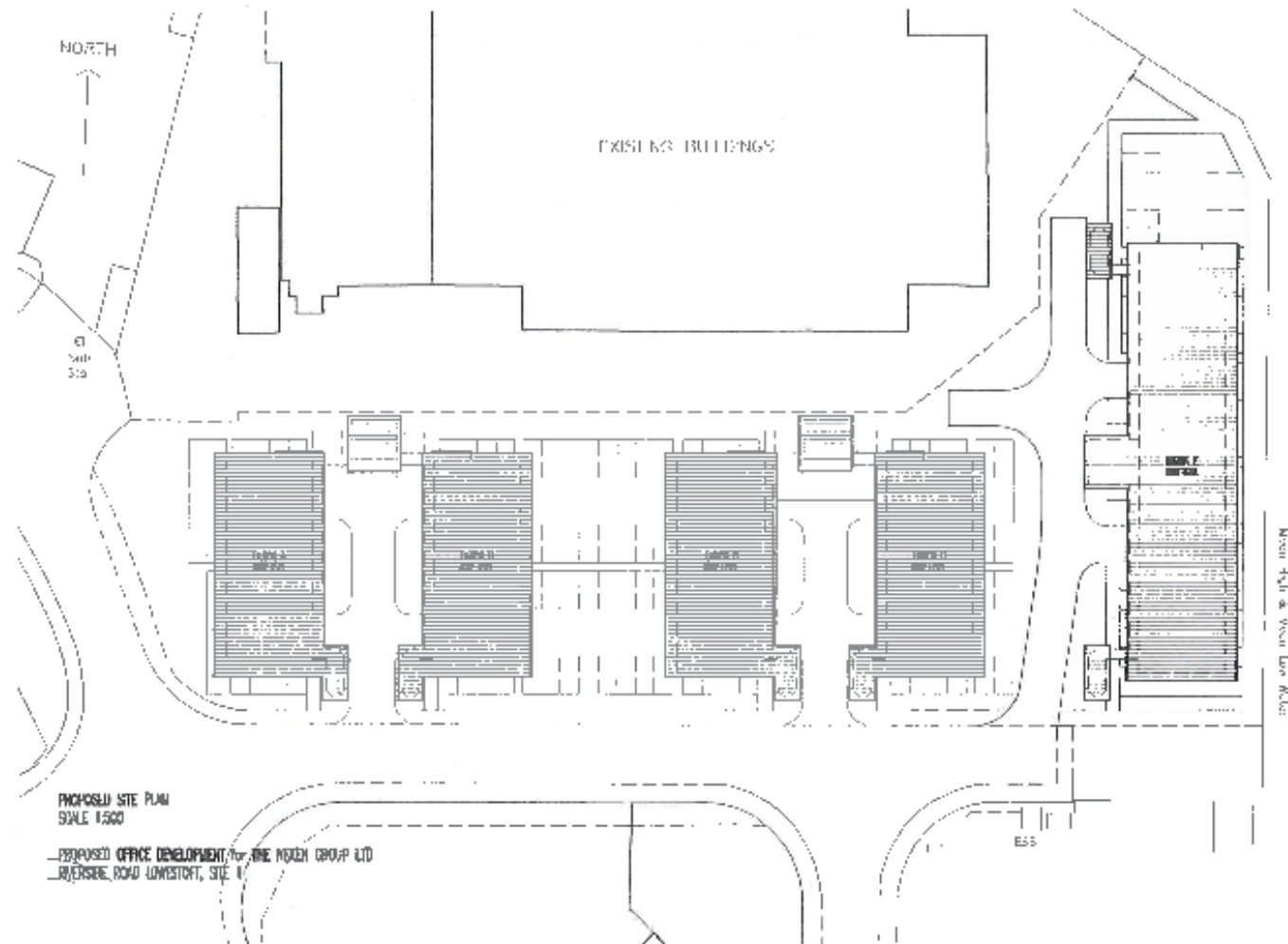
REAR ELEVATION TO HWY

PROPOSED ELEVATIONS BLOCK 'E'
SCALE 1:200

PROPOSED OFFICE DEVELOPMENT FOR THE NEXEN GROUP LTD
RIVERSIDE ROAD LOWESTOFT, SITE 1

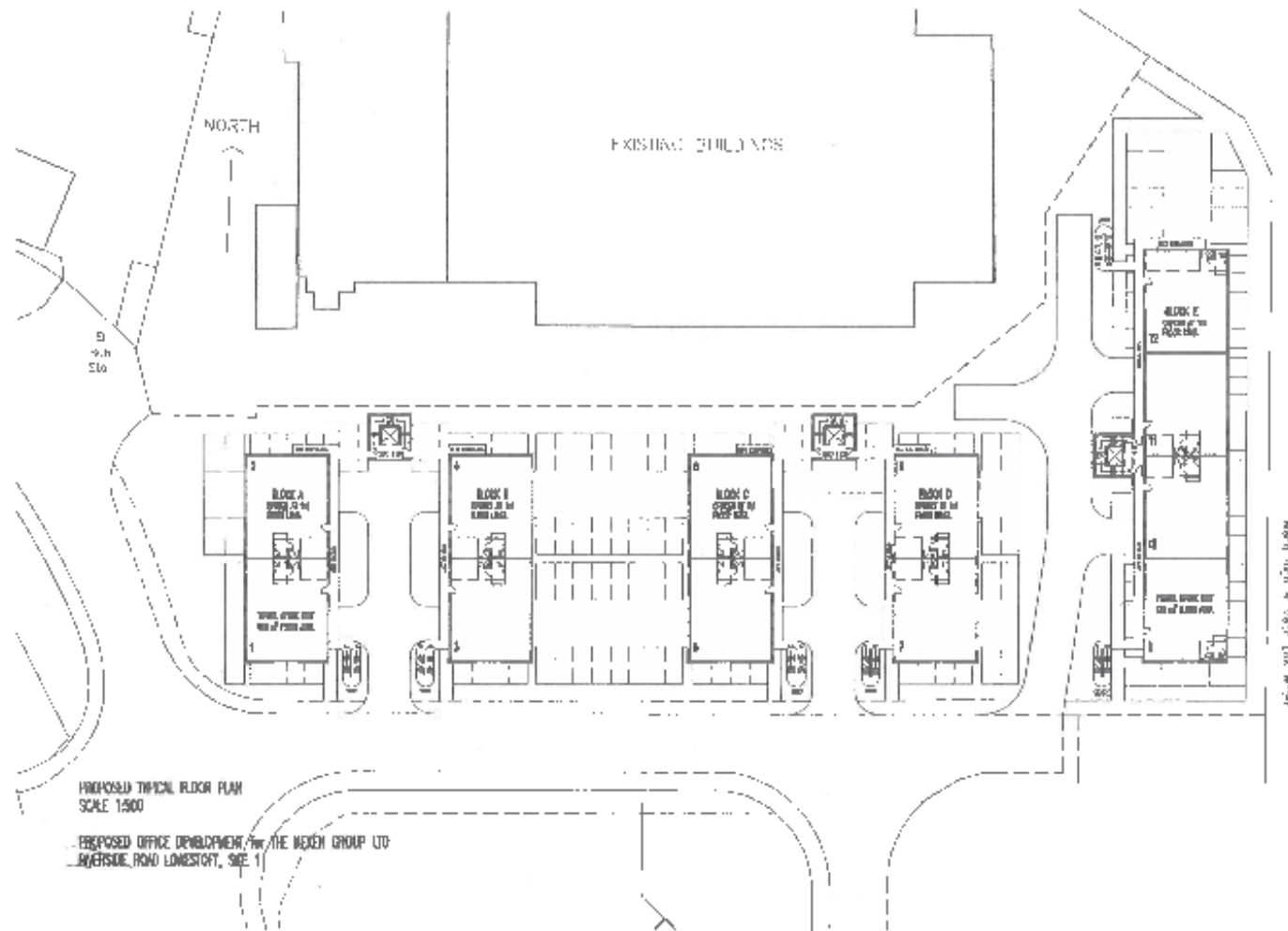
NEXEN, RIVERSIDE ROAD, LOWESTOFT

IMPACT OF LAKE LOTHING THIRD CROSSING ON NEXEN ACCESS AND OPERATIONS



NEXEN, RIVERSIDE ROAD, LOWESTOFT

IMPACT OF LAKE LOTHING THIRD CROSSING ON NEXEN ACCESS AND OPERATIONS



NEXEN, RIVERSIDE ROAD, LOWESTOFT

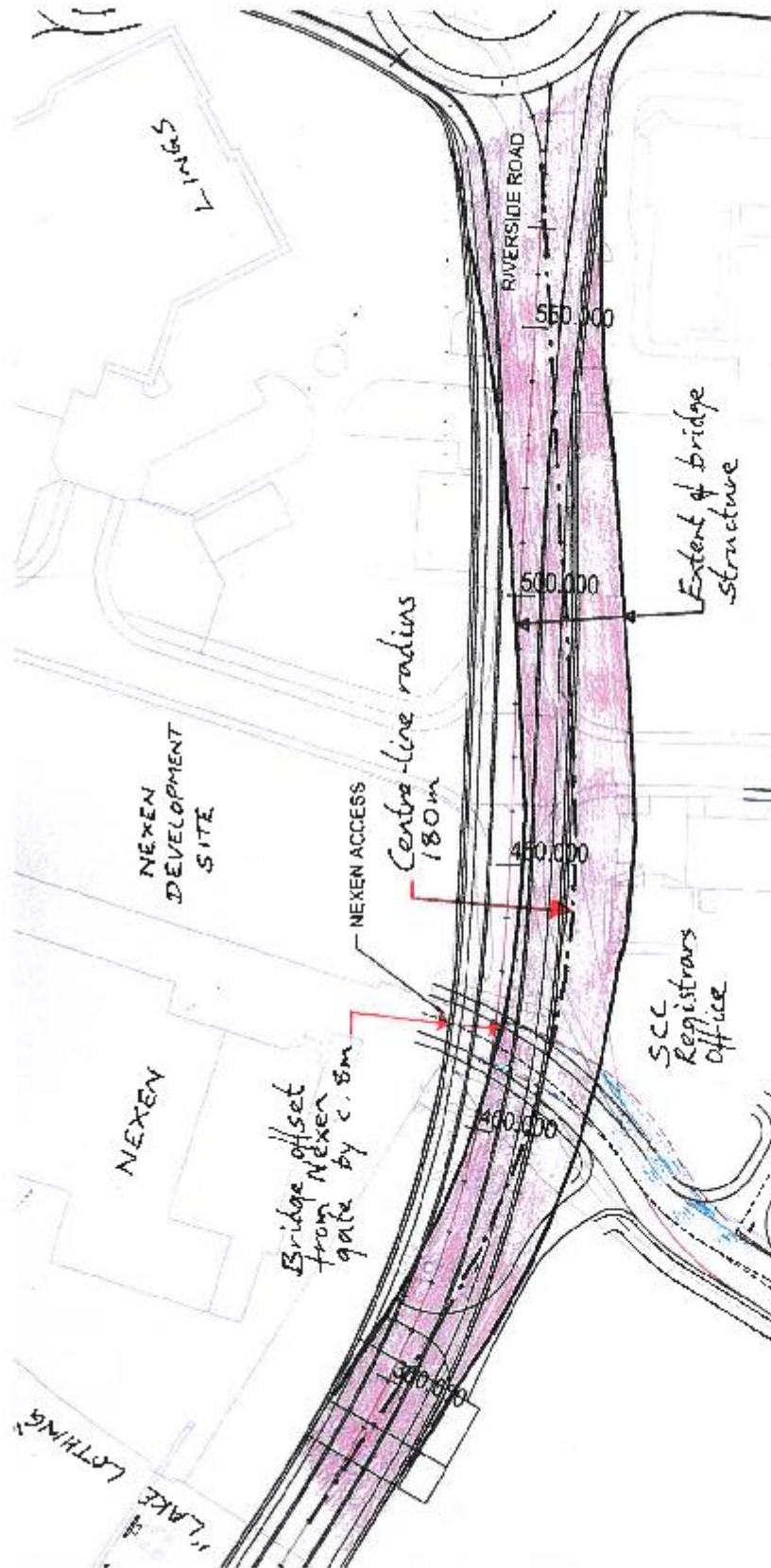


**IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS**

APPENDIX D

MAYER BROWN DRAWINGS

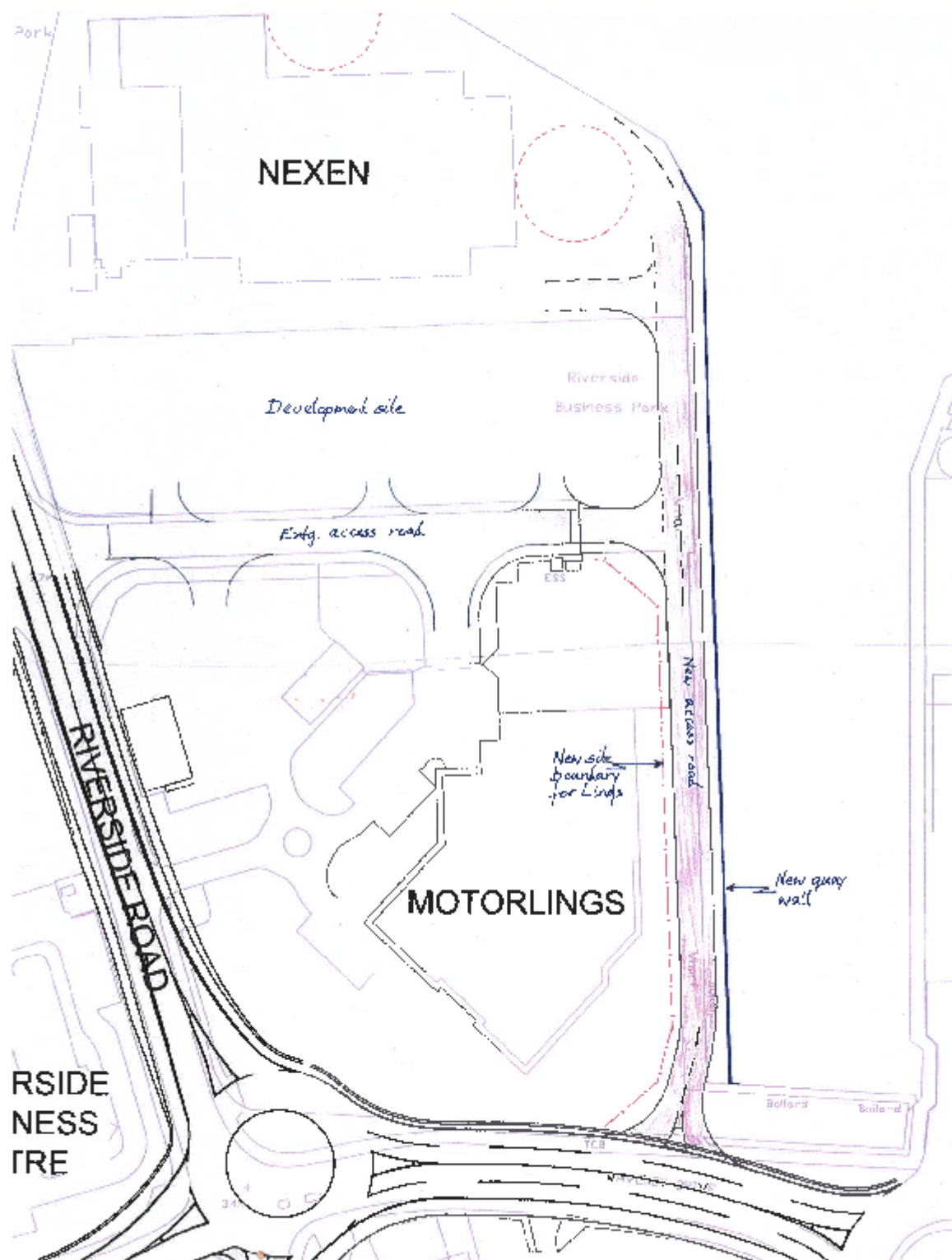
IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS



MB SK 180713
1:1000 (approx) @ A4

Based upon extract from SCC
dmg. no. 10699948 - WSP-HM4-LL-DR-CH-0101, P02

**IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS**



MB SK 180720

1:1000 approx. @ A4



**NEXEN
RIVERSIDE ROAD
LOWESTOFT**

**LAKE LOTHING THIRD
CROSSING
HIGHWAY ENGINEERING
APPRAISAL**

**IMPACT ON ACCESS AND
OPERATIONS**

REPORT 2

JANUARY 2019

the journey is the reward



**NEXEN
RIVERSIDE ROAD, LOWESTOFT**

**LAKE LOTHING THIRD CROSSING
HIGHWAY ENGINEERING APPRAISAL**

IMPACT ON ACCESS AND OPERATIONS

REPORT 2

JANUARY 2019

Project Code:	NEX-LOW.1
Prepared by:	TPM
Position:	Director
Issue Date:	08-01-19
Status:	Issue

Contents

1. Introduction
2. Description of Lake Lothing Third Crossing (LLTC)
3. Description of Nexen Property and Operations
4. Impact of Updated Proposals for LLTC on Nexen Site Access and Operations
5. Summary

Appendix A

Suffolk County Council Drawings

Appendix B

Mayer Brown Drawings

1 Introduction

- 1.1 This report supplements an earlier report by Mayer Brown (September 2018), which assessed the impact of the published LLTC highway and access proposals on the Nexen properties and operations.
- 1.2 This report provides an assessment of alternative access proposals for Nexen as provided for LLTC by Suffolk County Council (SCC).
- 1.3 Updated and alternative access proposals were provided by LLTC/SCC on 31st October 2018. These proposals were provided following a meeting on 11th September 2018 attended by representatives of Mayer Brown, Colliers (Nexen Land Agent), Suffolk County Council and Ardent (SCC Agent); to discuss the matters raised in the first report and other land and town planning issues.
- 1.4 The geometric design of LLTC is provided on drawings and other documents prepared for SCC.
- 1.5 The site layout and constraints are as provided and described by the management of Nexen. These factors are also as observed on site by the author.
- 1.6 The operations of Nexen and of associated companies based at the property are as described to the author by the management representatives of Nexen.
- 1.7 This report is prepared, in accordance with a brief agreed with SCC to assess the impact upon the Nexen property of the alternative layout and geometric information provided by them.

2 Description of Lake Lothing Third Crossing

2.1 *The general proposals for the LLTC are as described in the earlier Mayer Brown report (September 2018), Section 2.*

2.2 The scheme as presented will take up land from the Nexen property, including the site access gates and entrance, and will have impact on the movement of vehicles in to, around and out of the property.

2.3 The scheme as presented removes access to the southern parcel of the Nexen land holding, which is identified for future development.

2.4 The original scheme proposal includes for a new access route to the Nexen property through one of the open spans of the bridge structure. A standard highway headroom for vehicles of 5.3m is identified.

2.5 Alternative Scheme –

Plans and drawings of an alternative access arrangement (Option 2) for the Nexen warehouse and factory site were provided on 31/10/2018. The following drawings were provided and are attached at Appendix A :-

1069948-SCC-HGN-LL-DR-KK-0007 ALTERNATIVE NEXEN ACCESS OPTION 2

1069948-SCC-HGN-LL-DR-KK-0008 ALTERNATIVE NEXEN ACCESS OPTION 2
 SWEPT PATH ANALYSIS

1069948-SCC-HGN-LL-DR-KK-0009 NEXEN ACCESS (BASE DESIGN)
 HEIGHT CLEARANCE AND SWEPT PATH ANALYSIS

2.6 The Option 2 proposals illustrate that the horizontal and vertical alignments of the LLTC across the bridge structure are not changed. Hence, the scheme continues to take up land from the Nexen properties and will have an impact on the movement of vehicles in to, around and out of the properties.

2.7 The Option 2 proposal drawings illustrate amended headroom clearance under the LLTC bridge structure spans, for the original Nexen access and for other spans.

2.8 The Option 2 scheme includes for an alternative heavy goods vehicle access to the Nexen warehouse and factory site, which is located further to the north and through a different open span of the bridge structure. This span provides an increased headroom for vehicle access when compared to the original scheme proposal; 7.01m c/w 5.3m.

2.9 It is noted that the Option 2 proposals do not provide for a new and separate access for the southern parcel of the Nexen land holding.

3 Description of Nexen Property and Operations

- 3.1 The Nexen land holding is located immediately to the east of Riverside Road. It is bounded to the north by Lake Lothing, to the east by Kirkley Ham (an inlet of Lake Lothing) and to the south by property occupied by Lings Motor Group.
- 3.2 The land holding is formed of two distinct parcels with different uses.
- 3.3 The north parcel, of 2.50 acres, is occupied principally by the factory, offices, warehousing and yards; used for the manufacturing, assembly and warehousing activities of Nexen Lift Trucks and associated companies.
- 3.4 This Nexen property provides a base for the HiTech GP Formula 3 motor racing team. This company uses articulated vehicles at the property for the transport of their cars, support teams and equipment. The company occupies space at the east end of the Nexen building.
- 3.5 The southern parcel (Riverside Business Park), of 1.27 acres, is currently undeveloped but is designated for employment uses, B1,2 and B8 and is within an Enterprise Zone. This parcel was granted planning permission for development as offices in March 2007 (Ref DC/06/1331/OUT) with access from the adjoining road, flanking Lings premises.
- 3.6 *The operation of and access arrangements for the two Nexen land parcels are described in the earlier Mayer Brown report (September 2018), Section 3, paragraphs 3.6 to 3.15.*

4 Impact of LLTC Option 2 on Nexen Site Access and Operation

4.1 The LLTC scheme generally (all options) will have the following direct effects on the Nexen property:-

- Removal and/or relocation of existing entrance gates.
- Removal of electricity transformer located immediately to the west of the entrance gates.
- Restriction in use of part of access road and vehicle turning space at the west end of the property.
- Easement rights over other land at the west end of the property for access and maintenance of the LLTC bridge structure.
- Complete removal of access route to the southern development land parcel.
- Reduced area available for the development of the southern parcel.

4.2 *The impact of the original LLTC scheme as presented is described in detail in the earlier Mayer Brown report (September 2018), Section 5.*

4.3 LLTC Option 2 is presented to overcome some of the adverse impacts of the original scheme, notably by the following:-

- Improved headroom clearance through the LLTC bridge structure to accommodate passage of heavy goods vehicles and specialise fork lift trucks and container loaders.
- Alternative plan layout of access road to better accommodate low-loader swept path for routes in to and out of the Nexen warehouse and factory site.
- Provision of separation access routes for heavy goods vehicle traffic (to warehouse / factory) and car traffic (to offices) on to the Nexen site.

4.4 The precise land to be taken up by the LLTC proposals has not been clearly identified by SCC on their drawings. In particular, the intentions for securing an easement for maintenance alongside the bridge are not known. The drawings do not indicate any proposals for the relocation of the Nexen access gates, although the very close proximity of these to the new bridge structure would suggest that some movement is required.

Transporting of Specialist Vehicles

4.5 It is recorded that Nexen house and operate a number of large fork lift trucks and container loaders at their site; including the following vehicles:-

- | | | | |
|----|--|---|---------|
| a. | Yale GDP160 fork truck | | |
| | Closed height on the ground | - | 4.865m. |
| | Closed height on a step frame low loader | - | 5.465m. |
| b. | SMV SL37 top loader container handler | | |
| | Closed height on the ground | - | 6.200m. |

These vehicles are regularly transported off site for use at other locations.

- 4.6 LLTC Option2 drawings 1069948-SCC-HGN-LL-DR-KK-0008 and -0009 (*see Appendix A*) provide swept path analyses for a low-loader vehicle entering the Nexen warehouse and factory site at two access points.
- 4.7 It is noted that the vehicle selected is a generic 18.0m long low-loader with trailer steering. The swept path analysis does illustrate that this vehicle can enter on to the site, turn around and leave the site, making use of the site weighbridge if necessary.
- 4.8 Notwithstanding 4.7 above, it is noted that an 18m low loader *with* trailer steering is not the vehicle used by Nexen for the transporting of their loads and or specialist vehicles on or off the site. The swept path analysis required should be undertaken with a low-loader without trailer steering.
- 4.9 The LLTC Option 2 proposals (see drawing 1069948-SCC-HGN-LL-DR-KK-0007) illustrate that the headroom clearance of accesses on to Nexen site through the LLTC bridge spans have headroom clearance been increased to 6.5m (original access point) and 7.01m (new more northerly access point).
- 4.10 Taking account of 4.5 to 4.8, SCC has provided no certainty or guarantee that Nexen can continue to use a low-loader at the site for the transport specialist vehicles.

HGV Access location

- 4.11 The LLTC Option 2 plans illustrate a new heavy goods vehicle access route on to the Nexen site (see drawing 1069948-SCC-HGN-LL-DR-KK-0007). This is provided to the north of the existing site access and approaches the flank of the Nexen warehouse / factory building. The main 'goods-inward' door for the Nexen factory is located immediately in front of the new proposed access.
- 4.12 SCC have not provided a swept path analysis for usual heavy goods vehicles using the new proposed access. Moreover, they have not provided a swept path analysis for vehicles entering or leaving the site when a heavy goods vehicle is being unloaded at the goods inward door.
- 4.13 The swept path analysis for a low -loader using the proposed access (see drawing 1069948-SCC-HGN-LL-DR-KK-0008) illustrates that this vehicle could only enter or leave the site when another vehicle is not already at the goods inward door. Based upon this drawing and relative vehicle sizes, it is apparent that this situation will be repeated for any other heavy good vehicle entering or leaving the site. See also sketch MBSK 190102-1 at Appendix B.
- 4.14 The current site layout at Nexen does allow for one heavy goods vehicle to pass another parked up at the goods inward door. See sketch MBSK190102-2 at Appendix B.
- 4.15 Taking account of 4.13 and 4.14 above, the LLTC Option 2 access would provide a worse situation, rather than an improvement, for vehicles entering the site. Use of the new access would only be possible when the goods inward door was not in use; thereby placing a restriction on the times of operation of other vehicle users of the site.
- 4.16 To overcome the situation described at 4.11 to 4.15, an alternative access route further to the north should be considered, to allow heavy goods vehicle access directly in to the Nexen service yard and turning area. A sketch proposal is shown at MBSK 190202-3 at Appendix B. This provides for an access running to the west of the LLTC, passing the Control Tower and then turning east towards Nexen alongside the Lake Lothing quay.

- 4.17 The LLTC Option 2 access arrangement will mean that the weighbridge on the site is no longer on the principle access / egress route for heavy goods vehicles visiting the site. Heavy goods vehicles using the weighbridge would either i] perform a new forward-then-reverse manoeuvre or ii] make use of the existing site access, thereby negating the reason for providing a new access point.
- 4.18 For reasons of operational safety and efficiency, the new access arrangement proposals should also include for relocation of the weighbridge to a position that places it more directly on the heavy goods vehicle egress route.

Access to Nexen Development Site

- 4.19 As noted in the earlier Mayer Brown report (September 2018), the southern parcel of the Nexen site has access arrangements on to the west-east access road that lies further to the south and thereby has a route directly on to Riverside Road. The LLTC removes the access route of the southern parcel.
- 4.20 SCC intend that the southern parcel gains access from the existing access to the Nexen warehouse and factory site. This arrangement maintains the concerns raised in the earlier Mayer Brown report; being:
1. Increase traffic use of a single point of access.
 2. Increased conflict of hgvs / car traffic / pedestrians (although this is partly mitigated by the proposal for a new more northerly access for heavy goods vehicles).
 3. No consideration has been given to the matter of how to accommodate open and direct access arrangements for the proposed office development, whilst maintaining secure fencing and gates for the factory/warehouse site.
- 4.21 It is not part of this appraisal to provide commentary on the legal or town planning aspects of the access rights of the southern parcel as existing. However, it is understood by the author that Nexen and their legal advisors can provide evidence to substantiate that the southern parcel does have existing rights of access on to Riverside Road via an existing private access road further to the south of the parcel.

Other observations

- 4.22 *The earlier Mayer Brown report (September 2018) included some suggested two alternative amended proposals for the LLTC alignment and for access to the Nexen site. These are described in Section 6 of the earlier report.*
- 4.23 The first suggested alternative was for the LLTC alignment to be moved approximately 8m to the west in the vicinity of Nexen; thereby reducing the impact of the scheme on the Nexen warehouse and factory site. This alternative does not compromise adherence of the LLTC to the required highway design standards (Design Manual for Roads and Bridges).
- 4.24 The second suggested amendment was for a new access road to be provided in to the Nexen parcels from the south, along Kirkley Ham and alongside or through the adjacent Lings site. This would serve to replace the separate access arrangement for the southern parcel and also accommodate the movement / transport of oversized specialist vehicles.

- 4.25 It is noted that the new proposals from SCC do not seek to take on board these suggested alternatives. Hence, the proposals contained in the earlier Mayer Brown report still stand.
- 4.26 There has been no information provided by SCC with regard to arrangements to allow access to the Nexen properties during the construction phase of the LLTC project.

7 Summary

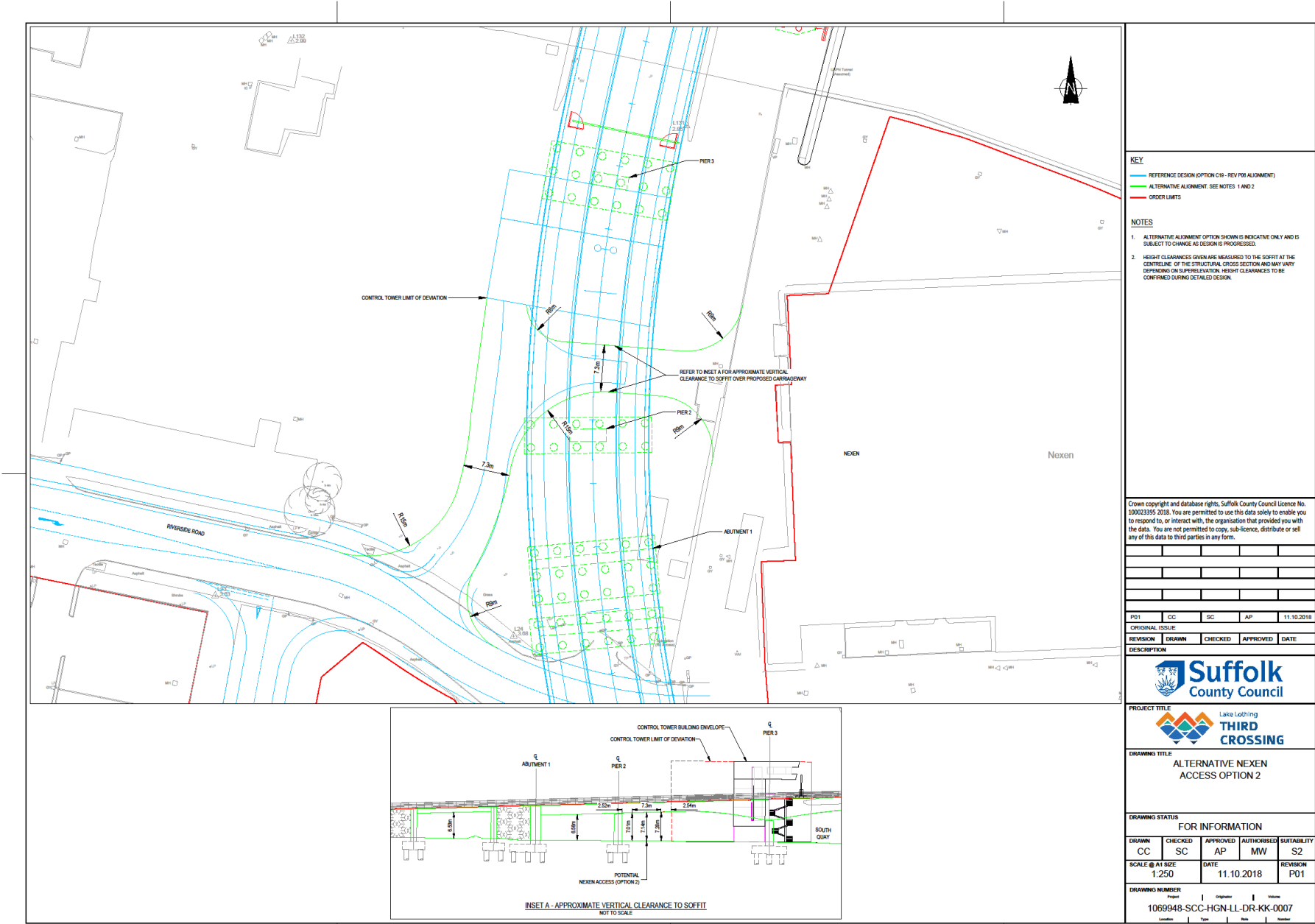
- 7.1 The following paragraphs describe the key items highlighted by this appraisal of the impact of the LLTC Option 2 proposals on the property and operations of Nexen.
- 7.2 SCC has not undertaken appropriate or adequate assessment of the vehicular access or movement arrangements for the existing Nexen factory / warehouse premises. There has been inadequate consideration of the actual types of vehicles that are in regular use at the property. There has been limited consideration of the operational use of the site; e.g. access doors and their use, vehicle circulation and routeing, vehicle turning, weighbridge location, separation of hgv's and car traffic.
- 7.3 The full impact of the LLTC structure and maintenance access have not been adequately assessed or presented. The SCC proposals do not show rights of way and maintenance access requirements. A far greater impact in terms of land take from the Nexen parcels might be inferred from the LLTC road and bridge scheme layout plans.
- 7.4 The LLTC Option 2 proposals provide for a new access proposal for the Nexen northern parcel. There is no new access arrangement shown for the southern parcel development area.
- 7.5 The new access shown for the Nexen northern parcel, comprising the warehouse and factory site, is inadequate and does not accommodate the vehicles and operations currently employed.
- 7.6 In particular, the access arrangement illustrated on the LLTC Option 2 proposals does not allow for free movement of heavy goods vehicles on to or off the site when other vehicles are already present.
- 7.7 The LLTC severs the development area of the Nexen southern parcel from the highway network and provides no alternative means of access.
- 7.8 It is noted that the above observations are made with regard to a finished scheme. No consideration has been given or shown by SCC with regard to arrangement for access to the Nexen properties during the lengthy LLTC construction stage.
- 7.9 Overall, it is considered that the LLTC proposals as presented will have a severe and damaging impact on the operational use of the existing Nexen factory and warehouse premises on their northern parcel. Insufficient and inadequate consideration has been given to the way that the site currently operates and of the vehicles that enter and are used at the site. The land to be taken and the alternative means of access presented do not allow the site to continue to be operated as Nexen currently so do.
- 7.10 The LLTC proposals as presented will sever the development area of the Nexen southern parcel from the road network. No alternative means of access is presented as being provided. A new means of access is required for the development of the parcel to be undertaken as currently envisaged.

APPENDIX A

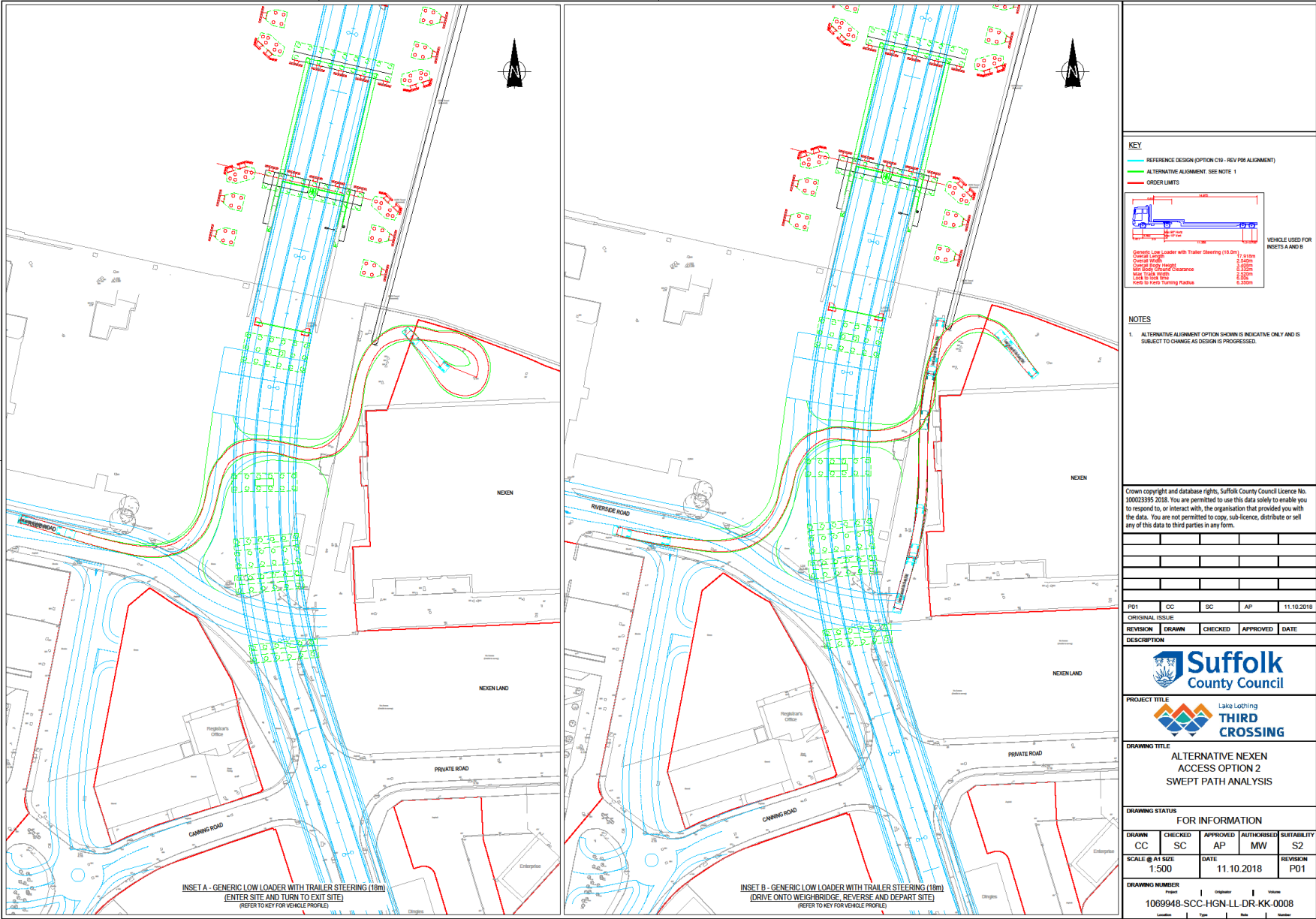
SUFFOLK COUNTY COUNCIL DRAWINGS

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1069948-SCC-HGN-LL-DR-KK-0008	ALTERNATIVE NEXEN ACCESS OPTION 2 SWEPT PATH ANALYSIS
1069948-SCC-HGN-LL-DR-KK-0009	NEXEN ACCESS (BASE DESIGN) HEIGHT CLEARANCE AND SWEPT PATH ANALYSIS

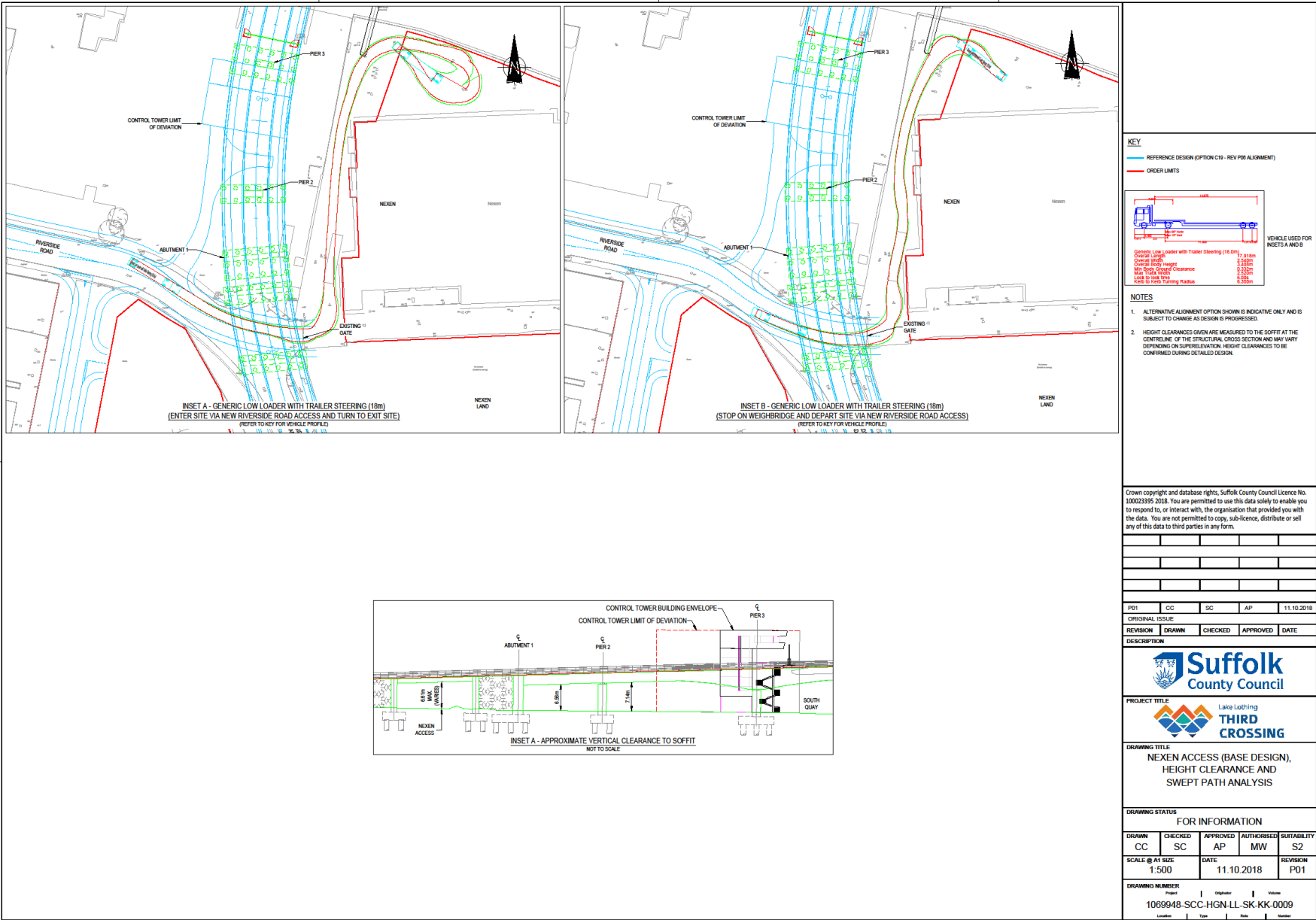
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IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS
REPORT 2



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IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS
REPORT 2



NEXEN, RIVERSIDE ROAD, LOWESTOFT
IMPACT OF LAKE LOTHING THIRD CROSSING
ON NEXEN ACCESS AND OPERATIONS
REPORT 2



APPENDIX B

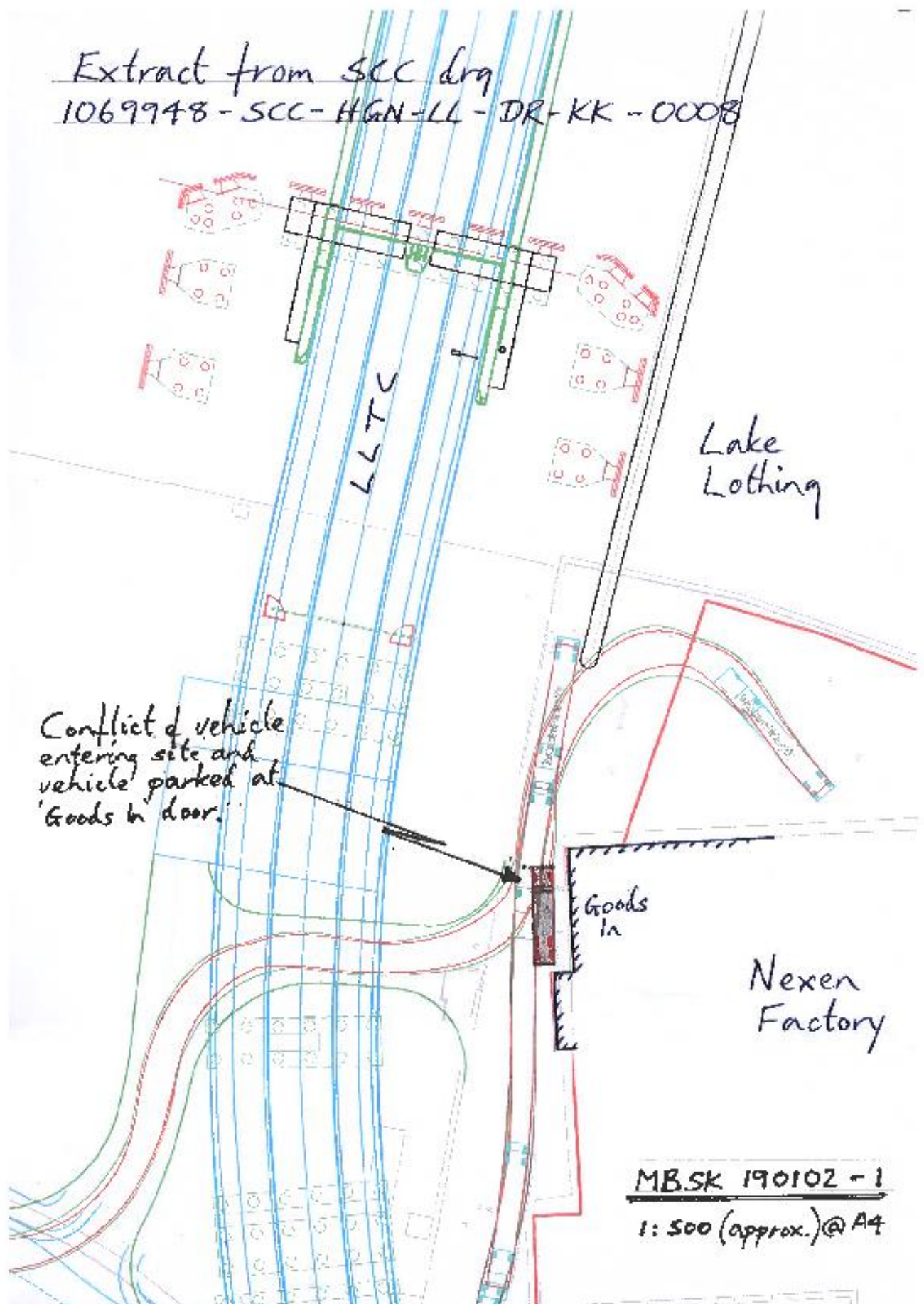
MAYER BROWN DRAWINGS

MBSK 190102-1

MBSK 190102-2

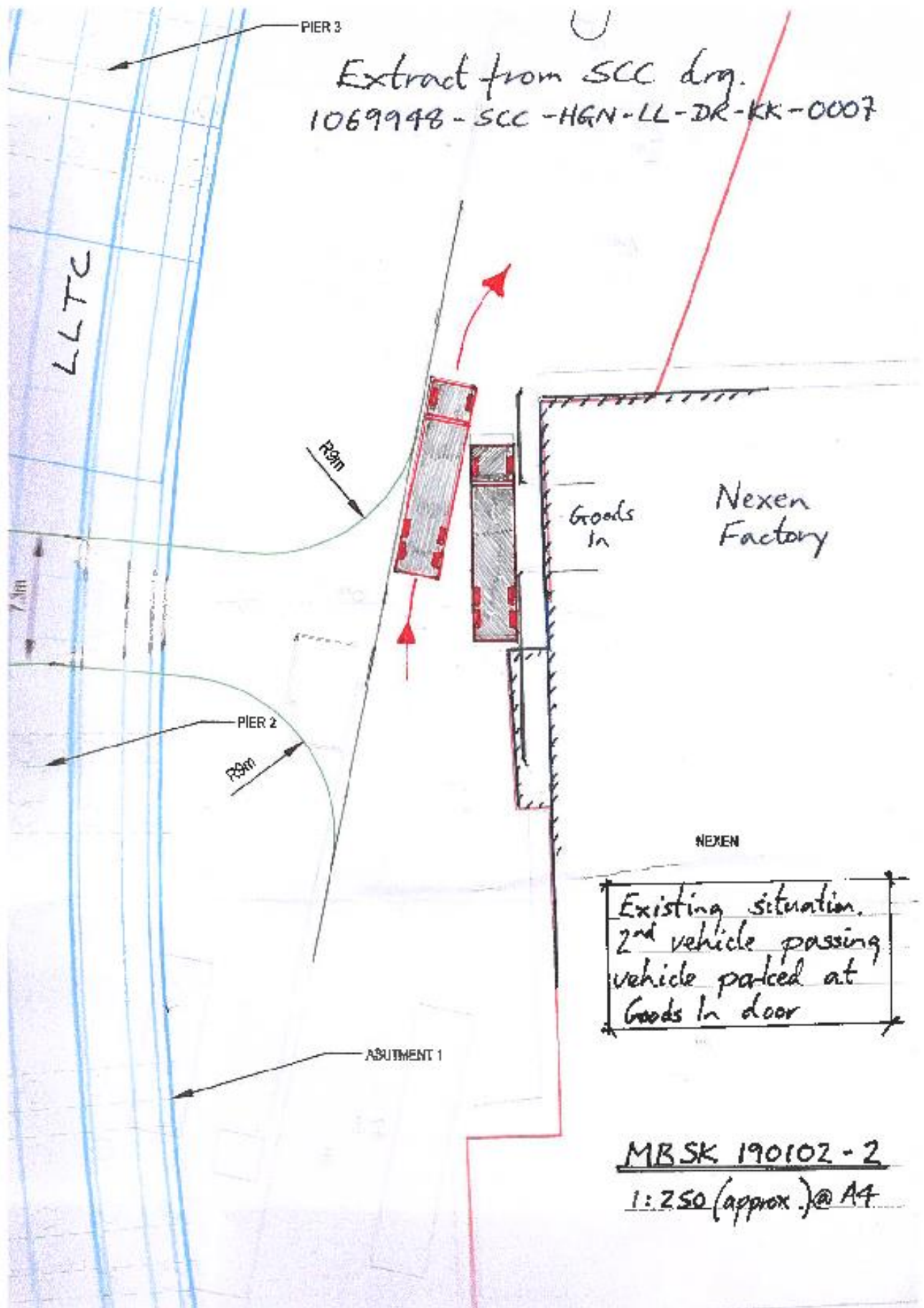
MBSK 190102-3

NEXEN, RIVERSIDE ROAD, LOWESTOFT
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REPORT 2



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