

Energy and Climate Adaptive
Infrastructure Policy

Traffic and Transport

Supplementary Guidance Document



This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy, which was adopted by Suffolk County Council's cabinet, on the 16th of May 2023.

The scope and purpose of this Supplementary Guidance Document

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating specific low-carbon technologies. This, therefore, creates significant challenges for the economy, environment, and communities of Suffolk.

The purpose of this Supplementary Guidance Document is to outline how, in principle, the Council:

- Wishes for applicants to offer pre-submission engagement with the Local Highway Authority to reduce and minimise issues arising later in the NSIP process and ensure that the Examination focusses on matters of public safety and scheme preparedness for construction, operation, and decommissioning.

This Supplementary Guidance Document has been drafted in collaboration with Norfolk County Council and Essex County Council.

Key Acronyms

AIL	Abnormal Indivisible Load	LHA	Local Highway Authority
DMRB	Design Manual for Roads and Bridges	MfS	Manual for Streets
HGV	Heavy Goods Vehicle	PROW	Public Rights of Way
LGV	Light Goods Vehicle	SCC	Suffolk County Council



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Roles and responsibilities

The Role of the Local Highway Authority

The Planning Inspectorate's [Nationally Significant Infrastructure Projects: Advice for Local Authorities](#) outlines the generic role of local authorities throughout the NSIP process. These responsibilities include inter alia: production of a Local Impact Report (LIR), written representations, and any Statement of Common Ground (SoCG).

The Local Highway Authority (LHA) is responsible for maintaining and repairing the highway, as well as providing and managing flood risk for highway drainage and roadside ditches. Section 16 of the Traffic Management Act 2004 places a duty on the authority to secure the expeditious movement of traffic on the authority's road network and facilitate the same on road networks for which another authority is the traffic authority.

The Local Highway Authority is consulted by the Local Planning Authority on any planning applications that may have an impact on the highway. The LHA may request mitigation measures in form of works to the highway, provision of active travel, sustainable transportation, and/or financial contributions towards strategic programmes. In regard to NSIPs, the role of the LHA extends to drafting the Traffic and Transport section of the Local Impact Report, responding to the transport sections of the Environmental Statement, relevant management plans such as the Construction Traffic Management Plan, Transport Assessment and Travel Plan during the examination and providing guidance on safe visibility splays for site accesses amongst other responsibilities.

SCC would highlight the value of pre-submission engagement with the local highway authority. Amongst other benefits, this early consultation will benefit the process by way of agreeing the methodologies which will inform the Transport Assessment and Environmental Statement chapter on Transport and Access Impacts. Thus, avoiding later disagreement during the Examination stage. Previously, SCC has had experience of inaccurate assumptions used and input into the transport assessment and deficiencies in the highway-related provisions in the draft development consent order (dDCO). If pre-submission engagement is not undertaken, considerable resources will be required to be dedicated to remedial work during the concentrated 6-month Examination stage.

Not all public highways are maintainable by Suffolk County Council,¹ therefore, to find out whether a road or path is maintainable by the local highway authority please review the [National Street Gazetteer](#).

¹ www.suffolk.gov.uk/roads-and-transport/highway-maintenance/road-adoption/highways-and-private-roads

Relevant Policy Considerations

The [Overarching National Policy Statement for Energy \(EN-1\)](#) (2024) outlines Traffic and Transport impacts relating to highways in Nationally Significant Infrastructure Projects.

Suffolk County Council's [Energy and Climate Infrastructure](#) Policy (2023) is a local policy setting out our approach to dealing with proposals for critical energy and climate adaptive infrastructure, and engagement with Government departments and agencies.

The [Design Manual for Roads and Bridges \(DMRB\)](#) is a set of national documents containing the requirements for the design, assessment and operation of trunk road and motorways.

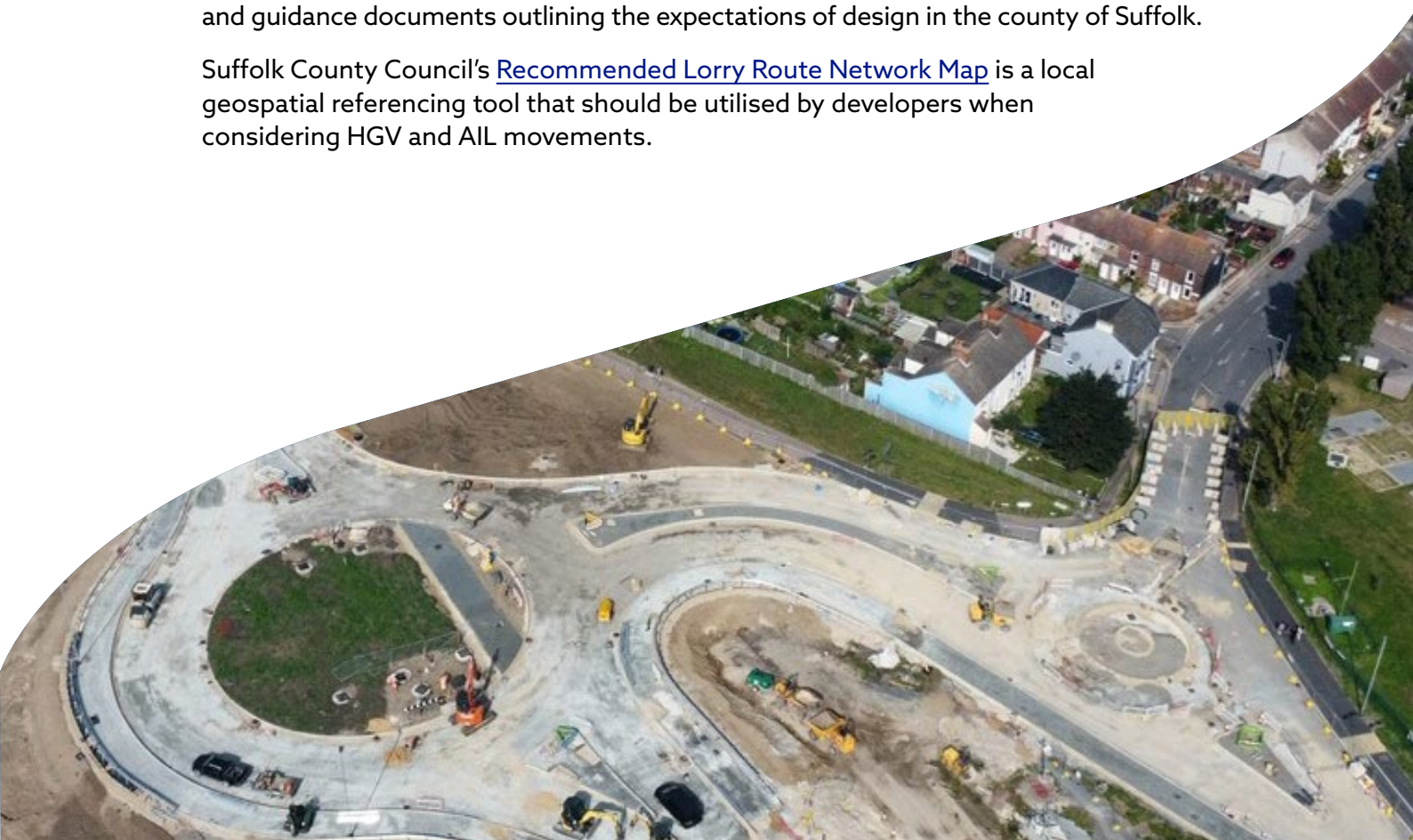
The [Manual for Streets](#) (2007) and [Manual for Streets 2](#) (2010) are two complimentary national guidance documents for local authorities on designing residential and busier urban streets respectively.

The IEMA [Guidelines for the Environmental Assessment of Traffic and Movement](#) (2023), are national guidelines and should be considered by developers when assessing traffic and transport impacts.

[The Local Transport Note 1/20](#), more commonly known as LTN 1/20, is a national policy document focussed on active travel and outlines the requirements for cycling infrastructure such as cycle lanes and parking.

Suffolk County Council's design documents: [Suffolk Design: Streets Guide](#) (2022), [Suffolk Guidance for Parking](#) (2023), [SCC Development Design Manual, Application for Agreements or Minor Works Licence](#), and [Travel Plan Guidance](#) are local policy and guidance documents outlining the expectations of design in the county of Suffolk.

Suffolk County Council's [Recommended Lorry Route Network Map](#) is a local geospatial referencing tool that should be utilised by developers when considering HGV and AIL movements.





1.1 The status and importance of Public Rights of Way in Suffolk

The County Council's clear preference is that Public Rights of Way and amenity should be dealt with in their own chapter of the Environmental Statement, in order that the impact of a scheme on the rights of way network and its receptors can be properly understood, including the interactions between different parts of the scheme, both temporally and spatially.

Please refer to Suffolk County Council's supplementary guidance document for [Public Rights of Way and Green Access](#) for more information.

1.2 Assessment of Traffic and Transport

Unless otherwise scoped out through discussions, the DCO will require an assessment of the traffic and transport impacts of the scheme. The assessment is typically divided between two documents: the Transport Assessment and a separate Chapter within the Environmental Statement. Other topics such as noise, air quality and vibration may also be relevant to transport. There is often crossover between the information provided within the two documents and it is expected that they would include the following, with the level of detail provided commensurate with the scale of development and impacts:

- Baseline transport network description
- Sustainable transport routes
- Assessment of road safety
- Traffic generation for construction and operation (including methodology and profile across construction). Including:
 - Worker numbers
 - Worker shift patterns
 - Light vehicles numbers
 - HGV numbers
 - ALL numbers
- Traffic distribution (including methodology) and construction traffic routeing
- Committed development
- Traffic and multimodal survey data
- Junction assessments
- Opportunities for transporting construction materials by sustainable modes
- Mitigation, including enhancement for sustainable transport
- Methodology for assessing environmental impacts, including:
 - Consideration of Institute of Environmental Management and Assessment Guidelines
 - Consideration of Design Manual for Roads and Bridges document LA112 – Population and Human Health
 - Assessment timeframes (i.e. daily and hourly)
 - Impact criteria
 - Link sensitivities
 - Cumulative effects
 - Assessment of vegetation loss through Arboricultural Impact Assessments (in accordance with the current BS 5837 Trees in Relation to design, demolition, and construction) and Hedgerow Assessments (in accordance with the [Hedgerow Regulations 1997](#))
 - Proposed mitigation and compensation for vegetation loss resulting from new access points and haul roads, including bespoke compensation agreed with local planning authorities on a case-by-case basis for the loss of irreplaceable habitat (such as veteran trees). This should include aftercare and long-term management of any mitigation planting.

When considering the assessment of environmental impacts of traffic and transport, Applicant's should be mindful that any thresholds being applied are starting points for considering impacts, often based on limited evidence, and should be treated very cautiously. The rationale for impact criteria, thresholds and link sensitivities should be well-evidenced and reflect the specific considerations of each location.

It is considered sensible that the Applicant undertakes scoping discussions with SCC to identify and agree the appropriate assessment methodology.

1.3 Management Plans

Typically, at application stage many matters will be subject to confirmation following appointment of a contractor. In such cases the management plans should be considered as outline documents with final approval secured by a requirement.

Clarity will be required regarding inclusion of pre-commencement works in the management plans, or if not, how transport impacts arising from these will be managed.

For some schemes additional management plans may be beneficial:

Outline Port Operational Plan, typically for offshore wind farms where considerable construction activities may be focussed on a port. Being outline it allows flexibility in selecting the port at a later date.

Access Management Plan, when a project includes significant numbers of accesses that need detailed consideration at this stage. This assists by removing such voluminous detail from the Transport Assessment.

A Pre-Commencement Management Plan will be suggested where a project requires/generates significant construction traffic prior to the works commencing or significant temporary works on the highway such as accesses for surveys. An additional benefit may be inclusion of the environmental impacts that occur before the Code of Construction Practice is triggered.



Construction Traffic Management Plan (CTMP)

During the DCO process the CTMP is an important document that sets out how the applicant will access the highway network for delivery of materials and for construction associated with the NSIP. Importantly it sets out the process for managing construction traffic, which can ensure the environmental impacts do not exceed those assessed, that it complies with the sustainable transport objectives of policy and helps to reduce impacts on the local community.

The type of information the highway authority would expect to receive as a minimum would include:

- The elements of the works that will be subject to the CTMP
- Information on the site's access arrangements including cross reference to the environmental impacts such as vegetation removal
- Construction phasing
- Construction traffic numbers
- Construction traffic routeing
- ALL routeing
- Staff sustainable travel initiatives
- Controls, monitoring and reporting mechanisms, reflecting assessed impacts
- Enforcement of controls
- Responsibilities
 - Traffic management measures and the duration of traffic management
 - Safety measures
 - Closures of any carriageway or footways
 - Temporary Traffic Regulation Orders

This information should be accompanied with drawings showing Temporary Traffic Management proposals, Traffic Management phasing plans and any speed reduction extents. It is considered sensible that a Draft CTMP is discussed with SCC prior to submission.

It is also considered that the CTMP should appropriately address the meaning of the term 'maintenance' to define the implications of vehicle movements generated.

² LGVs are defined as vehicles under 3.5 tonnes used for work purposes (not including private cars used get to and from site).

Travel Plan (TP)

During the DCO process, the TP can be a combined document with the CTMP for simpler projects or separated. SCC provides guidance for Travel Plans and Parking. The Travel Plan should identify the following:

- Car and Light Goods Vehicle (LGV)² movements to and from the site (clarity is required whether LGVs will be included within the car share ratios, mini-buses included in 'LGV numbers')
- Staff movement to and from the site, based on total numbers of vehicles and compliance with shift patterns (including movements outside shift times and car share ratio)
- Information on complaints received on transport related issues including parking
- Commitment to report the car park survey outputs to the relevant authorities
- Sustainable transport options and how their use can be optimised

Mitigation Hierarchy

Mitigation and compensation measures (including financial compensation) for residual adverse impacts during construction and operation.

Project promoters are expected to follow the mitigation hierarchy, as set out in the Glossary of NPS EN-1. This requires avoidance and minimisation of adverse impacts on the highway; and where this is not possible, any temporary or permanent loss of access and amenity, due to the construction or operation of new infrastructure will need to be mitigated and compensated for, through the development of alternative routes, and/or improvement to the existing highway network.

It is the Council's clear preference that adverse impacts on the highway should, in all cases, be fully mitigated and compensated for with embedded mitigation as part of the project design. However, where this is not possible, financial compensation will be required.

1.4 Highway Boundary

NSIPs can result in exceptionally large requests for highway boundary information, as a result advanced notice and consultation with Suffolk County Council is recommended to reduce any potential delay.

Any access required to facilitate development, including that for safe visibility, has to be either within highway or on land within the applicant's control.

The highway authority will not accept a scheme for an access which does not evidence control of the necessary land.



A plan to confirm the extents of highway land, including public rights of way should be submitted with any scheme as detailed above. The highway boundary information can be obtained from the highway boundary team at HighwayRecords@suffolkhighways.org

Failure to do so has been found to leave gaps between the land controlled by the applicant and the highway boundary, challenging delivery of highway works.

1.5 Link Sensitivity

The methodology for determining link sensitivity should be discussed with the LHA during pre-application. In principle, however, the IEMA Guidelines for the Environmental Assessment of Road Traffic are recognised as an appropriate method. Care is required to ensure these reflect the characteristics of the network in a local context, for example absence of pedestrian facilities should not imply that no pedestrians use the highway.

1.6 Site Accesses

The LHA cannot accept a scheme for an access or any other works without evidence that it can be constructed either within the highway and/or within land in the control of the applicant (i.e. within the redline of the DCO). Whilst generic layouts have some use, the applicant should also consider the nature of the existing road particularly bends, crests, drainage features, utilities buildings and vegetation.

The potential effects resulting from new accesses (and internal haul routes) on landscape features (such as trees and hedgerows), ecological and cultural heritage assets need to be fully assessed (including those that may be affected by the

proposals and are located outside the DCO boundary) and avoided and minimised as far as possible. Where adverse effects cannot be avoided or further minimised, mitigation and, if necessary, compensation will need to be secured through the appropriate control documents, such as the Outline Landscape and Ecology Management Plan (OLEMP) during the Examination, and the detailed LEMP post-consent.

As a general rule, any highway works that are likely to remain in place for more than 5 years will be treated as permanent in terms of design and consenting process unless otherwise agreed in consultation with the LHA.

Visibility Splays

Applicants should be mindful of the tensions between guidance for visibility splays. The [DMRB](#) and [MfS](#) are useful starting points, the former for rural high speed roads and the latter for urban low speed streets. The [Suffolk Design: Streets Guide](#) (2022) Appendix F (MfS Position Statement) provides additional detail.

Where speed data is unavailable, SCC would expect the applicant to design on the 'posted' speed limit albeit, where speed limits are present, care should be taken that drivers comply with these.

The preference is to use speed survey data to determine safe visibility dimensions using DMRB or MfS calculated stopping distances.

The applicant may wish to employ temporary speed limits, for example to reduce the loss of roadside vegetation, applying the mitigation hierarchy. SCC would welcome and support this in principle. However, where temporary speed limits are proposed to reduce the visibility distance, the applicant must evidence how compliance with such limits can be achieved without calling on additional police enforcement.

In all cases any departures from visibility specifications must be agreed with the LHA prior to application of the DCO.



1.7 Highway Works

Any access or works relating to the construction/delivery of infrastructure that take place within or below the highway will need approval from the highway authority.

It is important to note that different roads fulfil different functions, and accordingly the design and delivery of highway infrastructure including accesses should not be approached on the basis that 'one size fits all'.

When considering the delivery of NSIP associated infrastructure, account should be taken of the function of the route on which a planned access or other improvement is to be delivered.

The intention is to ensure that highway works are carried out that are 'fit for purpose' and consider the function and nature of the route within the context of the duties imposed by the [Traffic Management Act 2004](#), which places a duty on Local Authorities to keep traffic (including pedestrians) moving. There is particular concern about the operation of the Strategic Route Hierarchy Road network and Primary Routes, which will need to be managed during the delivery of schemes.

Where appropriate all physical works must be compliant with the [Equality Act 2010](#) and the guidance given in the DfT document [Inclusive Mobility](#).

Information for Technical Review

An NSIP may require works to be undertaken to the highway and these may be temporary or permanent. The applicant should prepare detailed design drawings for the highway works associated with the development. These proposals should be submitted to the highway authority for technical review and must include the following:

- Detailed Engineering Layout Plans to an appropriate scale (ideally either 1:250 or 1:500) on a detailed topographical survey base model.
- The topographical survey must be of a standard suitable for detailed design and construction (not just for planning permission or preliminary design).
- The package of detailed design plans may include (where applicable):
 - General Arrangement
 - Site Clearance (including existing vegetation to be removed, based on tree and hedgerow surveys)
 - Safety Fencing and Vehicle Restraint System (VRS)
 - Drainage
 - Levels Layout (including contours plan)
 - Earthworks
 - Pavement Construction/Carriageway Surfacing
 - Kerbs, Footways and Cycleways
 - Traffic Signs and Road Markings (including Signage Schedule)

- Traffic Signals
- Street Lighting and Electrical Works
- Existing Utilities and details of proposed diversions
- Landscaping
- Swept path analysis (Auto track runs)
- Visibility splays at junctions
- Extents of proposed Traffic or Temporary Regulation Orders (TRO / TTRO)
- Third party consents when required for the highway forks (e.g. land drainage consent)

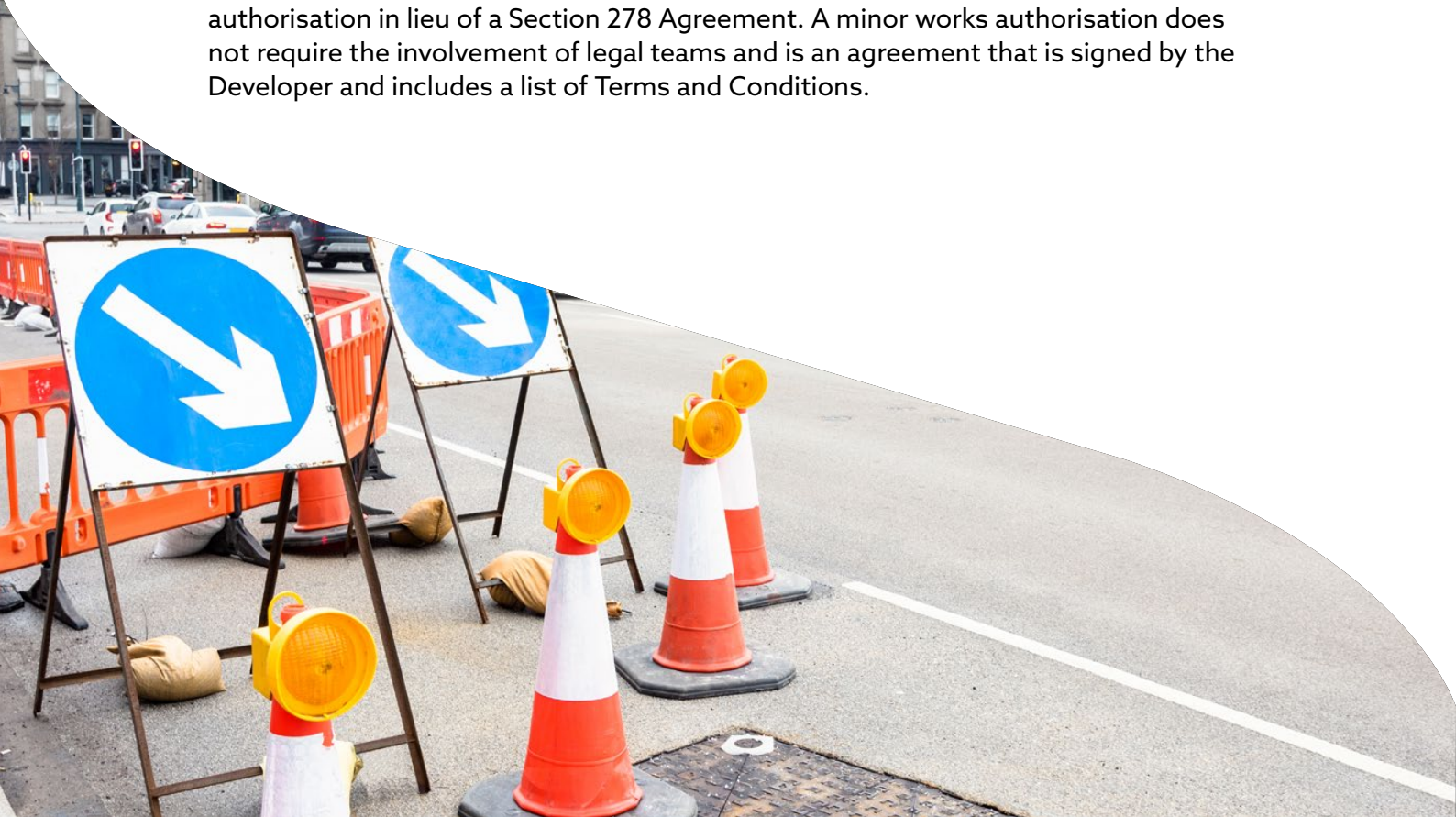
Delivery of Works

The highway works shall be delivered by a Highway Works Agreement (HWA) (i.e. a Section 278 agreement or, at the discretion of SCC, a Minor Works Authorisation). The agreement will be needed over and above the granted DCO and should be referenced in the appropriate chapters of the DCO/and or the Statement of Common Ground as the appropriate mechanism for the delivery of highway works. Alternative delivery mechanisms should be avoided since they will depart from SCCs standard operating procedure and lead to delay.

As part of the delivery of works a Project Engineer will be assigned. They will act as the focal point for all responses and coordination within SCC across the highways service. All communication between the developer and SCC should be through the assigned Project Engineer so that they can maintain a holistic view of the project.

Minor Works Authorisation Agreement

In some instances, for minor works the Project Engineer may consider a minor works authorisation in lieu of a Section 278 Agreement. A minor works authorisation does not require the involvement of legal teams and is an agreement that is signed by the Developer and includes a list of Terms and Conditions.



Section 278 Agreement

Section 278 Agreements, as a minimum, will require:

- Securing of a bond to ensure that third party funds are available to complete the highway works to the satisfaction of the County Council
- Payment of the County Council's works inspection fees, maintenance fees, special order fees, supervision fees and any other such fees as the County Council shall require
- Payment of the County Council's legal, administrative and other fees and disbursements associated with the drafting and completion of the HWA
- Preparation and advance approval of works drawings and traffic management measures
- Certification and maintenance of the highway works
- Regulating of the issue of the Works Licence to enable the Highway Works to be carried out
- The securing of a bond relating to both [Land Compensation Act 1973](#) matters and Noise Insulation Regulations 1975 as amended by the [Noise Insulation \(amendment\) Regulations 1988](#) (SI 1988/2000) and any other indemnity and bonds for liability issues as the County Council shall require
- The dedication of land as public highway (where required)
- The standards and procedures for carrying out the Highway Works; and
- Traffic regulation orders and statutory processes

The applicant will be expected to prepare the detailed design for the works. The design will need to be checked by the highway authority and may require alterations to achieve technical approval. The technical approval process normally has a minimum timescale of 6 months.

Safe methods of construction and traffic management must be considered by the designer, and the Construction (Design & Management) Regulations 2015 complied with where applicable. Early contractor involvement in the design process is strongly recommended.

For most schemes, the applicant will arrange construction of the works, which should be undertaken by a Suffolk County Council approved contractor in accordance with the approved drawings and under the supervision of Suffolk County Council staff.

Full details on the elements required for a HWA submission, including design requirements, processes, fees and timescales, are set out in SCC's website.

1.8 Movements

Heavy Goods Vehicles

For advice from the Local Highway Authority on HGV routes, please refer to Suffolk County Council's [Recommended Lorry Route Network Map](#).

For DCO's there is general acceptance that this term includes all vehicles in excess of 3.5 tonnes laden weight.

Normally, SCC will expect routing and timing of HGVs to be secured in the DCO through the CTMP. Where HGV volumes are significant or the applicant has made assumptions that cannot be evidenced SCC would also require caps on movements.

Abnormal Indivisible Loads (AIL)

For movement of AILs, there is the necessity for early liaison with the relevant highway authority's structures team to ensure that all necessary surveys, assessments and where relevant strengthening of structures can be completed before movement of such loads are required.

As a minimum, SCC expects applicants to show a feasible route from a point of origin (SRN or Port) and the site. Such route study should identify the largest load required and consider matters such as structural capacity of bridges and swept paths. The latter must be within the highway boundary or the order limits to avoid oversailing of third-party land.

Further information on special categories can be found in the Special Types Enforcement Guide published by the Driver and Vehicle Standards Authority.³

Worker Movements

Movements should be clearly set out in the relevant sections of the application together with all assumptions made in calculating these, preferably with supporting evidence. In particular, vehicle occupation ratios should be supported by evidence from other similar projects.

Particular care should be taken on relying on shift patterns that presume movements are outside network peak hours. How this can be monitored and controlled will need to be documented to give assurance that this mitigation would be effective. Care should also be taken where projects in close proximity rely on the same mitigation as this may create a different network peak.

Details of how sustainable transport can be optimised for workers together with provision of infrastructure needed to support this needs to be set out in the management plan. On site parking provision and measures to prohibit 'fly parking' shall also be included.

1.9 Protective Provisions or Highway Agreements

It has been commonly accepted in recent DCO's that SCC will secure either Protective Provisions or a Highway Agreement with the Applicant to ensure that its role as Local Highway Authority is protected.

This shall be drafted to allow SCC to recover reasonable costs including but not limited to:

- Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway
- Visual and structural condition surveys of the highway and contributions towards structural repairs to HGV routes
- Surveys and assessment of highway structures to facilitate AIL movements
- Damage to the highway (in accordance with the provisions of Section 59 [Highways Act 1980](#))
- Creation of temporary traffic regulation orders (including SCC consultation and issue of permits)
- Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements and reviewing conditions of highway structures
- Technical approval and inspection of highway accesses and payment of bonds or sureties
- Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PRoW Strategy etc)
- Payment regime for the above

Any agreement or provision shall include an indemnity for the local highway authority against losses which may be incurred. The LHA considers, as a matter of principle, an indemnity ought to be provided. Indemnity covers loss incurred because of, for example, the construction or maintenance of highway works. SCC is of the belief that those responsible for the loss should be responsible for its cost, rather than placing the higher financial burden on the LHA. It is essential the indemnity covers third party claims.

Sources of further information

Planning Inspectorate

- Overview of the NSIP process: www.gov.uk/guidance/nationally-significant-infrastructure-projects-and-the-people-and-organisations-involved-in-the-process
- Advice for Local Authorities: www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities

Suffolk County Council

- Information about the Council's energy infrastructure policy and strategic engagement with Government: www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf
- Public Rights of Way and Green Access Supplementary Guidance Document: www.suffolk.gov.uk/asset-library/prow-greenaccess.v4.pdf
- Overview of NSIPs in Suffolk and where SCC publishes its Relevant Representation's and Local Impact Report's: www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects/nationally-significant-infrastructure-projects-nsips
- PPA guidance: www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf

Contact

If you have any queries arising from this guidance, please contact Suffolk County Council's NSIP team at nsips@suffolk.gov.uk

