

Ilketshall St Andrew Parish Council's response to OPD Energy's Cable Route Proposal written in support of their Planning Application DC/25/2109/FUL

1) The cable route choice is not justified, nor is its method.

The applicant proposes trenching along narrow rural lanes without providing evidence that they have looked at alternative routes or methods. The assumption is made that the cable must be trenched in the highway as if it were the only possible means of getting it from A to B. Options, such as off-road routes across farmland and moling rather than trenching, do exist and they should, at least, be explored.

Parish objection: The applicant has failed to demonstrate that trenching the cable through narrow residential rural roads is the least harmful option. Alternative off-road routes and methods, commonly employed elsewhere, do not appear to have been properly considered.

2) The (Cable Route) document is lacking the detail necessary to properly assess the project's potential impacts, e.g.

- It repeatedly states that constant access to the properties along the route will be provided, yet, with trench widths just over a metre and current road widths of less than 3mtrs along Tooks Common Lane and Clarkes Lane, it is difficult to understand how vehicles with widths of 2mtr+ (and lengths in excess of 3mtr) will be able to get in and out of driveways – even if the trench is dug partly on the verge.

- There doesn't appear to be any reference to hand digging where key infrastructure services cross the roads on the proposed route (e.g. water mains, drains, electricity cables, phone and internet cables, culverts). It is difficult to understand how damage to all, or any, of these can be avoided by the exclusive use of the trench cutting method proposed.

- There is little detail surrounding the Local Liaison Officer the applicant proposes to appoint. Where will they be based? How accessible will they be? When, and how, will they be contactable? What authority will they have to stop, or change, the programme?

Parish objection: The applicant has not given sufficient detail to properly evaluate the operational aspects of their proposal

3) The suggested diversions around Tooks Common Lane and Clarkes Lane are too narrow to be fit for purpose.

- All the proposed diversion routes (i.e. Hall Road/Banters Lane, Mill Lane, Great Common Lane, and School Road) are less than 3mtr wide in places and rarely do they exceed 3.2mtrs. Many stretches have ditches running alongside them and there are many blind bends (particularly in the summer when the hedges are full of leaf). Passing opportunities are limited and only viable when verges are wide (and dry) enough to allow it. There are obvious risks of collision and gridlock here, not to mention damage to verges

4) Ringsfield Road is only 4.1mtr wide in places and it too has some dangerous bends (notably in what is known locally as 'Brown Trousers Corner' where a fatality occurred a few years ago). It is also already used by a significant number of HGV's travelling between the A144 and the industrial areas of Beccles. To have traffic approaching, queuing and stacking at multi way signal points along these stretches while cabling is in progress does not make sense. There is an obvious risk of collision, verge destruction, and even conflict between motorists should they find there is insufficient room to pass each other safely.

Parish objection: On the Ringsfield Road section of the proposed cable run the proposal introduces prolonged construction traffic and road narrowing on a highway that is already below safe operational width, creating unacceptable safety and operational impacts. On the Tooks Common Lane and Clarkes Lane sections it will divert two way traffic onto single track roads that are incapable of safely accommodating the increased usage.

5) The Tooks Common Lane and Clarkes Lane closures will involve significantly longer rural diversions and impact on emergency access, delivery and care access, school transport, and farm vehicle routing (particularly around harvesting time).

Parish objection: The applicant understates the real impact of rural road closures on an isolated community with unsuitable alternative routes.

6) The construction programme assumes continuous progress and makes little (or no) allowance for ground complications, weather delays or utility clashes.

Parish objection: The application provides optimistic construction times with no allowance for the delays that evidence has suggested are common in rural trench works. We would like the applicant to provide a more pragmatic scenario that incorporates these 'reasonable to expect' delays.

7) The risk of road and verge damage is understated. Heavy plant and trenching on these small rural roads could cause verge collapse, edge failure, surface cracking, potholes

and drainage problems. The plan only promises repairs after works, but damage often appears months later when the responsibility becomes diluted.

- The applicant omits to mention that the verges along Tooks Common Lane and Clarkes Lane are a central part of the St Andrew and St John's Commons that are a County Wildlife Site due, in a large part, to the floral diversity of the commons and road verges. These soft road verges accommodate a large variety of plants and wild flora, creating an important habitat for many animal species - invertebrates, insects, mammals, birds, amphibians and reptiles. Merely digging a trench into the verge will alter the structure and ecosystem of the ground, disturbing the fungi, plants and microbiology within it. Furthermore, refilling the trench with imported 'dust' will certainly destroy the biodiversity of the soil. The applicant should note too that any work on the commons' verges would need approval under section 38 of the Commons Act 2006.

Parish objection: The roads are structurally unsuitable for sustained construction traffic and trench reinstatement which often fails prematurely and leaves long-term repair and maintenance burdens. We request that the applicant provides independent surveys, long-term bonds for repairs (including potholes), multi-year monitoring and a commitment to obtaining the permissions required under Section 38 of the Commons Act 2006 before beginning any trenching work along Tooks Common Lane and Clarkes Lane.

8) Tooks Common Lane and Clarkes Lane are designated Quiet Lanes which are widely used by pedestrians, cyclists, dog walkers, children and the many horse riders we have in and around the village. Temporary signals and closures create frustrations and potential conflict points between these users and vehicles, and the applicant only proposes using signage and the reporting of offenders during working hours as a means of traffic control. It is obvious too that aggressive behaviour will be most likely occur along the diversion routes (which are also Quiet Lanes) where no policing is either proposed or practical on a 24/7 basis

Parish objection: Safety mitigation is not robust enough and relies too heavily on signage and drivers behaving benevolently.

9) The disruption to the Parish is disproportionate to the benefit it will receive. We will bear the construction burden but get no visible improvement in return

Parish objection: The impact of the proposed cable route is heavily disproportionate to the benefit we will receive from it