

# SUNNICA ENERGY FARM

EN010106

Volume 8

8.44 Applicant's Response to Local Impact Report – Response to  
Annex E and Annex F

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009



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**The Infrastructure Planning  
(Applications: Prescribed Forms and  
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## **Sunnica Energy Farm**

### **8.44 Applicant's Response to Local Impact Report – Response to Annex E and Annex F**

<b>Planning Inspectorate Scheme Reference</b>	EN010106
<b>Application Document Reference</b>	EN010106/APP/8.44
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<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 00	28 November 2022	Deadline 3A Submission

## Applicants comments on LIR Transport (Highways) (Chapter 13)

LIR Summary Reference (Para)	Summary of LIR Comment	Applicant's Response to LIR
Annex E	Transport – Site Accesses Review	
E.1	Information Request	<p>The approach to visibility is set out under the response to E.2 below, as it is not appropriate to require substantial levels of vegetation clearance to provide full standard visibility for temporary accesses, due to environmental impact, where temporary traffic management can be included to ensure safe and suitable access. Other points in relation to design information are set out in response to Chapter 13 points 1g to 1w. The level of information available is proportional to the stage of the project with detailed design of the site accesses to be provided at a later stage, prior to construction. The detailed design of site accesses is required to be submitted for the approval of the relevant planning authority prior to the commencement of the project in accordance with requirement 6 contained in Schedule 2 to the draft DCO.</p> <p>Notwithstanding this, the Applicant had recognised in the video conferencing meetings held in April, July and October 2022 the comments raised by the Local Highways Authorities around the site access information. The Applicant has been discussing these matters with the LHAs through a series of meetings, with the aim of reaching agreement on the site access proposals. A further meeting is scheduled for 24/11/22 to go through each of the site access proposals with the outcomes of discussion intended to be reported within the relevant Statement of Common Ground.</p> <p>A draft set of site access drawings has been prepared and provided to the LHAs. The set of drawings provided to the local highway authorities are to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] that the Applicant proposes to submit at Deadline 3A. They include:</p> <ul style="list-style-type: none"> <li>• Scale provided on each individual site access drawing;</li> <li>• North arrow on each individual site access drawing;</li> <li>• Street names;</li> <li>• Overall access plan;</li> </ul>

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		<ul style="list-style-type: none"> <li>• Identified if the base mapping is either topographical or Ordnance Survey (OS);</li> <li>• On-site measurements recorded during site visit on appropriate drawings;</li> <li>• Swept path analysis for vehicle types including large cars, HGVs, a 1000T crane and a 46.63m AIL;</li> <li>• Indicative site access layouts including dimensions;</li> <li>• Visibility splay for the main staff access during the operational period;</li> <li>• Summary of the site access use during the construction period in terms of HGVs;</li> <li>• Reference made to the Traffic Regulation Measures (TRMs);</li> <li>• Include the Order Limits; and</li> <li>• Identified Highway Works on Elms Road and La Hogue Road. To accommodate two-way HGV movements</li> </ul> <p>The temporary traffic management (temporary traffic signals and temporary speed limit reductions) [REP2-007 to REP011] as well as a signage strategy are proposed to be implemented during the construction period to provide safe entry and egress of the site accesses. Speed surveys were carried out at the request of the local highway authorities to understand the existing speeds of vehicles along the highways which provide access to the site accesses. These are identified in the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] along with the proposed temporary speed limits. Therefore, the purpose of the temporary traffic signals and speed limit reductions for individual site accesses during the construction phase is to provide safe access and egress for HGVs in/out of the site access. The temporary traffic signals and speed limit reductions are applied where the full visibility splay was unable to be achieved without significant vegetation trimming or removal. Appropriate warning signage will be provided on the approaches to the temporary traffic signals which will assist in reducing vehicles speeds past the site accesses.</p> <p>In addition, the full visibility splay will be provided at the main staff car parks, as these will be in regular use during the operational phase.</p> <p>A Stage 1 Road Safety Audit was undertaken for the Newmarket Road site access located between the A11 and Golf Links Road at the request of the local highway authority. Consultation was also undertaken with National Highways to agree to the use of the</p>

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		<p>A11/Newmarket Road junction for development related vehicles, with development related vehicles only permitted to turn left in / left out at the junction. It is not considered necessary or appropriate at this stage of the project to undertake Stage 1 Road Safety Audits at every site access. However, the Stage 1 Road Safety Audit was carried out at the request of the local highway authority and the results are provided within Annex E of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013]. The Stage 1 Road Safety Audit was carried out to the DMRB GG119 guidance's and identified that a signage strategy should be provided to warn motorists of the construction site access which is located on Newmarket Road. The Applicant is committed to providing the signage strategy in line with the recommendations within the Stage 1 Road Safety Audit. The achievable visibility splay of the proposed site access will be presented within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan at Deadline 3A. In addition, National Highways have agreed to development related vehicles using the A11/Newmarket Road junction, with development related vehicles only permitted to turn left in / left out at the junction.</p>
E.2-E.5	Visibility Requirements	<p>The temporary traffic management identified within the Traffic Regulation Measures Plans [REP2-007 to REP2-011] (which were updated at Deadline 2 to reflect a minor contraction of the Order limits) identify the proposed access strategy for the site accesses. The provision of the temporary traffic signals and speed limit reductions are in-lieu of providing the full visibility splays as this could result in excess vegetation loss which would be inappropriate and not in proportion to the timeframe the site accesses are proposed to be used during the construction period. The site access drawings will be updated as part of the next iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant proposes to submit at Deadline 3A.</p> <p>This will ensure safe and suitable access for all the construction access points. The visibility splay for a 60mph (215m x 2.4m) road will be provided at the two main staff car park site accesses on Elms Road and La Hogue Road, which are to be provided throughout the operational phase and will be provided in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant proposes to submit at Deadline 3A.</p> <p>The Applicant notes the advice provided on visibility standards.</p>

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E.6-E.7	Road Widths	<p>The site access drawings which are provided in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301 the Applicant to submitted at Deadline 3A, identify sections of Elms Road and La Hogue Road to be widened up to 7.2m width is based on swept path analysis of two HGVs passing another. Further response is provided below in response to paragraph E.8 to E.9. The swept path analysis of the two 16.5m articulated HGVs passing one another takes into consideration the passing of wingmirrors, local characteristics such as the verge, vegetation, trees and telephone poles as well as on site observations when identifying the locations of highway works along Elms Road and La Hogue Road,. The areas of highway works are identified within the Order Limits.</p> <p>Paragraph 7.2.14 of the F-CTMP &amp; TP [REP3-013] identifies that the Applicant will undertake highway conditional surveys before, during and after the construction to identify any impacts which are a result of the Proposed Development that need to be remediated. The exact roads are to be agreed with the local highway authorities in advance of construction.</p>
E.8-E.9	Access Width	<p>The site accesses proposed to be used during the construction period have been based on swept path analysis of a 16.5m articulated HGV and the widths are a minimum of 6m, which includes those are labelled as 'secondary accesses' as they are required to accommodate a 16.5m articulated lorry. An update to the swept path analysis is provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant proposes to submitted at Deadline 3A .</p> <p>It is correct that the access widths are based on a single vehicle movement. This is appropriate as to design for multiple movements to occur simultaneously would result in a greater level of environmental impact which is above and beyond a reasonable worst-case scenario, particularly in terms of vegetation clearance. Accesses and deliveries will be managed appropriately with the aim of avoiding movements occurring simultaneously.</p> <p>As set out in paragraph 7.2.2 of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] a Delivery Management System will be implemented to control bookings of HGV deliveries from the start of the construction period. This will be used to effectively plan all HGV deliveries in accordance with the construction programme, regulate the flow of HGVs via timed delivery slots and monitor compliance of HGV routeing. This will ensure that movements will not occur simultaneously.</p>

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		<p>Data on forecast peak HGV usage of accesses during construction is included in Table 6-3 of the Transport Assessment [APP-117]. It is noted that the number of HGVs forecast for each cable route access is not provided. However, it is set out at 5.4.20 in the Transport Assessment that a maximum of 23 HGVs is forecast across all cable route accesses, demonstrating a low level of usage. Furthermore, at the peak of the construction phase, the largest number of HGV movements at any one access point will be 48 per day at Sunnica West Site A: Access A This represents a low number, meaning that simultaneous movements at access junctions are both unlikely and will be managed appropriately. In practice, in the highly unlikely event that two vehicles reach the access at the same time, the outbound vehicle will wait in the site for the inbound vehicle to pass. This means that the inbound vehicle will not need to wait in the highway. The Applicant will add further clarification on this point to an updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] that the Applicant proposes to submit in deadline 3.</p>
E.10-E.11	Internal Arrangements	<p>Indicative layouts of the construction staff car parks are provided within Chapter 5 of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013]. The internal access routes are identified on Figure 3.1 [APP-135] and Figure 3.2 [APP-136] and movements on these would occur outside of the local highway network.</p> <p>The internal haul road leading to Sunnica East construction staff car park allows for circa 400m of internal queuing of construction staff vehicles (circa 70 vehicles). This excludes the internal queuing within the car park itself. The internal haul road leading to Sunnica West construction staff car park allows for circa 200m of internal queuing of construction staff vehicles (circa 35 vehicles). This excludes the internal queuing within the car park itself. Thus there will be substantial space within the site to allow for any queuing into the car park areas to be managed. In addition, the two construction staff car parks will be managed during the arrival and departure of construction staff to minimise the queueing of construction staff vehicles on the local highway network.</p> <p>The internal site layout in the vicinity of each access is a matter for detailed design. All vehicles required to enter and leave the site from/to the public highway will do so in a forward gear, with any turning movements required being undertaken within the site and there is sufficient space within the Order limits to provide this.</p> <p>The level of information provided at Annex C of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] is proportional to the stage of the project. Detail on the positioning of gates and any other associated barrier control will be part of the</p>



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		detailed design submission post-DCO Examination and prior to construction, as is typical of the design process. This will ensure that there is sufficient space provided within the site for vehicles to clear the highway while gates are being opened. Gates will be located within the site on land within the Applicants control. The F-CTMP/TP submitted at Deadline 3A has been updated to provide greater clarity and certainty on points relating to internal site layout set out in this response.
E.12-E.13	Drainage	<p>The information provided at Annex C of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] is proportional to the stage of the project with detailed design of the site accesses to be provided prior to construction of the site accesses and appropriate information will be provided regarding drainage details.</p> <p>The LHA references mud being carried from the quarry by HGVs. The Applicant has not been made aware of this concern through its extensive engagement with the LHAs, nor can the Applicant comment on the adequacy of HGV management measures in a project which it is not involved in. A commitment is made by the Applicant to provide hard standing surface at the site accesses and wheel washing facilities, within Chapter 7 (paragraph 7.2.17) of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] to mitigate the risk of material migrating into the highway.</p>
E.14-E.19	Comments on Individual Accesses Sunnica West Site A: Site Access A on La Hogue Road	<p>It should be noted that this access is in the location of an existing site access opposite the farm shop. The full visibility splay will be provided during the construction and operational phase of the scheme within the Order limits and is shown in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant submitted at Deadline 3A. The construction staff will arrive on site before 7am and leave site after 7pm, as per paragraph 7.2.26 in the Framework Construction Traffic Management and Travel Plan [REP3-013]. This is outside of the opening hours of the farm shop, and therefore there will be minimal interaction between traffic using the site access and traffic using the farm shop during the construction period.</p> <p>It is noted the comment made regarding the provision of the visibility splay on the loss of hedgerow. This has been assessed from a Landscape and Ecology perspective in the Environmental Statement [APP-40].</p> <p>As previously stated, the Applicant has noted comments from the LHAs regarding the information provided in the site access plans. A draft set of site access drawings has been prepared and provided to the LHAs. The set of drawings provided to the local highway</p>



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		<p>authorities are to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A. A further meeting was held on 24/11/22 to discuss each of the site access proposals with the outcomes of discussion intended to be reported within the relevant Statement of Common Ground.</p> <p>Other points in relation to design information are set out in response to Chapter 13 points 1g to 1w. The level of information available is proportional to the stage of the project with detailed design of the site accesses to be provided at a later stage, prior to construction. The detailed design of site accesses is required to be submitted for the approval of the relevant planning authority prior to the commencement of the project in accordance with requirement 6 contained in Schedule 2 to the draft DCO.</p> <p>The radius has been identified based on the swept path analysis of a 16.5m articulated HGV and a 46.63m AIL. Therefore, it is considered the radius to be appropriate for the purpose of use. The radius to the north of the junction is not proposed to be modified as large vehicles will not be required to access from the north of La Hogue Road as this is not on the HGV route identified within, and secured by, the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].</p> <p>The swept path analysis of two-way vehicle movement at the staff car parks is provided in the iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant proposes to submit at Deadline 3A.</p>
E.20-E.24	<p>Comments on Individual Accesses</p> <p>Sunnica West Site A: Site Access B on Chippenham Road</p>	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design. The larger radius' have been identified as these are required to accommodate the 16.5m articulated HGV to enter and egress the site accesses. The 'small' radius' (which is assumed to reference those radii under 6m) have been identified as HGVs are not required to access from the opposite direction as these are not on the HGV routes identified within the Framework Construction Traffic Management Plan and Travel Plan [REP3-013]. The temporary traffic management identified within the Traffic Regulation Measures Plans – Temporary Measures [REP2-007 to REP2-011] identify that the site</p>

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		<p>access will be managed by temporary traffic signals to permit entry and egress of the site access in a safe and controlled manner therefore mitigating the potential obstruction of visibility.</p> <p>The Applicant has committed to wheel washing facilities to prevent mud or material being tracked onto the local highway network as detailed in paragraph 7.2.17 of the Framework Construction Traffic and Management Plan and Travel Plan [REP3-013].</p>
E.25-E.29	Comments on Individual Accesses Sunnica West Site A: Site Access C on Dane Hill Road	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design. The HGV routes are identified within the Framework Construction Traffic Management Plan and Travel Plan and therefore the radii are based on the swept path analysis of HGVs following the routes identified. HGV management measures for HGVs are also provided within that document.
E.30-E.33	Comments on Individual Accesses Sunnica West Site B: Site Access D on Fordham Road	As previously stated, the Applicant has noted comments from the LHAs regarding the information provided in the site access plans. To aid discussions, the Applicant has prepared a package of site access drawings which will supersede Annex C of the F-CTMP/TP [AS-300, AS-301], which will be submitted at Deadline 3. A further meeting was held with the LHAs on 24/11/22 with the aim of addressing residual issues on the subject of the site access plans. The comments made in E.30 to E.33 have been addressed in the iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant submitted at Deadline 3A.
E.34-E.36	Comments on Individual Accesses Sunnica East Site B: Site Access A on Elms Road	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design. Measures for the management of the site accesses and HGVs are set out in the Framework Construction Traffic Management Plan and Travel Plan. Sunnica East Site B: Site Access A on Elms Road is not a car park access for construction staff.
E.37-E.38	Comments on Individual Accesses	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to

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	Sunnica East Site B: Site Access B on Elms Road	<p>design at this stage and detailed design. The purpose of the temporary traffic signals and speed limit reductions for individual site accesses during the construction phase is to provide safe access and egress for HGVs in/out of the site access. The temporary traffic signals and speed limit reductions are applied where the full visibility splay was unable to be achieved without significant vegetation trimming or removal, in order to limit environmental impact. Appropriate warning signage will be provided on the approaches to the temporary traffic signals which will assist in reducing vehicles speeds past the site accesses.</p> <p>The existing gate at the site access will be removed in order to provide the site access arrangements which are identified within Annex C of the Framework Construction Traffic Management Plan and Travel Plan which was updated in the iteration the Applicant submitted at Deadline 3.</p>
E.40-E.44	Comments on Individual Accesses Sunnica East Site B: Site Access C on Elms Road	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design. The Traffic Regulation Measures Plan – Temporary Measures[REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals and temporary speed limit reduction along Elms Road along with a signage strategy to warn motorists of the upcoming temporary traffic signals and construction site access. .</p> <p>Further clarification regarding the site access regarding the size of the site access required to accommodate the required vehicles and is provided in the iteration of the Framework Construction Traffic Management Plan and Travel Plan the Applicant to submitted at Deadline 3A. As previously stated, the Applicant has noted comments from the LHAs regarding two-way movements along Elms Road and highway works to provide two-way HGV movements have been proposed and set out in the Transportation Technical Note [REP2-041] submitted at Deadline 2. These works are indicated within the updated F-CTMP..</p>
E.45-E.48	Comments on Individual Accesses Sunnica East Site B: Site Access D on C610 Newmarket Road	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] that the Applicant proposes to submit at Deadline 3, and a summary of the position in relation to design at this stage and detailed design. The</p>

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		<p>potential discrepancy raised in E.48 will be investigated, and the F-CTMP/TP site access drawings will show the correct location. An indicative amount of vegetation clearance is shown within the site access drawings which are included within the the Framework Construction Traffic Management Plan and Travel Plan that the Applicant proposes to submit at Deadline 3A.</p> <p>The Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP-011] identifies that it is proposed to include temporary traffic signals and temporary speed limit reduction along Newmarket Road along with a signage strategy to warn motorists of the upcoming temporary traffic signals and construction site access. This addresses the request for traffic management in E.47.</p>
E.49-E.55	Comments on Individual Accesses Sunnica East Site A: Site Access E on Ferry Lane (Formerly Freckenham Road)	<p>The site access E located on Ferry Lane (Freckenham Road NSRN 14601046) is proposed to be used during the construction, operational and decommissioning phases. During the construction period the site access will be used by HGVs, during the operational period the site access will be used by the occasional staff for maintenance for accessing the substation purposes and during the decommissioning period the site access will be used by HGVs.</p> <p>The swept path analysis has been provided for a 16.5m articulated HGV from the direction of travel which is identified on the construction routes. Therefore, vehicles would not use the northern part of the triangular access. The site access will be managed throughout the construction phase therefore removing the requirement for two-way HGV movements, with management measures set out in the Framework Construction Traffic Management Plan and Travel Plan ].</p> <p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. This will provide clarification regarding paragraphs E.53, E.54 and E55.</p> <p>Access K located on Beck Road will be used during the construction and decommissioning periods for AIL access and for emergency access during the operational period. Site Access E will be used for access to the substation. This is identified within Figure 3 within the Framework Construction Traffic Management Plan and Travel Plan].</p>

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E.56-E.61	Comments on Individual Accesses Sunnica East Site A: Site Access F on Beck Road	<p>It is confirmed that the appropriate visibility splay in line with DMRB standards will be provided at the site access and the land is within the Applicant's control under the DCO.</p> <p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design. This will provide clarification regarding the matters raised in paragraphs E.58, E.59 and E.60.</p> <p>The Applicant has committed to wheel washing facilities to prevent mud or material being tracked onto the local highway network as detailed in paragraph 7.2.17 of the Framework Construction Traffic and Management Plan and Travel Plan [REP2-026].</p>
E.62-E.63	Comments on Individual Accesses Sunnica East Site A: Site Access G on Beck Road	<p>This is an existing site access with swept path analysis provided within the Framework Construction Traffic Management Plan and Travel Plan [REP2-026] It is not currently envisaged that works to improve Access G on Beck Road will be required, including in relation to visibility, as it is an existing access that is currently in use and the usage proposed by the Applicant (access to ecological and heritage mitigation areas (ECO1 and ECO2) within Sunnica East Site A, will not intensify its existing use.</p>
E.64-E.67	Comments on Individual Accesses Sunnica East Site B: Site Access H on C610 Newmarket Road	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design..</p> <p>The Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals and temporary speed limit reduction along Newmarket Road which includes Site Access D and Site Access H along with a signage strategy to warn motorists of the upcoming temporary traffic signals and construction site access. This removes the requirement to provide the visibility splay for the site access, and therefore the requirement for significant vegetation clearance. The updated site access drawings submitted within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, includes swept path analysis</p>
E.68-E.74	Comments on Individual Accesses	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan</p>

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	Sunnica East Site B: Site Access I on C576 Newmarket Road	<p>and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.</p> <p>The audit team initials are provided, along with their respective qualifications. The full names of the auditors will be provided to the Local Highways Authorities privately. As is clear in the RSA, notably Chapter 5, the Audit Team (Chelmsford) is separate to the design team (St Albans), and the RSA has been carried out in line with GG119. The Road Safety Team has had no other involvement in the project or Applicant other than the Stage 1 Road Safety Audit and are completely separate. Therefore, the use of an AECOM road safety audit team is considered appropriate and have the appropriate qualifications and experience to undertake the Road Safety Audit.</p> <p>A speed survey was carried out at the request of the local highway authority which recorded the speed of vehicles at the proposed construction site access. The results of the 85<sup>th</sup> percentile are presented in the Framework Construction Traffic Management Plan and Travel Plan [REP3-013-]. This identified the 85<sup>th</sup> percentile vehicles speeds to be 40mph. Therefore, the desirable minimum stopping sight distance to be 120m and the one step below desirable minimum to be 90m in Design Manual for Road and Bridges (DMRB) CD109 Table 2.10. Thus the 100m available is one step below the desirable minimum.</p> <p>The Stage 1 Road Safety Audit identified a signage strategy to be provided warning motorists of the upcoming site access which the Applicant has commented to providing. Therefore, the achievable visibility splay is above the one step below desirable minimum visibility for 40mph. It is also noted that National Highways agreed to the use of the A11/Newmarket Road junction for development related vehicles (left in and left out only). Therefore, it is considered the achievable visibility without vegetation trimming, the design of the site access to accommodate two-way HGV movements and the provision of the signage strategy as identified in the Stage 1 Road Safety Audit to be appropriate for this site access during the construction phase.</p> <p>The existing site access on Golf Links Road (Sunnica East Site B Site Access J) is proposed to be used during the operational phase and not during the construction period. Currently, the Applicant does not envisage improvements being required to this existing access to the site, due to the very infrequent use it will receive during the operational phase.</p> <p>Swept path analysis of two-way HGVs has been provided at Sunnica East Site B Site Access I on Newmarket Road (located between the A11 and Golf Links Road). Further information is provided in the updated site access drawings which will be included within the</p>

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		Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A.
E.75-E.77	Comments on Individual Accesses Sunnica East Site B: Site Access J on Golf Links Road	Sunnica East Site B: Site Access J on Golf Links Road is an existing site access, and it is currently envisaged that no additional access improvement works are required, although as a precaution the power to carry out such improvements is included in the draft DCO. No wholesale replacement of solar PV arrays is forecast, as set out in the response to paragraph 13.92 in Chapter 13 of the LIR and therefore no HGVs are forecast to use Golf Links Road during the operational phase. No material increase in the use of the existing site access is forecast during the operational phase as it will only be used for occasional maintenance requirements by staff and therefore it will not intensify the use of the existing site access.
E.78-E.80	Comments on Individual Accesses Sunnica East Site A: Site Access K on Beck Road	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design..  The site access will be used to access the substation for the purposes of maintenance during the operational phase.
E.81	Burwell National Grid Substation Option 1 Weirs Drove	The Applicant understands this to be a reference to Cable Route Access A (CR-A1 to CR-A2 on the Access and Rights of Way Plans [REP2-006]. The Applicant notes that, with the acceptance of its application to change its application for development consent, Cable Route Access was subject to a minor relocation now that it is no longer required to service the Option 1 Burwell National Grid Substation Extension. Cable Route Access A is now located at the existing access to the Burwell National Grid Substation. While it is not currently envisaged that improvements will be required to this access, the Applicant has retained the power to do so should such works be required. The detailed design of any such works would require the approval of the relevant planning authority in accordance with requirement 6 of the draft DCO.
E.82-E.88	Comments on Individual Accesses	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to



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	Grid Connection Site B: Burwell National Grid Substation Extension – Option 2 – Newnham Drove (East)	<p>design at this stage and detailed design. This provides clarification regarding E.84, E.86, E.87 and E.88. The comment in E.85 is noted.</p> <p>A low number of construction vehicles are forecast to be associated with the site access on Newnham Drove. The HGV movements along Newnham Drove will be managed, with management of HGVs set out within the Framework Construction Traffic Management Plan and Travel Plan [REP3-013]. It was agreed within a video conferencing meeting (27/08/2021) with the local highway authority that the existing vehicle movements along Newnham Drove were sufficiently low enough not to warrant undertaking traffic surveys. Therefore, it is not necessary or appropriate to provide passing places along Newnham Drove as vehicle movements will be managed, which are only forecast for a short period of time during the construction period.</p>
E.89-E.92	Comments on Individual Accesses Grid Connection Site C: Anchor Lane, Burwell	<p>Anchor Lane is approximately 100m in length. The construction vehicles associated with the site access relates to the construction of the grid connection and is forecast to be very low as set out in the Transport and Access chapter [APP-045] and Transport Assessment [APP-117] and therefore is not considered to intensify Anchor Lane.</p> <p>No weight limit is in place on the bridge in question and therefore the vehicles will be in line with the standard requirements of vehicles on UK roads which the Government sets out on their website regarding 'HGV maximum weights'.</p> <p>It would be inappropriate to change the characteristics of Anchor Lane for a very short part of the construction period which is associated with very low number of vehicles. In addition, it is an embedded mitigation measure set out within Annex C of the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] that the size of vehicle using this route will be limited to 10m box vans / panel vans, rather than the 16.5m articulated lorry used for other site accesses which is based on the swept path analysis. The Anchor Lane is an existing junction, and no highway works is proposed to change the existing visibility splay as mentioned in E.92 as it is an existing T-Junction in use on the highway network, and its use by Sunnica vehicles will be short term.</p>
E.93-E.97	Comments on Individual Accesses Grid Connection Site D: Little Fen Drove (south), Burwell	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan

LIR Summary Reference (Para)	Summary of LIR Comment	Applicant's Response to LIR
		<p>and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design..</p> <p>Little Fen Drove is only accessed to the south / south-east and therefore the construction related vehicles will not access the site access from the north / west. Therefore, no radius is provided on the western / northern side of the indicative site access layout. Little Fen Drove is also a rural road, and the site accesses will be managed given the very low traffic flow on Little Fen Drove and therefore appropriate visibility will be provided, and no widening is proposed as HGV movements will be managed appropriately to avoid two-way HGV movements.</p>
E.98-E.101	Comments on Individual Accesses Grid Connection Site E: Little Fen Drove (North), Burwell	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] that the Applicant proposes to submit at Deadline 3, and a summary of the position in relation to design at this stage and detailed design.</p> <p>Little Fen Drove is accessed from the east / south therefore construction vehicles will access the site access from the east / south and as a result no radius is shown on the indicative site access layout. Little Fen Drove is only access to the south / south-east and therefore the construction related vehicles will not access the site access from the north / west. Little Fen Drove is also a rural road, and the site accesses will be managed given the very low traffic flow on Little Fen Drove. The Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] identifies the proposed management of HGVs. The site access layout is indicative and therefore the comments in paragraph E.101 do not apply.</p>
E.102-E.106	Comments on Individual Accesses Grid Connection Site F: First Drove (off Broads Rd), Burwell	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. The site access plans included in the revised F-CTMP respond to E.102.</p> <p>PRoW surveys were undertaken which picked up vehicle movement along First Drove and identified a very low number of vehicles and Non-Motorised Users using First Drove which was outlined in the video conferencing meeting with the local highway authority on 4<sup>th</sup></p>

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		<p>October 2022. This is detailed in Section 10 of the Transportation Technical Note [REP2-041] submitted at Deadline 2.</p> <p>The HGV movements associated with First Drove is in relation to the construction of the grid connection and the vehicles movements will be managed at the site access. Vehicle numbers will be low and temporary with management of HGVs set out in the Framework Construction Traffic Management Plan and Travel Plan [REP3-013] which are further updated at Deadline 3A as responses to E.103 and E.106. There is no weight restriction identified at bridge 592688 in response to E104.</p> <p>It is noted the comment on permission from the LLFA regarding E.105.</p>
E.107	Comments on Individual Accesses Grid Connection Site G: Broads Road, Burwell	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] that the Applicant proposes to submit at Deadline 3, and a summary of the position in relation to design at this stage and detailed design.</p> <p>The Traffic Regulation Measures Plan – Temporary Measures [REP3-007 to REP3-011] identifies that it is proposed to include temporary traffic signals at site access G to ensure safe and suitable access without requirement for full visibility splays, ensuring that safe and suitable access can be provided within the Order limits.</p>
E.108	Comments on Individual Accesses Grid Connection Site H: Ness Road, Burwell (B1102) (South)	No further comment required.
E.109	Comments on Individual Accesses Grid Connection Site I: Ness Road, Burwell (B1102) (North)	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. The Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access I to ensure safe and suitable access without the need for full visibility splays.</p>
E.110-E.112	Comments on Individual Accesses	Vehicles reduce their speed at this location due to the approaching roundabout. The existing site access is proposed to be used and a signage strategy will be provided on the approach to the site access to warn motorists that HGVs could be turning into the site

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	Grid Connection Site J: A142 - Fordham By-pass, Fordham	<p>access before the roundabout which is circa 100m to the east of the site access. Therefore, it is not considered other motorists would misinterpret the vehicles turning indicator to relate to manoeuvring at the roundabout. Construction HGVs will be driven by professional drivers with appropriate licensing, who will know the routes they are taking. They will indicate in advance and will not brake suddenly. The swept path analysis provided within the Framework Construction Traffic Management Plan and Travel Plan is appropriate for the purposes of the HGV accessing the site access in terms of vehicle speeds.</p> <p>In addition, the right turns in and out of the site access will be prohibited, which is outlined in the Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP2-011], with cones or other appropriate measures to be provided to prevent vehicles from turning right.</p>
E.113	<p>Comments on Individual Accesses</p> <p>Grid Connection Site K: C145 - Newmarket Road, Fordham</p>	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. The Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access K to ensure safe and suitable access during the construction phase. The design of the traffic management will ensure that pedestrians are safely provided for, and this can be achieved within the parameters of the temporary traffic management and therefore the traffic management and the site access arrangements do account for the existing footway and likely pedestrian use.</p>
E.114	<p>Comments on Individual Accesses</p> <p>Grid Connection Site L - C145 - Newmarket Road, Fordham</p>	No further comments required.
E.115-E.116	<p>Comments on Individual Accesses</p> <p>Grid Connection Site M: C145 - Chippenham Road, Snailwell</p>	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. Therefore, this will provide clarification in relation to E.115 and E.116.</p>

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E.117-E.119	Comments on Individual Accesses Grid Connection Site N: Chippenham Road, Snailwell	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. The Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access N to ensure safe and suitable access without requirement for full visibility splays. Therefore, the suggested proposals regarding the radius are not necessary. The HGV routes and the proposed management measures of HGVs are identified within the Framework Construction Traffic Management Plan and Travel Plan.
E.120-E.121	Comments on Individual Accesses Grid Connection Site O: C145 – La Hogue Road, Chippenham	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. The Traffic Regulation Measure Plans [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access O to ensure safe and suitable access without requirement for full visibility splays and therefore the issues related to trimming of established hedges do not arise.
E.122	Comments on Individual Accesses Grid Connection Site P: B1085 (North)	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design..  The Traffic Regulation Measures Plans [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access P to ensure safe and suitable access without requirement for full visibility splays. Therefore, it is considered that the Applicant has already provided the information regarding the proposed access strategy and therefore can deliver safe and suitable access within the Order Limits
E.123	Comments on Individual Accesses Grid Connection Site Q – B1085 (South)	Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design.. The Traffic Regulation Measures Plans [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access Q to ensure safe and suitable access without requirement for full visibility splays. Therefore,

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		it is considered that the Applicant has already provided the information regarding the proposed access strategy and therefore can deliver safe and suitable access within the Order limits
E.124-E.125	Comments on Individual Accesses Cable route site access R and S (B1102 Freckenham Road)	<p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design..</p> <p>The Traffic Regulation Measures Plans [REP2-007 to REP2-011] identifies that it is proposed to include temporary traffic signals at site access R and S to ensure safe and suitable access without requirement for full visibility splays.</p>
E.126	Comments on Individual Accesses Cable route site access T (C608 Isleham Road)	<p>Site Access T on Isleham Road is an existing site access, which will only be used for a limited period for a small number of vehicles.. Swept path analysis has been undertaken and the required vehicles can enter and egress the site access safely and without any works to improve the access. As such, no changes are proposed to existing visibility due to the short term limited usage and the fact that the access is currently in place. Land outside of the public highway or Order Limits is not required.</p> <p>Please see the response to E.14-E.19 in terms of the draft set of site access drawings to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A, and a summary of the position in relation to design at this stage and detailed design...</p>
Annex F	Transport – Comments on the draft DCO and Supporting Documents	
F.1-F.2	dDCO (APP-019) Schedule 4 Permanent (Part 1) and Temporary (Part 2) Alteration of Streets and Access and Rights of Way Plans (APP-008)	As previously stated in the Applicant's responses on this point; the Access and Rights of Ways Plans [REP2—006] are sufficient for the purposes for which they are intended. That purposes is to articulate the location and extent of the interventions that the draft DCO seeks powers to carry out. It is not a requirement, nor indeed necessary, for them to show the existing highway boundary. The Applicant recognises that the local highways authorities carry out important public functions and desire further information in relation to the detailed design of the proposed access works. To aid discussions, the Applicant has prepared a package of site access drawings which will supersede Annex C of the F-CTMP/TP [AS-300,

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		<p>AS-301], which are submitted at Deadline 3A. A further meeting was held with the LHAs on 24/11/22 with the aim of addressing residual issues on the subject of the site access plans.</p> <p>Article 9(1) of the draft DCO provides that the Applicant may alter the layout of or carry out any works in specific streets. This power relates to permanent alterations of layout in the case of streets specified in column 2 of the table in Part 1 of Schedule 5, in the manner specified in column 3. It also relates to temporary alterations of layout in the case of streets specified in column 2 of the table in Part 2 of Schedule 5 in the manner specified in column 3. The Applicant is not required to seek local highway authority consent or street authority consent when exercising this specific power but is required to obtain street authority consent in relation to the exercise of the general power in article 9(2) for alterations to streets that are not identified in Schedule 5. The locations of the proposed alterations are shown on the Access and Rights of Way Plans [REP2-006].</p> <p>The rationale behind this is that the principle of the specific alterations to streets listed in Schedule 5 ought to be resolved through the grant of development consent, if development consent is granted. However, article 9 should not be seen in isolation; works carried out under the powers in the DCO remain subject to the requirements which include requirement 6, in relation to the approval of detailed design (which expressly includes site accesses) and the wider measures contained in the Framework Construction Traffic Management Plan and Travel Plan, which would be developed into a full construction traffic management plan and travel plan in accordance with requirement 16.</p> <p>The Applicant is aware of the LHAs concerns in relation to this issue and is hopeful that any residual issues can be addressed by way of a side agreement which sets out in more detail how the relevant provisions of the draft DCO will work in practice.</p>
F.3-F.10	Access and Rights of Way Plans (APP-008)	<p>The site access drawings provided in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan submitted at Deadline 3A outline the indicative site access layout required to accommodate the AILs. Modifications are proposed to the northern side of Beck Road which is why the Access and Rights of Way Plans [REP2-006] only identify alterations AS-3 on the northern side of Beck Road. This demonstrates that the improvements necessary are deliverable within the area proposed on the plans.</p> <p>The Applicant has updated the Access and Rights of Way Plans submitted at Deadline 3A to change the name of the road previously labelled "Ferry Lane" to "Freckenham Road".</p>



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		<p>Corresponding amendments to the relevant entries in the DCO Schedules will be made in the next submission of the DCO..</p> <p>Cable Route Access T (AS-6 and CR-T1 to CR-T2 on the Access and Rights of Way Plans [REP2-006]) is an existing access. Swept path analysis was undertaken and the existing site access can accommodate the required vehicles. For completeness a power is sought to carry out alterations at this location if required, but it is not currently envisaged that any notable access works will be necessary.</p> <p>In relation to Access J on Golf Links road, this is an existing access that would be used infrequently during operation. While it will be used, and so it is prudent for the Applicant to acknowledge this through including it in Schedule 7, no alterations are required to Golf Links road and so its omission from Schedule 5 to the draft DCO is intentional.</p>
F.11-F.13	Schedule 14 Part 1 Permanent and Part 2 Temporary Speed Limits	<p>Paragraph 6.1.4 of the Framework Construction Traffic Management and Travel Plan [AS-300, AS-301], which is secured in Requirement 16 of the DCO, states '<i>The proposed traffic management measures summarised below are to occur at different and various time periods throughout the construction of the Scheme. However, notwithstanding this, there could be more than one temporary road closure or temporary PRow closure occurring at the same time.</i>' It is very unlikely that they would occur at the same time, and the potential cumulative effect of multiple closures has been assessed in the Transportation Technical Note in chapter 10 [REP2-041]. This outlines that in practice, the PRow and road closure programme is driven by the grid connection cabling element of the project, which will progress along a linear route, rather than occur in multiple locations simultaneously. Thus, multiple simultaneous closures is very unlikely to occur in practice and therefore the expectation is that there will be isolated, rather than cumulative, impacts.</p> <p>Temporary traffic management (temporary traffic signals and temporary speed limit reductions) as well as a signage strategy is proposed to be provided, as shown on the Traffic Regulation Measures Plan – Temporary Measures [REP2-007 to REP2-011]]</p> <p>Speed surveys were carried out at the request of the local highway authorities to understand the existing speeds of vehicles along the highways which provide access to the site accesses. Therefore the proposals do not rely on the posted speed limits of the highway (e.g. 60mph) as speed survey data was recorded. These are identified in the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] along with the</p>

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		<p>proposed temporary speed limits. The temporary traffic signals and speed limit reductions are applied where the full visibility splay was unable to be achieved without significant vegetation trimming or removal. The access strategy is considered appropriate to provide safe entry and egress to the site accesses during the construction period. Enforcement of the temporary speed limits will occur in the same way that existing and temporary speed limits are enforced, through the Police as well as the additional signage strategy and traffic signals to slow vehicles down to the temporary speed limit.</p> <p>Access to the two staff car parks will benefit from visibility splays based on the speed limit of the highway along Elms Road and La Hogue Road (60mph). This results in a 215m x 2.4m visibility splay to be provided during the operational use. Speed surveys were carried out in October 2021. This includes two locations along Elms Road which identify the 85% percentile vehicle speeds along Elms Road to be between 40mph and 58mph in both directions. The speed survey on La Hogue Road identified the 85<sup>th</sup> percentage to be between 43mph and 44mph in both directions. A summary of the speed surveys are provided in chapter 6 of the Framework Construction Traffic Management Plan and Travel Plan. All other accesses which will be in use during the operational phase are existing farm accesses. The use of these accesses will not be intensified above their existing use.</p> <p>There are no permanent changes to speed limit proposed. During the operational phase there is no reliance placed on temporary speed limit reductions in relation to the site accesses that would remain open throughout the operational phase. As is noted in Table B-9 of the Design Principles (Appendix B to the Design and Access Statement [AS312]) the access locations across Grid Connection Routes A and B will be re-instated to their condition prior to the construction phase; however, the rights to utilise these access points will be retained during operation and secured through the DCO to allow access for maintenance, if required. Should it prove necessary to obtain access to the Cable Route during operation (for example, to repair the cable if it is damaged) then the Applicant would temporarily reinstate the accesses and utilise the corresponding temporary traffic regulation measures to make that access safe for use during the short period of repairs. Following which, the access would again be removed and the traffic regulation measures lifted once they are no longer required.</p>
F.14-F.22	Schedule 14 Part 3 Temporary Road closures	When the carriageway is physically not being dug up and vehicles can still physically pass along the carriageway during the temporary road closure, emergency vehicles, pedestrians

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		<p>and cyclists will be permitted to travel through the road closure. This will comply with the SCC guidance that "wherever possible, access should be maintained for cyclists in both directions throughout the period of road works..." This has been included in the updated Construction Traffic Management Plan and Travel Plan [REP3-013], submitted at Deadline 3, at paragraph 6.3.2.</p> <p>Under paragraph 6.3.2 of the Construction Traffic Management Plan and Travel Plan, each of the temporary road closures are expected to be no longer than one-week and occur on narrow roads where the use of two-way signals is not possible. In addition, Prior to any road closures advanced warning will be provided in line with the Local Highway Authority (LHA) guidance with diversions in place (paragraph 6.3.3).</p> <p>The road closures and diversions will be in line with the 'Traffic signs Manual Chapter 8 road works and temporary situations'.</p> <p>Construction techniques such as HDD or directional drilling will be used where appropriate to avoid road closures, however the temporary road closures is included as a worst-case scenario.</p>
F.23-F.27	Schedule 14 Part 4 Temporary Traffic Signals	<p>It is noted that the use of the temporary traffic signals will comply with the guidance 'An Introduction to the use of Portable Vehicular Signals and 'Traffic Advisory Leaflet 2/11: Portable traffic signals for control of vehicular traffic'. The temporary management including the temporary traffic signals proposed are outlined Traffic Regulation Measures Plan – Temporary Measures [Rep2-007 to REP2-011]. The signage and layout of temporary traffic regulation measures will be agreed with the relevant County Authority in advance of implementation. This has been included in the updated Construction Traffic Management Plan and Travel Plan [REP3-013], submitted at Deadline 3, at paragraph 6.4.2.</p>

#### A.1.1.1