East Cambridgeshire District Council (20031149)
Cambridgeshire County Council (20031358)
Suffolk County Council (20031377)
West Suffolk Council (20031311)

Joint Comments on the Applicant's Responses to Examining Authority's Questions 1 (ExQ1)

Sunnica Energy Farm (EN010106)

Deadline 3A **28 November 2022**

Preamble:

This document has been prepared jointly by the four host local authorities to avoid duplication of work, especially where technical expertise is shared between authorities, based on a template provided by the Planning Inspectorate case team. For ease of use, the content of questions for which the local authorities have not provided comment in this submission have been deleted, but the rows have been retained to preserve numbering.

Abbreviations used:

PA2008	The Planning Act 2008	**ExA**	Examining authority
AC	Alternating current	**HRA**	Habitats Regulations Assessment
ADR	Alternative Dispute Resolution	**LIR**	Local Impact Report
Art	Article	**LPA**	Local Planning Authority
ALA 1981	Acquisition of Land Act 1981	**LVIA**	Landscape and Visual Impact Assessment
AP	Affected Person	**MoD**	Ministry of Defence
BESS	Battery Energy Storage System	**NGESO**	National Grid Electricity System Operator
BoR	Book of Reference	**NGET**	National Grid Electricity Transmission plc
CA	Compulsory Acquisition	**NPPF**	National Planning Policy Framework
CCC	Cambridgeshire County Council	**NPS**	National Policy Statement
CEA	Cumulative effects assessment	**NSIP**	Nationally Significant Infrastructure Project
CPO	Compulsory purchase order	**PHE**	Public Health England
CEMP	Construction Environment Management Plan	**PRN**	Primary Route Network
CTMP and TP	Construction Traffic Management Plan and Travel Plan	**PRoW**	Public Right of Way
DC	Direct current	**PSED**	Public Sector Equality Duty
dDCO	Draft Development Consent Order	**R**	Requirement
DCO	Development Consent Order	**SAC**	Special Area of Conservation
EC	East Cambridgeshire District Council	**SCC**	Suffolk County Council

EIA	Environmental Explanatory Memorandum	**SI**	Statutory Instrument
EM	Explanatory Memorandum	**SoS**	Secretary of State
EN-1	Overarching National Policy Statement for Energy	**SPA**	Special Protection Area
ES	Environmental Statement	**SuDS**	Sustainable drainage system
FPRF	United States Fire Protection Research Foundation	**TP**	Temporary Possession
FRA	Flood Risk Assessment	**WSC**	West Suffolk Council
GLVIA	Guidelines for Landscape and Visual Impact Assessment		

The Examination Library

References in these questions set out in brackets, eg [APP-010], are to documents catalogued in the Examination Library. The Examination Library will be updated as the examination progresses and can be obtained from the following link:
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-002090-Sunnica%20Energy%20Farm%20Examination%20Library.pdf

Index

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
1.0	**Principle and Nature of the Development**			
Q1.0.1	The Applicant			
Q1.0.2	The Applicant and/or East Cambridgeshire District Council and West Suffolk Council			
Q1.0.3	The Applicant	**Good Design** Section 4.5 of the Overarching National Policy Statement (NPS) for Energy (EN-1) emphasises the importance placed on ensuring good design in the development of infrastructure projects. This matter is cross-cutting in relation to multiple topics identified within the Initial Assessment of Principal Issues. Although the NPS is the primary source of policy under which the application will be considered, policy within the National Planning Policy Framework (NPPF)	Introduction: Overall Approach to Good Design As explained by section 6.3 of the Planning Statement [APP-261], and by the Design and Access Statement [APP-264], the design of the Scheme has been aniterative process, which commenced in 2015 at the initial feasibility stage. It has been guided by the "criteria for good design" set out in the Overarching National Policy Statement for Energy EN-1 (NPS), published landscape character assessments and fieldwork analysis. This has resulted in the design process responding to the 'setting' of the sites in order to develop a good design that takes advantage of the landscape and landform in order to reduce the impact of the Scheme on the landscape and limit the visual impact of the Scheme for sensitive receptors, thereby responding to 'place', i.e. how people experience their surroundings.	Refer to Councils' LIR 10.2 – 10.6

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		advocates for good design as do the 'Design Principles for National Infrastructure', developed by the National Infrastructure Commission. Please outline your approach to good design in respect of the following key elements, focusing on emerging technology and how each element reflects the principles of development responding to setting/place and people: a) solar panels: form and associated platforms; b) substations, transmission cables and grid connection; c) the size and location of the battery energy storage systems.	The Design and Access Statement [APP-264] and section 10.7 of the ES Chapter 10, Landscape and Visual Amenity (LVIA) [APP-042] describe how the Scheme design achieves these objectives. In particular, this includes siting of the solar panels, substations and battery energy storage system(BESS) relative to existing landscape patterns, landform and vegetation, through: careful siting of the Scheme in the landscape by the structures being offsetfrom settlement edges, existing vegetation, including hedgerows and "pinelines", public rights of way and road networks; conserving field patterns, ecology and historical features (including belowground archaeology) across the Order limits, including pine lines; and creating new green infrastructure within the Order limits which integrates with networks across the study area and includes new permissive routes to providelinkages between Freckenham and Isleham and Red Lodge and Worlington. The Applicant has applied a hierarchical approach to the design, by first considering the location, scale and positioning of built elements within the existinglandscape framework, as described above. Through this approach the design retains perception of characteristic features, e.g. Pine Lines, distant skylines, landmarks and visual	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			connections between settlements, thereby responding to setting and place. This approach has been key to avoiding impacts on setting andplace. Having carefully sited the Scheme in the landscape, the Applicant refined the design through various stages of the design development process, including taking account of feedback received from stakeholders at the non-statutory and statutory consultations, as described by the Design and Access Statement [APP-264]. For example, following statutory consultation, the Applicant substantially increased the stand-off to solar farm infrastructure from the south-west of Worlington by removing proposals for solar panels from the northern part of ECO1, identified by the Sunnica East Parameter Plan [APP-135]. The Applicant has prepared a Technical Note on Settlement Design Iteration, which is also submitted to the examination at this deadline. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to the setting and people's experience of the landscape and settlements. The design of individual components of the Scheme, including solar panels, substations, cables, and BESS has been considered in the hierarchical designprocess as part of the Scheme's approach to good design and	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			following the careful siting of the overall Scheme that is described above. The following paragraphs address the components of the Scheme that are specifically referenced by parts a, b and c of the question. a) Solar panels: form and associated platforms [racks]; Solar PV and battery energy storage technology is rapidly evolving. In preparing its design, the Applicant has made provision for technological innovation and improvement realised at the time of procurement and construction so that it can select products that may not have been brought to market yet. However, since future innovations cannot be predicted or guaranteed, it also needs to ensure the Scheme is deliverable using existing proven technology. As described by paragraph 3.5.9 of the Scheme Description [APP-0.35], the solar panels will be mounted on racks. We assume that the ExA's reference to 'platforms' intends to refer to these racks. The solar panels and associated racks have been designed to respond sensitively to setting and place, as described in the following paragraph. Through the design development process, the proposed heights of the solar panels have been reduced from 3.5 m above	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			ground level to be a maximum of 2.5 m above ground level. This design decision will help the Scheme fit into the existing landscape framework and avoid or minimise visibility of panels above vegetation, including hedgerows which will be managed to a height of between 2m and 3m as part of the Scheme. The 2.5m height of the panels is lower than other solar NSIP projects. For comparison, maximum panel heights at the proposed Longfield Solar Farm are 3 m, at the consented Little Crow Solar Parkare 3.5 m and at the consented Cleve Hill Solar Park are 3.9 m. Offsets of proposed solar PV arrays have also been increased through the design development process to reduce impacts on the setting of settlements and people's views. The edge of the solar PV array areas is also substantially offset from field boundaries, roads and PRoW to respond to the setting and minimise views of solar panels from people. Figures 8 to 13 of the Landscape and Ecology Management Plan [APP-108], provide illustrative cross sections which depict some of the offsets from roads, PRoW, properties, and hedgerows to solar panelsthat have been allowed for in the design of the Scheme. For example, these illustrate an offset of 118 m to solar panels from Beck Road (Figure 9) and an offset of 22 m to solar panels from PRoW U6006. In all cases, proposed or existing woodland and proposed grassland is incorporated into	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			the design of the Scheme as part of offsets between solar panels and receptors. **)** Substations, transmission cables and grid connection; The Grid connection route has been carefully designed to avoid long term impacts to setting or on people's views by being located below ground, thereby avoiding the introduction of new pylons and visible electricity lines into the landscape. Similarly, onsite cabling would also be located either below ground orabove ground in cable trays attached to other infrastructure. The Applicant has kept the parameter for the maximum heights of substations aslow as practicable. The substations will be a maximum of 10m above ground level, responding to the generally flat or gently undulating character of the receiving landscape. This compares favourably to the proposed Longfield Solar Farm (13 m) and the consented Cleve Hill (12.8 m) (the maximum height of the proposed substation at the consented Little Crow Solar Park does not appear to be stated or constrained). In terms of location, the siting of the substations has been informed by the Environmental Impact Assessment, particularly the LVIA, biodiversity and heritage assessments retaining and	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			reinforcing the existing landscape features and framework to structure the Scheme, break up scale and mass, provide visual screening and enhanced habitat connectivity. The substation at Sunnica East SiteB has been sited so that it is enclosed by existing woodland vegetation to the north and in part by roadside vegetation to the south-east (Elms Road) in order to minimise its impact on its surroundings. Substations at Sunnica East Site A and Sunnica West Site B have been sited in locations that are remote from settlements, and have avoided higher ground and close proximity to public rights of way. Proposals for substantial planting to reinforce the landscape framework and enhance screening of these substations is also proposed. In addition, the substation in Sunnica West Site A has been sited adjacent to barns and mature woodland of Sounds Plantation and the substation at Sunnica East Site A is adjacent to reservoirs and Lee Farm, which will help the massing and land use be perceived in the context of existing infrastructure features and built structures in the landscape. **)** The size and location of the battery energy storage systems The BESS has been co-located with the substations, with the siting selected forthe same reasons as set out in (b), above. The design decision to consolidate BESS and	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			substation infrastructure was also made in order to help minimise the impact of these features on the landscape and people's views. The Applicant also made the design decision that the maximum parameters for the dimensions of each BESS container will be 17 m x 5 m footprint and a maximum of 6 m in height above ground level. The maximum height parameter represents containers being single stacked, thereby minimising their height, in order to help them fit in with their surroundings. The Applicant has also committedthrough the Design Principles submitted as Appendix B of the Design and AccessStatement [APP-264] that the external finish of BESS containers will be in keeping with the prevailing surrounding environment, most likely with a green, light grey or white painted finish.	
Q1.0.4	The Applicant	**Design principles** In the context of EN-1 paragraph 4.5.5, explain how the design of the proposed development meets the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, in all three phases of	<u>Operational Phase</u> Climate Regarding climate, the 'Design Principles for National Infrastructure', developedby the National Infrastructure Commission (NIC Design Principles) set out that projects should *"Mitigate Greenhouse gas emissions and adapt to climate change"*. The Scheme will generate a substantial amount of renewable energy that would be delivered to the NETS. By doing this it would save approximately 1 million tonnes CO2	**Climate and Places** The applicant hasn't provided sufficient information to demonstrate that the scheme will *"contribute to delivery of a biodiversity net gain which would increase ecosystem resilience"* (page 11) or *"an improvement of the environment"* (page 13). Or that it will deliver BNG figures set out at page 17.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		construction, operation and decommissioning.	over its lifetime, making a substantial contribution to the achievement of net zero targets. In this respect the Scheme directly responds to the NIC Design Principles objective that infrastructure should help meet net zero and support an environmentally sustainable society. The Scheme will contribute to the decarbonisation of the NETS, and thereby help all people or businesses that use power from the NETS to reduce their wider climate impacts, as per the NIC Design Principles objective. In addition, the design of the Scheme will deliver substantial new areas of vegetation that will sequester carbon and contribute to delivery of a biodiversity net gain which would increase ecosystem resilience. Places Regarding places, the NIC Design Principles set out that projects should *"Provide a sense of identity and improve our environment"*. The design of the Scheme has been shaped by detailed studies of the character of the landscape and settlements and engagement with stakeholders including through community consultation. As a result of the design approach taken by the Applicant, the design of the Scheme incorporates offsets from solar farm structures to settlement edges, existing vegetation, including hedgerows, public rights of way and road	Paragraphs 8.81, 8.8, 8.188-8.192 of the Councils LIR [REP1-024] set out why the submitted BNS assessment does not adequately demonstrate a net gain in biodiversity. **Landscape** Refer to the Councils LIR (landscape and visual amenity summary and section 10.189 - 10.191) and to the Councils response to EXQ1 Q1.7.7

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			networks. The design of the Scheme also conserves fieldpatterns, ecology and historical features (including below ground archaeology) across the Order limits, including pine lines. This approach preserves the sense of identity of the landscape. The Design and Access Statement [APP-264] describes how the Applicant's approach to the development of the design of the Scheme has been sensitive toplace and local character, including as described below. The Applicant identified land with optimal topography within which to locate a large scale solar development to maximise energy generation but which couldbe successfully integrated to reduce landscape and visual impact (paragraph 3.3.2). The Applicant's masterplanning process incorporated careful siting of the Scheme in the landscape by offsetting structures from existing vegetation and conserving existing landscape features across the sites (paragraphs 3.5.5 and3.5.18). The Applicant has avoided infrastructure within high value archaeological mitigation areas identified through geophysical surveys and avoided any directimpacts on the Scheduled monument within the Order limits with appropriate offsets and screening from this asset (3.5.18). The Applicant's landscape design strategy	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			integrates the Scheme into the landscape; responds to landscape character, amenity, cultural and natural heritage aspects; and reinforces and creates new connections through the landscape to be used by local communities (paragraph 3.5.7). The Applicant reduced the proposed heights of BESS and solar PV arrays through the design development process to minimise visual impacts and betterintegrate into its surroundings (paragraph 3.5.15). The Applicant has sensitively sited the larger structures (substations and BESS) that form part of the Scheme in order to maximise screening, proximityto existing built structures, and to help minimise views (paragraph 3.5.18). Offsets from settlements, roads and PROW have been incorporated into thedesign of the Scheme (paragraph 3.5.18). Through the design development process, proposals for solar PV arrays in E07 as shown on Figure 3-7 of the of the Design and Access Statement [APP-264] have been removed from the Scheme in order to avoid impacts on the open character of the landscape between Freckenham and Isleham to the west of Beck Road (paragraph 3.6.7). Additional infill planting of the Avenue of Chippenham, in addition to the planting proposed in the solar PV areas which are adjacent, is proposed. Thiswill reinforce this historic linear feature (paragraph 3.6.7). To expand on some of the points above, the	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Applicant has prepared a TechnicalNote on Settlement Design Iteration, which is also submitted to the examination at this deadline. This explains in more detail how the Scheme has been refined through the design development process so as to be sympathetic to its setting. As set out in the Design and Access Statement [APP-264] paragraph 3.7.1, over 30% of the area of the Sites will be used to provide green infrastructure, includingnew woodlands and hedgerows. In addition, the Scheme will also deliver new permissive routes and a biodiversity net gain which will contribute to enhancement of the area and improvement of the environment, as per the NIC Design Principles objective. ES Chapter 10, Landscape and Visual Amenity [APP-042] recognises impacts where they occur, but also demonstrates that these impacts are not consistent across the Scheme and have been reduced through good design including embedded mitigation which retains key landscape features and characteristics that contribute to sense of place. Overall, the above demonstrates that the Scheme has been designed sensitively to place and contributes to the quality of the local area as far as practicable, as per NPS EN-1 paragraphs 4.5.1 and 4.5.3and draft NPS EN-1 paragraphs 4.6.1 and 4.6.3 and the NIC design principles.	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			People Regarding people, the NIC Design Principles set out that projects should *"Reflectwhat society wants and share benefits widely"*. RenewableUK Topic Polling Conducted by Survation on behalf of RenewableUK published on 6 September 2022 shows that there is overwhelming public support for building new wind and solar farms to tackle the cost of the energy crisis. The national polling was conducted by Survation using a fully weighted sample of 6,114 people throughout the UK from 27th July to 4th August 2022. This showed that 81% of respondents support energy generation from solar, with only 9% opposing it. Solar was the most popular generation technology, with support for offshore wind (76%), onshore wind (74%), tidal energy (72%), wave energy (72%)also popular (but less so). Support for nuclear (49%), gas from fracking on land (34%), north sea gas (56%) and biomass (45%) was notably lower. In addition, 76% of respondents responded that they support renewable energy projects in their local area, with only 12% opposing. 77% of respondents responded that the UK Government should use wind and solar farms to reduce energy bills. The design of the Scheme will respond	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			directly to what society wants by generating a large amount of renewable electricity to be shared widely by distributing that electricity via the National Electricity Transmission System (NETS). This will make a substantial contribution to helping to deliver a secure, affordable, and low carbon electricity supply, which underpins our quality of life,as explained by Paragraph 3.2.1 of NPS EN-1. Under the 'people' topic, the NIC Design Principles go on to state that: *"Infrastructure should be designed for people, not for architects or engineers. It should be human scale, easy to navigate and instinctive to use, helping to improve the quality of life of everyone who comes into contact with it. This meansreliable and inclusive services. It means accessible, enjoyable and safe spaces with clean air that improve health and wellbeing."* The majority of land within Order limits is currently private with no or limited public access via public rights of way or roads. As such, the principles relating to navigation and instinctive use are less applicable for the Scheme than they wouldbe for more publicly accessible development types. However, care has been taken in the design to retain and set built elements of the Scheme back from PRoW and to enhance vegetation in order to reduce visibility and soften views of solar farm infrastructure from PRoW, as explained by ES Chapter 10,	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Landscape and Visual Amenity [APP-042]. The Scheme has also been carefully designed so that no public rights of way will be closed or diverted during the operational phase. In addition, the design of the Scheme takes opportunities to enhance access by providing additional off-road permissive paths, connecting settlements and the wider countryside, providing a benefit to quality of life. The Scheme avoids land use conflicts that would result inthe loss of publicly accessible open spaces, sports or recreational facilities that help to underpin people's quality of life. Regarding scale, the extent of the Scheme is required in order to generate a large amount of electricity in order to deliver the secure, low cost, renewable electricity generation benefits that society needs. Regarding Scheme components, care has been taken in the design of the Scheme to keep these as small-scale as is practicable whilst seeking to balance that with technical design requirements and performance outcomes. Given that they are the main component of the solar farm, particular attention has been given to the scale of PV arrays. These have been designed to be a maximum of 2.5m high. This will help avoid or minimise visibility of panels above hedgerows which will be managed to a height of between 2m and 3m as part of the Scheme. The 2.5m height of the panels is	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			substantially lower than other comparable projects. For comparison, maximum panel heights at Longfield Solar Farm are proposed are 3m, at Little Crow SolarPark are 3.5 m and at Cleve Hill Solar Park are 3.9 m. In addition, the Applicanthas sought to keep the maximum heights of substations as low as practicable. These will be a maximum height of maximum of 10 m, which compares favourably to other similar projects. The final paragraph under the 'people' topic of the NIC Design Principles statesthat: *"The range of views of communities affected by the infrastructure must be takeninto account and reflected in the design. While it won't always be possible to please everyone, engagement should be diverse, open and sincere, addressinginevitable tensions in good faith and finding the right balance. And it should not just be designed for people today. Good design will plan for future changes in demographics and population."* The Applicant has developed the design of the Scheme through various stages, taking account of feedback received from stakeholders, including having full regard to the views expressed by members of local communities, at the non- statutory and statutory consultations, as described by the Design and Access Statement [APP-264]. For example, following feedback received at	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			statutory consultation, proposals for solar panels were removed from parcels W13, W14, and E07 that are shown on Figures 3-7 and 3-8 of the Design and Access Statement [APP-264] (Parameter Plan as presented in the PEIR Report). The purposes of these changes were, respectively, to reduce the overall massing of the Scheme and to retain the open character of the landscape between Freckenham and Isleham to the west of Beck Road. This is one example of how the Scheme has taken account of the views of communities, as per the NIC Design Principles. The Consultation Report and its appendices [APP-026 to APP-031] detail how each comment made during the statutory consultation has been taken into account by the Applicant. Value Regarding value, the NIC Design Principles set out that projects should *"achievemultiple benefits and solve problems well"*. The design development of the Scheme has followed a landscape-led approach, embedding green infrastructure principles to deliver a multi-functional landscape framework, responding to place and delivering benefits to people and nature beyond. Through this approach, and in accordance with this NIC Design Principle, the Scheme has been designed to deliver benefits beyond the main purpose of the	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Scheme, which is to generate a large amount of renewable electricity that is urgently needed to provide a secure, affordable and low carbon energy system. Section 4.7 of the Planning Statement [APP-261] summarises the additional benefits of the Scheme that add further value to the Scheme for people and the environment. Through the creation and enhancement of habitats, the Scheme is expected to deliver a biodiversity net gain of approximately 83% for habitat units,16% for hedgerow units, and 1% for river units. The Landscape and Ecology Management Plan [APP-108] sets out the design measures through which biodiversity net gain will be achieved. The Scheme incorporates ten areas of high value significant archaeological activity (totalling approximately 97 ha). The design of the Scheme has safeguarded these from development in order to preserve any archaeology present in these areas in situ. These areas are retained within the Order limitsand the design of the Scheme proposes that they are managed as native grassland. This will remove them from agricultural use for the duration of the Scheme, which will protect assets from harm as a result of ploughing. The design of the Scheme also incorporates three permissive routes. These permissive routes will enable increased public access	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			across the landscape of thelocal area. Construction and Decommissioning Phases Climate Paragraphs 6.7.1, 6.7.2, 6.7.5 and 6.7.6 of Chapter 6, Climate Change, of the ES[APP-038] set out measures that have been embedded into the design of the construction and decommissioning of the Scheme in order to reduce the greenhouse gas impact of the Scheme. These include: minimising the creation of waste and maximising the use of alternative materials with lower embodied carbon, such as locally sourced products andmaterials with a higher recycled content where feasible; segregation and recycling of construction and decommissioning waste where reasonably practicable; encouraging the use of lower carbon modes of transport and car sharing; switching vehicles and plant off when not in use and conducting regularplanned maintenance The above are secured by the Framework Construction EnvironmentalManagement Plan [APP-123] and the Framework Decommissioning Environmental Management Plan [APP-125], which are referenced by Requirements 14 and 22 of Schedule 2 of the draft DCO [APP-019]. People and Places	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Measures that will control and minimise the construction and decommissioning impacts on people and places have been an important part of the design and areset out and secured through the Framework Construction Environmental Management Plan (CEMP) [APP-123] and the Framework Decommissioning Environmental Management Plan (DEMP) [APP-125]. Value The construction and decommissioning phases of the Scheme will create significant employment opportunities. The Applicant is also committing to implementing a Skills, Supply Chain and Employment Plan for the construction ofthe Scheme which will include provision of employment opportunities for local people. This is proposed to be a requirement of the DCO. An Outline Skills, Supply Chain and Employment Plan [APP-268] accompanies the Application.	
Q1.0.5	The Applicant, and relevant Local Authorities and Statutory Parties			
Q1.0.6	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.0.7	The Applicant			
Q1.0.8	The Applicant			
Q1.0.9	The Applicant			
Q1.0.10	The Applicant			
Q1.0.11	The Applicant			
Q1.0.12	The Applicant			
Q1.0.13	The Applicant			
Q1.0.14	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.0.15	The Applicant			
Q1.0.16	The Applicant			
Q1.0.17	The Applicant			
Q1.0.18	Suffolk Wildlife Trust			
Q1.0.19	The Applicant			
Q1.0.20	The Applicant			
Q1.0.21	The Applicant			
Q1.0.22	The Applicant			
Q1.0.23	The Applicant			
Q1.0.24	The Applicant			
Q1.0.25	The Applicant			
1.1	**Air Quality and Human Health**			
Q1.1.1	The Applicant, relevant local authority			
Q1.1.2	The Applicant			
Q1.1.3	The Applicant			
Q1.1.4	The Applicant			
Q1.1.5	Cambridgeshire County Council, Suffolk County			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
	Council, East Cambridgeshire District Council, West Suffolk Council			
Q1.1.6	The Applicant			
Q1.1.7	The Applicant			
Q1.1.8	The Applicant			
Q1.1.9	The Applicant			
Q1.1.10	The Applicant			
Q1.1.11	The Applicant			
Q1.1.12	The Applicant			
Q1.1.13	The Applicant			
Q1.1.14	The Applicant			
Q1.1.15	The Applicant			
Q1.1.16	The Applicant			
Q1.1.17	The Applicant			
Q1.1.18	The Applicant	**Battery energy storage system (BESS):** Paragraph 2.3.5 of the outline Battery Fire Safety Management Plan [APP-267] says that the Battery Fire Safety Management Plan will be secured through Schedule 2 of the DCO which will	Paragraph 2.4.1 of the Outline Battery Fire Safety Management Plan [APP-267] lists the consultees that Sunnica has identified as being relevant stakeholders for preparation of the plan, including the relevant emergency services for a fire safetyplan, being the Cambridge Fire and Rescue Service (CFRS) and the Suffolk Fire and Rescue Service (SFRS). It is noted at paragraph 3.1.2 that the Outline Battery Fire	The Councils' view is that the County Councils should be the discharging authorities for this requirement as Suffolk County Council is the Fire & Rescue Authority for Suffolk, and Cambridgeshire County Council governs the Cambridgeshire and

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		require approval by the relevant planning authorities. As the Battery Fire Safety Management Plan is concerned mainly with fire safety, • should the fire and emergency services be consulted, if not required to approve the plan? and • should the emergency services be listed in paragraph 2.4.1?	Safety Management Plan has been developed in collaboration with SFRS and that CFRS deferred consultation on the plan to SFRS. Paragraph 2.4.1 does not include the East of England Ambulance Service Trust,as this is not appropriate given the scope of the Plan is about managing fire safety rather than a plan for how the emergency services should respond in a major event. In any event, EEAST has submitted a Relevant Representation following submission of the DCO application and has not requested that it is consulted as part of developing or approving the plan. Requirement 7 (fire safety management) of the draft DCO states that Work No. 2 must not commence until a battery fire safety management plan has been submitted to and approved by both relevant planning authorities. The battery fire safety management plan approved under Requirement 7 must be substantially in accordance with the Outline Battery Fire Safety Management Plan [APP-267] thatis submitted as part of the DCO application, which was prepared in collaboration with SFRS, or any revision of this document submitted during the examination. Whilst the responsibility is on the relevant planning authorities to approve the plan, Requirement 7 requires both relevant planning authorities to consult with theCFRS and the SFRS before determining an application for approval of the batteryfire	Peterborough Fire Authority jointly with Peterborough City Council. Details are set out at page 13 of SCC's ISH1 post-hearing submission [REP2-086] regarding R7.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			safety management plan. Requirement 7 has been updated in the draft DCO submitted at Deadline 2 to include the Health and Safety Executive as one of the bodies that the relevant planning authorities must consent before determining an application for approval. This secures the need for the relevant local planning authorities to get input from the fire services and the Health and Safety Executive as part of approving the final plan prior to commencement of Work No. 2.	
Q1.1.19	The Applicant	**Battery energy storage system (BESS):** Paragraph 3.1.1 of the outline Battery Fire Safety Management Plan [APP-267] refers to *"the life safety and property protection fire safety requirements".* • Please explain what you mean by "life safety and property protection"; • What are these requirements? and • do they include human health, safety and welfare? (Either say so here or signpost)	"Life safety" refers to minimising risks to Sunnica site personnel and first / second responders who would be required to deal with a BESS safety incident in close proximity to the BESS area. Local residents are situated outside the life safety critical zones but their specific health and safety protocols and incident communication requirements will also be factored into Emergency Response Planning (ERP). "Property protection" covers site equipment and site biodiversity protection (air, water or land pollution control). Site design ensures that a BESS fire incident would have a minimal impact on neighbouring property to Sunnica. "Welfare" has been added to the revised version of the Outline Battery Fire Safety Management Plan [APP-267] at Deadline 2. This clarifies that humanhealth, safety and welfare are requirements. Hazard risk assessments covering these areas are shown in Tables 8-12 in the	The Applicant's response is noted. 'Life safety critical zones' do not appear to be discussed in the original or revised outline BFSMP. The Councils would appreciate clarification as to whether these zones have a defined geographical extent and if so an illustration of that extent and an explanation of how they have been determined.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Outline Battery Fire Safety Management Plan [APP-267].	
Q1.1.20	The Applicant			
Q1.1.21	The Applicant	**Battery energy storage system (BESS):** In paragraph 3.1.3 of the outline Battery Fire Safety Management Plan [APP-267] • What concerns have been raised by local communities? • What do you mean by "historical" BESS projects? • What is "the experience gained from these projects"? • How do your proposals differ from these "historical" projects in terms of fire safety and human health, safety and welfare? • What do you mean by "where reasonably practicable"? • Surely solutions should be implemented as required to reduce any	With reference to paragraph 3.1.3 of the outline Battery Fire Safety ManagementPlan [APP-267]: The concerns raised by local communities are included in Table 3 of the report [APP-267]. Table 3 also includes concerns raised by other stakeholders such as the councils and Fire Service. Further detail of these concerns is also summarised in the Consultation Report [APP-26] in Table 6-19. All issues raised referencing the BESS are listed in Appendix J1-J5 [APP-30], please refer to the 'Human Health' topic area in appendices J-1 to J-5. "Historical" BESS projects is a reference to other, independent BESS projects not associated with this application or the Applicant, and in somecases not based in the UK, which are operational in the world and have experienced some form of accident or unplanned event. These are taken into account in current legislation and guidelines, Manufacturers and fire experts have learnt from these historical projects and have developed research papers to share these lessons. This has ledto the measures presented in Section 6 of the Outline Battery Fire Safety Management Plan [APP-267]. Many of these measures have been a result of lessons learnt from worldwide real life projects and controlled fire explosion tests	While the applicant has engaged with the Councils in producing the outline BFSMP, it is difficult to form a view of the content of the management plan as the appropriateness of any given measure is dependent on the specific technology and design of the BESS system. The County Councils can provide input on operational firefighting matters, but do not have the engineering expertise to provide input on many of the more technical aspects of BESS design. The Councils will therefore be interested to hear opinions from other interested parties with more engineering expertise as the examination progresses.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		and all foreseeable risks to as low as reasonably practicable?	carried out following unplanned events on the historical BESS projects. As noted above, Section 5 of the Outline Battery Fire Safety ManagementPlan presents a comprehensive list of mitigation and control measures, some of which were not included in the design of the "historical" BESS projects around the world that communities referred to. The Applicant agrees to delete the reference to 'reasonably practical'which is shown in the revised document submitted at Deadline 2. The Applicant agrees that solutions should be implemented to reduce any and all foreseeable risks to as low as reasonably practicable. The Applicant considers that this is achieved by the Outline Battery Fire Safety Management Plan [APP- 267], which has been written in liaison with the councils and fire services.	
Q1.1.22	The Applicant	**Battery energy storage system (BESS):** Table 3 of the outline Battery Fire Safety Management Plan [APP-267] at item 2 states that *"The Battery Fire Safety Management Plan will include an emergency response plan during the detailed design stage of the Scheme".* • Surely the Battery Fire Safety Management Plan will include an	An emergency response plan is not included in the Outline Battery Fire Safety Management Plan [APP-267] and is better produced following detailed design when the specific risks are better understood. A requirement for one to be in the Battery Fire Safety Management Plan is noted in Table 3 of The Outline Battery Safety Management Plan [APP-267]. Th Emergency Response Plan (ERP) will be prepared during the detailed design stage and will be in place throughout thelifetime of the Scheme. Requirement 7 of the draft DCO [APP-019] requires Work No. 2 must not commence until a battery fire safety management plan	The Councils agree with the applicant that the measures contained in an ERP should be (and can only be) determined following detailed design of the BESS system. Requirement 7 is important so the Fire Services can ensure that the ERP is an appropriate response to the detailed design.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		emergency response plan throughout the life of the Scheme? • Is an outline emergency response plan included in the outline Battery Fire Safety Management Plan with the detail to be added during the detailed design stage? • If not, please explain how the inclusion of an emergency response plan in the Battery Fire Safety Management Plan will be secured in the DCO.	("BFSMP") has been submitted to and approved by both relevant planning authorities. It says that TheBFSMP must be substantially in accordance with the outline battery fire safety management plan. The Outline BFSMP [APP-267] commits in Table 3 to the preparation of an emergency response plan as part of the updated, BFSMP that will be agreed with relevant planning authorities in consultation with the Fire Services.	
Q1.1.23	Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service, East of England Ambulance Service			
Q1.1.24	The Applicant			
Q1.1.25	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.1.26	Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service, East of England Ambulance Service			
Q1.1.27	The Applicant			
Q1.1.28	The Applicant	**Battery energy storage system (BESS):** Table 3 of the outline Battery Fire Safety Management Plan [APP-267] at item 21 refers to the need *"to observe the minimum of 6m separation between containers rather than the provision of 1-hour fire separation … due to the potential for thermal runaway".* • Is 1-hour fire separation sufficient to prevent thermal runaway? • What impact would a minimum 6m separation between containers have on the	As mentioned in Table 12 of the outline Battery Fire Safety Management Plan[APP-267], which provides a proposed list of risk mitigation methods: *"If the separation distances can't be maintained, thermal barriers shall be provided in accordance with FM Global Datasheet 1-21 for Fire Resistance of Building Assemblies. This will allow containers to be located directly next to eachother. Cable and pipe penetrations into each BESS enclosure will be sealed and provided with rating equal to that required for the BESS enclosure."* The thermal barriers would provide a minimum 1-2 hour thermal insulation as per NFPA 855 (2023) recommendation, and as noted in the illustration in Method RMM01 of Table 12 of the outline Battery Fire Safety Management Plan [APP- 267]. This is to provide protection against propagation to or from other BESS containers. It does not	The Councils' initial response to Q1.1.29 [REP2-080] provides commentary on the benefits of physical separation over thermal insulation.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		layout, footprint and consequent impact of the BESS? • Has this been assessed in the EIA?	prevent thermal runaway on a battery container that is already on fire. The separation between containers has no bearing on thermal runaway. BESS containers located closer together and with thermal barriers will lead to the volume of free air quickly diminishing, therefore any fire reducing. A minimum 6m separation between containers increases the footprint of the BESS compounds, compared with a facility with less (or no) separation between containers (assuming there is no change in capacity). The DCO application has allowed for adequate separation; should 6m be later agreed with the Fire and Rescue Services and host councils, it would not affect the application or EIA. TheEIA has assessed the maximum parameters set out in Table B-1 (Work No1 Design Principles) of Appendix B Design Principles in 7.3_Design and Access Statement [APP-264] and Chapter 3: Scheme Description [APP-035].	
Q1.1.29	Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service, East of England Ambulance Service			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.1.30	The Applicant			
Q1.1.31	Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service, East of England Ambulance Service			
Q1.1.32	The Applicant			
Q1.1.33	The Applicant			
Q1.1.34	Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service, East of England Ambulance Service			
Q1.1.35	The Applicant			
Q1.1.36	The Applicant			
Q1.1.37	The Applicant			
Q1.1.38	The Applicant			
Q1.1.39	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.1.40	The Applicant			
Q1.1.41	The Internal Drainage Boards and the Environment Agency			
Q1.1.42	Cambridge Fire and Rescue Service, Suffolk Fire and Rescue Service, East of England Ambulance Service			
Q1.1.43	The Applicant			
Q1.1.44	The Applicant			
Q1.1.45	The Applicant			
Q1.1.46	The Applicant			
Q1.1.47	The Applicant			
Q1.1.48	The Applicant			
Q1.1.49	The Applicant			
Q1.1.50	The Applicant			
Q1.1.51	The Applicant			
Q1.1.52	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.1.53	The Applicant			
Q1.1.54	The Applicant			
Q1.1.55	The Applicant			
Q1.1.56	The Applicant			
Q1.1.57	The Applicant			
Q1.1.58	The Applicant			
Q1.1.59	The Applicant			
Q1.1.60	The Applicant			
Q1.1.61	The Applicant			
Q1.1.62	The Applicant			
Q1.1.63	The Applicant			
Q1.1.64	The Applicant			
Q1.1.65	The Applicant	**Vehicle emissions** In paragraph 7.2.11 of ES Appendix 13C [APP-118] you say that *"All HGVs routeing to the development sites (with the exception of vehicles used for the transportation of Abnormal Indivisible Loads including cranes) will be required to be compliant with the latest emission standards at the time of construction".* Why the exception?	In the European Union, emissions of nitrogen oxides (NOx), total hydrocarbon (THC), non-methane hydrocarbons (NMHC), carbon monoxide (CO) and particulate matter (PM) are regulated for most vehicle types, including cars, trucks(lorries), locomotives, tractors and similar machinery. For each vehicle type, different standards apply. Compliance is determined by running the engine at a standardised test cycle. The legal framework consists in a series of EU directives,each amendments to the 1970 Directive 70/220/EEC, adopted into UK legislation by the Road Vehicle Emission Performance Standards (Cars and Vans) (Amendment) (EU Exit) Regulations 2019.	The Councils note that other NSIPs have made commitments to control construction vehicle emissions. **Sizewell C** 4.4.45 SZC Co. will seek to ensure that all HGVs will comply with the requirements of Euro VI emission standards where possible and Euro V standards (98/69/EC) as a minimum, unless otherwise agreed with the local authority. (https://infrastructure.planninginspectorate.gov.uk/wp-

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Please confirm that all construction and maintenance vehicles including NRMM will be required to be compliant with the latest emission standards at the time of use.	Road vehicles and non-road mobile machinery need to adhere with the emissions standards at the time of their construction, not the latest, most stringent emission limits for their category at the time they are utilised. For example, an HGV built in 2000 does not have to meet the same emissions standards as an HGV built in 2022. There is not the same abundance of vehicles used for the transportation of AILs including cranes as there is for other types of vehicles such as HGVs, and therefore the Applicant cannot commit to these being aligned with the latest emissions standards at the time of construction. Imposing the latest emission limits for AILs on the Scheme would require the Applicant to source only the newest vehicles, reducing the choice and availability of Contractors. In turn, thiswould delay or could compromise the ability to construct the Scheme. For clarity, all vehicles and non-road machinery associated with the Scheme will meet the relevant emission standards set by UK regulations. The approach takenby the Applicant aligns with UK regulations (Road Vehicle Emission PerformanceStandards (Cars and Vans) (Amendment) (EU Exit) Regulations 2019) and UK good industry practice. For example, the London NRMM Register scheme operates an exemption policy to allow for unusual or rare plant and	content/ipc/uploads/projects/EN010012/EN010012-004831-D2%20-%20Sizewell%20C%20Project%20-%20Other-%20Construction%20Traffic%20Management%20Plan.pdf) **East Anglia One (North)** 72. It has been agreed with ESC and SCC to ensure emissions from HGVs are minimised through Stratford St. Andrew that; in the event of an overlap of the proposed East Anglia ONE North and East Anglia TWO projects' construction phase with the construction of the proposed Sizewell C nuclear power station (SZC), there would be a requirement to ensure at least 70% of the Projects' HGV delivery vehicles are of a Euro VI standard. https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			vehicles to operate on construction sites even if they do not comply with the NRMM low emission zone (see https://www.london.gov.uk/sites/default/files/nrmm_lez_exemption_and_retrofit_p olicy_-_covid-19_update_final_0.pdf).	
1.2 Biodiversity and Nature Conservation (including Habitats Regulations Assessment)				
Q1.2.1	The Applicant			
Q1.2.2	Natural England			
Q1.2.3	The Applicant			
Q1.2.4	The Applicant	**Stone Curlew** Please explain why the protection measures outlined in [APP-108] apply to the proposed offsetting areas, but apparently not to the areas where stone curlew have been recorded, even breeding, some of which will be within the solar arrays? What provision will be made for stone curlew that attempt to breed within the operational areas?	Offsetting habitats have been embedded into the Scheme, as it has been assumed that, in a worst case scenario, Stone Curlew will not nest within the operational site where solar arrays are located. The Framework OEMP [APP-126,ES - Appendix 16F] includes the requirement for all operational staff working within 500m of the offsetting areas created for breeding Stone Curlew to be given a toolbox talk regarding the sensitivity of the species and controlling works which can be undertaken. Where possible, any operational maintenance within 500m of the offsetting areas will be scheduled between November and February. Monitoring of Stone Curlew during operation of the Scheme will establish whetherthe species is nesting within the solar arrays. Should this be found to be the case then the same requirements, with regard to briefing	Although the FOEMP Nov 2022 adds monitoring of solar arrays, (page 16F-7) please refer to the Councils joint LIR 8.147. Stone curlew may continue to use and be displaced to other farmland areas adjacent to the DCO site where the crop is suitable Natural England advise (NE response to Q1.2.6) that the offsetting land can only be considered successful if there is no net loss of stone curlew in and around the Scheme, including nesting pairs. This can only be measured by annual monitoring for the lifetime of the development.

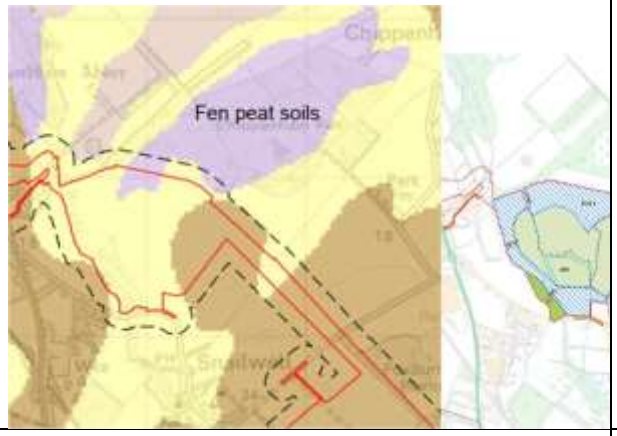
ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			operational staff and controlling works, will be applied to any locations within the operational areas, that are already in included in the Framework OEMP [APP-126, ES - Appendix 16F] for the offsetting areas. Given, the low likelihood that Stone Curlew will nest in the operational areas, seasonal restrictions with regards operational maintenance are not required throughout the Scheme. These measures will be included within the updated Framework OEMP to be submitted at Deadline 2.	
Q1.2.5	The Applicant, Natural England and Suffolk Wildlife Trust	**Stone Curlew** Do you consider the proposed offsetting measures to be appropriate, adequate and realistic, given that (presumably) stone curlew cannot be excluded from operational areas? How confident are you that stone curlew numbers can be retained, including of successfully breeding pairs?	The intention is not to exclude Stone Curlew from operational areas, but to provide sufficient breeding habitat to offset the loss of arable farmland which hasbeen found to be used by the species in the breeding season. The measures arebased on the species' distribution in the local area, informed by detailed surveys between 2019 and 2021 and supplemented by historic breeding information fromthe RSPB. The distribution of Stone Curlew within the farming landscape of the Order limitsand surrounding area is fluid and the species is reliant on the cropping regime inany given year to provide suitable areas of fallow and spring-sown crops to be able to nest. The Offsetting Habitat Provision for Stone-Curlew Specification [APP-258], sets out how the Scheme has embedded sufficient areas within the Scheme design to offset any potential reduction in arable farmland, that may, in any given year, be used by	Paragraph 2 states that the "*Scheme design for offsetting impacts on Stone Curlew utilise the species' current and historical distribution across the Order limits*." It should be noted that offsetting only utilises (a relatively small) part of the current and historical distribution. The Applicant has not demonstrated how the scheme will deliver at least 16 hectares of high-quality habitat for Stone Curlews, as per Natural England's guidance. Of particular concern is the positioning of offsetting area within suboptimal areas, given the proximity of the road, houses, PROW and the solar farm itself. Therefore, the Applicant's response does not address the Councils concerns as set out paragraphs LIR

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Stone Curlew and avoid a net reduction in breeding and foraging opportunities for the species. The areas embedded within the Scheme design for offsetting impacts on Stone Curlew utilise the species' currentand historical distribution across the Order limits. Therefore, since this replicates the conditions the birds are already utilising, it is considered a suitably robust approach informed by empirical information on the nesting behaviour of the specific Stone Curlew pairs in question in this landscape. Furthermore, the habitat, including nesting plots, has been designed and will be delivered followingwhat has been successful with the other similar habitat and nesting plots around the Breckland area. With reference to the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and the Landscape and Ecology Management Plan [APP-108], over 100ha of predominantly arable farmland have been embedded within the Schemefor reversion to grassland, specifically managed to create a close-cropped sward, suitable for Stone Curlew. Small areas of existing acid grassland have also been retained within the Scheme design in Sunnica East Site B and these will form the basis of reverting adjacent areas in Sunnica East Site B to semi-natural grassland, characteristic of the Breckland heaths. This equates to greater than the 16 ha per pair and acknowledges the requirement for not only suitable nesting sites, but also the requirement for foraging	8.57 – 8.67 and 8.147 – 8.150 of the Council's LIR [REP1-024]

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			habitat. Additionally, the provision of a maximum of ten (minimum of five) 2ha plots maximises the potential for take up with two plots allocated per pair. Plots unoccupied for nesting will contribute an important resource for foraging pairs. The Applicant considers that the land embedded within the Scheme for Stone Curlew allows the flexibility for any adaptive management prescriptions to ensurethe success of the offsetting areas, the detail of which will be brought forward pursuant to Requirement 10 of the DCO (as amended at Deadline 2 to allow for post consent development).	
Q1.2.6	Natural England & Suffolk Wildlife Trust			
Q1.2.7	The Applicant	**Stone Curlew** Para 1.8.16b of [APP-108] mentions the danger posed to stone curlew nests and chicks from tractor wheels during spraying. Given that the point of the spraying is to create bare areas to encourage stone curlew nesting, please explain what measures can be put in place to ensure that the very activity of spraying does not	This point is noted. Operational monitoring of Stone Curlew plots, secured through the OEMP, will help to establish the location of nesting locations prior to spraying commencing. This will inform the process for the application of any herbicides to Stone Curlew plots. The management of Stone Curlew plots will be within the remit of the Ecology Advisory Group, who will ensure that managementtechniques are compatible with protection of the species' nests and chicks.	The Councils welcome the inclusion of Stone Curlew surveys prior to herbicide spraying within, page 16F-7 of the FOEMP [REP2-031]) However, the FOEMP provides no information about what procedure will take place if nesting Stone Curlews are present. The Councils seek confirmation within the FOEMP that spraying of occupied plots will only be undertaken prior to nests hatching, or alternatively wait until chicks have fledged (or a nest failed).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		destroy stone curlew nests and chicks.		The Applicant's following statement is not accurate: *"The management of Stone Curlew plots will be within the remit of the Ecology Advisory Group, who will ensure that management techniques are compatible with protection of the species' nests and chicks."* The management and monitoring of all ecological management, including Stone Curlew plots, will be the responsibility of the Applicant. It will be the responsibility of the Applicant to set up an Ecological Advisory Group with relevant stakeholders to discuss and provide technical advice about managing the site for biodiversity.
Q1.2.8	The Applicant	**Biodiversity net gain** Please confirm whether the balance in the biodiversity net gain figures includes mitigation and compensation as well as overall biodiversity net gain? If so, what is the figure for net gain alone?	As no European Protected Species Mitigation Licences are needed as a result of the Scheme, there was no need to account for any associated habitat creation or mitigation in the calculations. Likewise, the Scheme is not providing any compensatory habitats for any habitats or species. As such, all areas of habitat creation were included in the biodiversity net gain calculations using metric 3.0. The biodiversity net gain is being recalculated using metric 3.1 and will be submitted at a later Deadline. This will consider where	The Councils welcome the recalculation of the BNG assessment using Defra metric 3.1. This should be underpinned by habitat surveys using UKHabs criteria. Condition assessments for the habitats should be supplied, along with maps showing the location of each parcel of pre- and post- development habitat type, along with annotations of the condition for each parcel.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			areas may be classed as mitigation as laid out in the latest guidance, in order to avoid any double counting.It will also take into account updates to habitat changes from recent updating surveys.	*"the Scheme is not providing any compensatory habitats for any habitats or species"* It is unclear what the applicant means, given the scheme will be providing compensatory habitat for stone curlews, arable plants / arable field margins, hedgerows and other temporary / permanent loss of habitat as set out in pages 12-20 of the Schedule of Environmental Mitigation [APP-257] The Councils agree with Natural Englands' response to ExQ1 that *"land proposed as offsetting for stone curlew has been considered as mitigation through the Habitats Regulations and therefore should not be included within BNG calculations"* (page 11, [REP2-090].
Q1.2.9	The Applicant & Natural England	**Ecological mitigation** How confident are you that new wetland indicated in Figure 10-14E of the Environmental Statement, Landscape Masterplan [APP-213] can successfully be created, in ecological and operational terms?	hydrological connectivity with Chippenham Fen, and will enhance the buffer zone around the Fen. The priority for this area is to create a contiguous area of higher quality habitat, buffering, but also extending the core nature sites. Whilst much ofthis area will be grassland, wetland mosaics are targeted in the existing wetter areas or where there are remnant peat soils. Allowing the drainage of the new wetland area to return to a more natural condition;	The Councils consider insufficient information has been provided to demonstrate the success of the proposed landscape masterplan, including at ECO4

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			and thus creating an area wetland mosaic, as the Scheme proposes, will utilise the existing soil conditions and topography. Where suitable, this will involve preparing the surface, i.e. raking the surface to create a fine tilth and ensuring that the new wet grassland is level with the surrounding area; and fill it up slowly with water from Chippenham and the River Snail. It may take a year or two before the wetland area finds its balance but, once it has been established and looked after properly, it will be a low maintenance area. A sustainable grazingregime will also be sought, building on experience gained from the management of Chippenham Fen, to maximise the quality of these new grassland areas. 	
Q1.2.10	The Applicant	**Grassland re-establishment** Please clarify which areas referred to as "native grassland" in figures 1 – 5 of	The Applicant is preparing a figure showing the areas referred to as "native grassland" in Figures 1 – 5 of the LEMP [APP-108] in relation the underlying soils, e.g. showing the areas that are intended for acid	The Councils look forward to reviewing the forthcoming figure being prepared.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		the LEMP [APP-108] are intended for acid and for chalk grassland establishment and explain how these relate to the underlying geology and how the variation in grassland types will be achieved.	grassland and for chalk/other neutral grassland establishment overlying the soils map. The figure will reaffirmthe confidence the Applicant has in establishing these grassland areas. The variation in grassland types will be achieved: through natural regeneration such that immediately after the seeds have been sown, the ground should be left undisturbed (watering the seeds will not be necessary), and where practicable, allowing livestock to move between the areas,re-establishing traditional management grazing or hay-cutting practices which will help to restore grassland areas; from seed collection from the grasslands identified within the Order limits and locally to the Scheme for the purpose of maintaining continuity with local species; using ground disturbance for encouraging naturally occurring species in the soil'sseed bank including rare arable flora; and through a suitable long-term habitat management regime with grassland being managed by either low intensity grazing or infrequent hay cutting to allow plantspecies to flower and seed. Species composition will take into consideration: microclimatic conditions taking into account such factors as prevailingwind and exposure, and local hydrology; soil types based on the soil map for the Scheme which in preparation such that e.g.	In addition, the LEMP should be updated to include detailed information [APP-018]

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			acid grassland parcels will be created on freely drainingslightly acid sandy soils with low nutrients; local and national biodiversity targets, e.g. Nature Recovery Network, B-lines and local biodiversity action plans (BAPs); and promoting annual seed-bearing plant species to benefit declining farmlandbirds such as Turtle Dove (*Streptopelia turtur)*. Habitat creation will include areas of bare ground, with grassland to be managedby either low intensity grazing or infrequent hay cutting to allow plant species to flower and seed.	
Q1.2.11	The Applicant	**Grassland re-establishment** ref [APP-101] Please explain how you propose to secure locally harvested seed and whether appropriate and available sources have been identified.	Based on experience on other similar sites and using the extensive knowledge of Breckland and the surrounding landscape, going back to the mid-1900s, e.g. "An Ecological Flora of Breckland", there is significant scope to secure locally harvested seed to assist in establishing acid grassland and chalk grassland. Thishas been established using the soil map for the Scheme, field observations and identification of sites with the appropriate species composition, e.g. those thathave benefited from focussed agri-environment schemes. The next stage is to enter into agreements with landowners and, at the appropriate time, to use good practice methods for harvesting seeds from donorsites.	The LEMP should be updated to include detailed information [APP-018].
Q1.2.12	Natural England &			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
	Suffolk Wildlife Trust			
Q1.2.13	The Applicant	**Glint & Glare Assessment** Please explain whether you have considered the potential impact of glint and glare from the solar panels on birds (especially water birds) and invertebrates, and how you propose to mitigate any potential impacts.	The Applicant can confirm that the potential impact of solar panels on birds, particularly waterbirds was considered, but it was deemed that no impact pathwayexisted. This was based on the following: The Scheme will not create habitat that will attract significant numbers ofwaterbirds. The wintering bird surveys (6.2 Environmental Statement - Appendix 8H [APP-084]) did not record significant numbers of waterbirds as being present within the Survey Area. The Scheme is not on a migratory route for birds or on a path connecting areas supporting significant numbers of birds, *e.g.* waterbodies supportingwaterbirds. The potential impact of attraction of aquatic invertebrates, especially those associated with Chippenham Fen, to the panels, is discussed in 6.2 Environmental Statement - Appendix 8M [APP-092], with the conclusion of nosignificant effects. A technical note, providing further information as to this potential effect, requested by consultees, is appended to this response. There is no evidence to suggest that there are any further impacts from glint andglare to biodiversity.	The Councils welcome the Application's submission of the 'Review of impact of Sunnica energy farm on aquatic invertebrates' document, Appendix C [REP2-038]. The Councils are satisfied that the scheme will have negligible impact on the designatory species of the Fenland SAC / Chippenham Fen Ramsar site. However, a number of aquatic species that have been recorded within Chippenham Fen could potentially be impacted by solar panels. The Councils do not agree with the conclusion that the impact on invertebrates of Chippenham Fen SSSI will be negligible due to the lack of comprehensive research on the impact of solar farms and assumptions within the reports about, future management of Chippenham Fen, the behaviour of insects, and prevailing wind (paragraph 4.1.15).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				The Councils seek an update of the document to address the following points: <u>Barrier between Chippenham Fen and Snailwell Fen.</u> The Councils agree that the current shelterbelt around Chippenham Fen nature reserve, which is in place to protect against drift of pesticides / fertilisers, would provide a barrier to the solar panels. However, the long-term aim of Chippenham Fen should be to reduce the shelterbelt to allow expansion of the fen. The reliance on the shelterbelt within Chippenham Fen to mitigate to impact of the solar farm on aquatic invertebrates would prevent the restoration of the Chippenham Fen for the next 40 years. The Councils consider that the applicant should review their assessment to take into account of the long-term aims of Chippenham Fen and not assume that the shelterbelt will be managed / retained throughout the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				operational lifetime of the proposed solar farm development. <u>Prevailing Wind</u> Although there is a prevailing wind, the wind direction does change and as such this does not preclude the chance movement of insects as has been observed in some of the limited studies undertaken. As a precaution, greater consideration should be given to local weather patterns and the set out the potential impact if the wind blows from a "non" prevailing direction.
Q1.2.14	The Applicant			
Q1.2.15	Natural England			
Q1.2.16	Natural England			
Q1.2.17	The Applicant			
Q1.2.18	The Applicant			
Q1.2.19	The Applicant			
Q1.2.20	The Applicant	**Habitats Regulations Assessment**	This comment is noted. Piling associated with the BESS (located within Sunnica East Site B and Sunnica West Site A) and the	The Applicant states that the pilings associated with the BESS

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Table 4-1 of the assessment [APP-092] does not appear to consider the potential for piling up to a depth of 12m at the BESS and the three onsite substations at Sunnica East sites A and B and Sunnica West Site A. Please provide an update to the assessment that confirms, and where relevant, assesses, the potential for significant effects on sites and qualifying features for the following impact pathways: • Habitat contamination; and • Groundwater disturbance.	three onsite substations at SunnicaEast sites A and B and Sunnica West Site A are, at the closest approximately 0.35 km from Fenland SAC/Chippenham Fen Ramsar site and therefore, impact pathways for habitat contamination and groundwater disturbance were not considered to exist. The assessment has considered the intrusive elements of the Scheme nearest to the designated sites, i.e., the mounts for the solar panels, and concluded no likely significant effects through habitat contamination and groundwater disturbance. The updated HRA report, to be submitted at Deadline3, will address this issue, as requested.	and the three onsite substations are *"at the closest approximately 0.35 km from Fenland SAC/Chippenham Fen Ramsar site"*. The Councils assume the piling works are located within Works No. 2 (BESS) and 3 (onsite substations) areas shown on the Works Plan [REP2-005], but cannot identify any locations approximately 0.35km from Fenland SAC / Chippenham Fen Ramsar. The Councils therefore seek confirmation of the location of the proposed piling works that will be undertaken approximately 0.35km from the designated site. The Applicant states that "The Scheme has taken this fluid nesting distribution into consideration and sought to avoid blocks of land where regular nesting attempts have been observed e.g., those in ECO3'. However, this does not explain why the Applicant has not avoided other land parcels where stone curlew have been recorded nesting, according to the Applicants relatively limited stone curlew survey of the DCO site, and

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				noting that a review of historic stone curlew records is not included in the DCO information. For further information please see LIR 8.6 [REP1-024].
Q1.2.21	The Applicant			
Q1.2.22	The Applicant			
Q1.2.23	The Applicant			
Q1.2.24	The Applicant			
Q1.2.25	The Applicant			
Q1.2.26	The Applicant			
Q1.2.27	The Applicant	**Habitats Regulations Assessment** Please provide an update to Section 5.3 of the HRA Report [APP-092] to confirm what alternative mitigation measures for the Stone Curlew qualifying feature of Breckland SPA were considered, and the reasons for the choice of the measures presented in the HRA Report.	This comment is noted and will be addressed, where necessary, in the updated HRA report to be resubmitted at Deadline 3. Stone Curlew has a fluid distributionwithin the farming landscape of the Order limits and surrounding area and is reliant on the cropping regime in any given year to provide suitable areas of fallow and spring-sown crops to be able to nest. As such the nesting locations can vary annually depending on this availability. The Scheme has taken this fluid nesting distribution into consideration and sought to avoid blocks of land where regular nesting attempts have been observed *e.g.,* those in ECO3. This principal of avoidance has guided the locations of the offsetting areas which have taken into account not only the species existing distribution, but also the design and	The Councils look forward to commenting on the proposed updated HRA when submitted at Deadline 3. The Applicant states that "The Scheme has taken this fluid nesting distribution into consideration and sought to avoid blocks of land where regular nesting attempts have been observed e.g., those in ECO3'. However, this does not explain why the Applicant has not avoided other land parcels where stone-curlew have been recorded nesting, according to the Applicants relatively limited stone curlew survey of the DCO site, and

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			construction elements of the Scheme (e.g., to minimise construction disturbance),the location of residential areas and the ability to be able to secure large continuous blocks of land to maximise delivery of habitat creation and nesting plotopportunities and allow for efficient management. The Scheme has embedded sufficient areas within the Scheme design to offset any potential reduction in arable farmland, that may, in any given year, be used by Stone Curlew and avoid a net reduction in breeding and foraging opportunities for the species. Alternative mitigation measures, including the creation of Stone Curlew nesting plots in arable fields outside the Order limits were considered, but the ability of the Scheme to incorporate the creation of permanent grasslands with managed nesting plots within the Order limits and thus not requiring third party land, was considered the optimal solution for not only providing, but securing, long term, high quality nesting and foraging habitat for the Stone Curlew population occurring within and surrounding the Order limits. The use of nesting plots is a proven method for providing suitable nesting habitat for Stone Curlew in Breckland and is supported by the RSPB information note 'Managing nest plots for stone-curlews'.	noting that a review of historic stone curlew records is not included in the DCO information. For further information see LIR 8.6 [REP1-024].
Q1.2.28	The Applicant			
Q1.2.29	Natural England			
Q1.2.30	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.2.31	The Applicant			
Q1.2.32	The Applicant			
Q1.2.33	The Applicant			
Q1.2.34	Natural England			
1.3 Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations				
Q1.3.1	The Applicant			
Q1.3.2	The Applicant			
Q1.3.3	The Applicant			
Q1.3.4	The Applicant			
Q1.3.5	The Applicant			
Q1.3.6	The Applicant			
Q1.3.7	The Applicant			
Q1.3.8	The Applicant			
Q1.3.9	The Applicant			
Q1.3.10	The Applicant			
Q1.3.11	The Applicant			
Q1.3.12	The Applicant			
Q1.3.13	The Applicant			
Q1.3.14	The Applicant			
Q1.3.15	The Applicant			
Q1.3.16	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.3.17	The Applicant			
Q1.3.18	The Applicant			
Q1.3.19	The Applicant			
Q1.3.20	The Applicant			
Q1.3.21	The Applicant			
Q1.3.22	The Applicant			
Q1.3.23	The Applicant			
Q1.3.24	The Applicant			
Q1.3.25	The Applicant			
Q1.3.26	The Applicant			
Q1.3.27	The Applicant			
Q1.3.28	The Applicant			
Q1.3.29	The Applicant			
Q1.3.30	The Applicant			
Q1.3.31	The Applicant			
Q1.3.32	The Applicant			
Q1.3.33	The Applicant			
Q1.3.34	The Applicant			
Q1.3.35	The Applicant			
Q1.3.36	The Applicant			
1.4	**Cultural Heritage and Historic Environment**			
Q1.4.1	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.4.2	The Applicant			
Q1.4.3	The Applicant			
Q1.4.4	The Applicant			
Q1.4.5	The Applicant and the local authorities	**Historic Environment Management Plan (HEMP)** It is noted within chapter 7 of the ES [APP-039] that the Applicant does not intend to submit a HEMP. This was originally requested within the Scoping Opinion and has been requested within the Cambridgeshire County Council Relevant Representation. Please comment on the requirement to submit a HEMP to the Examination, and for it to be secured within the DCO.	A standalone HEMP document is not proposed as the requirements of such a plan will be incorporated within the Construction Environment Management Plan (CEMP) or Landscape Environment Management Plan (LEMP) to be approved bythe relevant county authority for the works. Archaeological works moving forward will be required to be in accordance with adetailed archaeological mitigation strategy, as secured by Requirement 13 of theDCO. The Applicant has been working with CCC and SCC to produce this strategy, which will be submitted at a future examination deadline.	The Councils consider that a HEMP is required to properly capture and manage the construction, operational and future (decommissioning) impacts upon the sensitive and finite archaeological resource in these areas. The Councils would seek for this to be separate to the Construction Environment Management Plan as this will cover the operational and decommissioning stages as well.
Q1.4.6	The Applicant	**Archaeological surveys** ES Chapter 7 [APP- 039] paragraphs 7.2.6 and 7.3.6 identify data gaps in the extent of geophysical surveys due to access. • Please clarify to what extent these gaps have now been filled, and how the results of baseline	The Scheme has been subject to appropriate archaeological assessment, including higher levels of evaluation trenching in areas not accessible for the geophysical survey. The lack of geophysical survey coverage in certain areas was discussed with CCC and Suffolk County Council Archaeological Services (SCCAS) and enhanced samples of trial trenching were employed to compensatefor any data gaps in these areas. The results are	Completion of the evaluation is necessary in order to inform the Detailed Archaeological Mitigation Strategy (DAMS) which will be submitted at a future Examination deadline.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		information gained from additional trial trenching work affects the Environmental Statement and in particular the Cultural Heritage chapter [APP-039]; and • Please provide a list of these areas and confirm whether and when there will be further submissions of baseline information to the Examination.	contained within the trial trench reports [Appendix 7H- [Sunnica East Sites A and B Archaeological Trial Trenching Report] of the Environmental Statement [PDA-002] and Appendix 7I- [Sunnica West Sites A and B Archaeological Trial Trenching Report] of the Environmental Statement [APP-076]. The principal areas of enhanced trenching were in Fields E01 and E03 of Sunnica East. No further baseline information is therefore required to be submitted. The conclusions presented in ES Chapter 7 [APP-039] have not changed as a result of full and final reporting on the evaluation trenching. The assessment of archaeological potential has been suitably assessed based on the available dataand professional judgement to characterise the archaeological baseline. Details of additional evaluation (including geophysical and trenching), if required, will be included within the forthcoming Detailed Archaeological Mitigation Strategy(DAMS) which will be submitted at a future examination deadline.	
Q1.4.7	The Applicant			
Q1.4.8	The Applicant			
Q1.4.9	The Applicant			
Q1.4.10	The Applicant			
Q1.4.11	The Applicant			
Q1.4.12	The Applicant	**Archaeological mitigation**	Further consultation with the Councils has been undertaken and a Detailed Archaeological Mitigation Strategy (DAMS)	Completion of the evaluation is necessary in order to inform the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		In Relevant Representations [RR-1178, RR-1340], CCC and SCC note that the Applicant's mitigation strategy is not developed and will require further consultation with the Councils. In relation to the Detailed Archaeological Mitigation Strategy: • Please confirm whether this will be submitted to the examination • Please confirm who will be responsible for implementing the strategy.	will be submitted as soon as possible, subject to timely receipt of a brief currently being prepared by the joint Local Authority Historic Environment teams for Cambridge County Council (CCC) and Suffolk County Council Archaeological Services (SCCAS). The DAMS will set outthe principles of archaeological mitigation for the Scheme, including Post- excavation Assessment, Updated Project Design and Publication requirements. Additional Site-Specific Written Schemes of Investigation (SSWSI), e.g., for any further Trial Trench evaluation, may be submitted at subsequent deadlines and appended to the DAMS. The DAMS and all subsequent SSWSI will be implemented by the Applicant in accordance with a detailed programme agreedby the Councils and the Applicant.	Detailed Archaeological Mitigation Strategy (DAMS). The Councils can provide a joint brief upon receipt of the results of the evaluations which remain to be completed. The Councils welcome the DAM, which sets out the principles of archaeological mitigation for the Scheme, including Post-excavation Assessment, Updated Project Design and Publication requirements. This should also include archiving requirements.
Q1.4.13	Isleham Parish Council			
Q1.4.14	Suffolk County Council			
1.5	**Draft Development Consent Order (dDCO)**			
Q1.5.1	The Applicant			
Q1.5.2	The Applicant			
Q1.5.3	The Applicant			
Q1.5.4	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.5.5	The Applicant			
Q1.5.6	The Applicant			
Q1.5.7	The Applicant			
Q1.5.8	The Applicant/the relevant planning authority	**Art 2: Interpretation:** The definition of "maintain" includes "reconstruct" with no upper limit save that it does not include reconstruction of the whole of the authorised development. • Are you satisfied that this definition of "maintain" is not too extensive and widely drawn?	A definition of "maintain" has been added to make clear what activities are authorised under Article 5 (power to maintain the authorised development) duringthe operation of the authorised development. The Applicant is satisfied that this definition of maintain is not too extensive and widely drawn. The definition has been drafted to directly reflect the nature and context of the authorised development, which will need to be properly maintained,managed and protected throughout its operational lifetime. The drafting, therefore, reflects this operational period and likely framework of maintenance that will be required while enabling technological and practice advancement and improvements within identified environmental performance standards. Paragraph 5.2.2(f)(ii) of the Explanatory Memorandum (APP-020) sets out examples of the activities anticipated to be covered, including works to 'reconstruct', where if, for example, part of the authorised development has to bedismantled in order to be repaired or refurbished, then this part will need to be reconstructed. Accordingly, the Applicant's view is that it would not be appropriate to set an upper limit on any works needed to reconstruct the authorised development, savefor it doesn't	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			include reconstruction of the whole authorised development, so that the Applicant can properly maintain the Scheme and it can continue to meet the identified need throughout its operational lifetime. In addition, Article 5 of the draftDCO only authorises maintenance to be carried out where there are no materiallynew or materially different environmental effects that have not been assessed in the environmental statement. Therefore, the definition of "maintain" already contains limits. The Applicant would note that the definition of "maintain" in the recently made Sizewell C (Nuclear Generating Station) Order 2022 goes wider than the proposed definition in the draft DCO — first it includes "clear" as one of the maintenance activities and secondly it does not include the restriction regardingthe whole of the authorised development.	
Q1.5.9	The Applicant/the relevant planning authority	**Art 2: Interpretation:** The definition of "permitted preliminary works" is extensive. Are you satisfied that • The resulting impacts are not included in the environmental impact assessment; and • This definition is not too widely drawn?	The Applicant has given careful consideration to the works comprised in the definition of "*permitted preliminary works*" and where in the draft DCO they wouldbe able to be undertaken without restriction. With some exceptions (discussed below) the works identified as "permitted preliminary works" have been identified as such as the Applicant considered their environmental impact does not require the mitigation secured by the Requirements in Schedule 2 to be in place before those works can be undertaken.	The proposal to include a preliminary works traffic management plan for certain phases of the preliminary works is welcomed by the Councils. However, it would be helpful if the Applicant could confirm whether such plans will follow the principles set out in the Framework Construction Traffic Management and Travel Plan (REP3-012).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			In the draft DCO (revision 1), the Applicant has expressly identified those permitted preliminary works where it considers it would be appropriate to restrict by including them in the term "commence" for the purposes of the relevant requirement. This can be seen with Requirement 11 (F*encing and other means ofenclosure*) and Requirement 18 (*Ground conditions*). That is because some aspects of the permitted preliminary works (for example, assessing ground conditions and means of enclosure) may be required to be subject to the detail ormeasures approved pursuant to these requirements. Further to the Hearing on the draft DCO, the Applicant has made the followingchanges: Requirement 8 (Landscape and ecology management plan) – site clearance relating to vegetation removal of permitted preliminary workshas been included in the remit of the Requirement; Requirement 13 (Archaeology) – intrusive archaeological surveys ofpermitted preliminary works has been included in the remit of the Requirement; Requirement 14 (*Construction environmental management plan*) – above ground site preparation for temporary facilities and site clearance of permitted preliminary works have been included in the remit of the Requirement; An additional traffic management plan for permitted preliminary works hasbeen included as a Requirement.	In addition, The Councils consider that all works involving the formation of or change to any vehicular access, whether on a temporary basis or not, needs to be subject to a prior approval process. The Councils seek confirmation that the proposed amendments to requirement 16 secure this.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Requirement 8 (*Landscape and ecology management plan*) excludes permitted preliminary works from the commencement requirement. This is because such works would not result in likely significant environmental effects requiring management or mitigation (of the type secured in the management plan) to be in place before they are carried out. With the above changes, the Applicant considers that it has resolved theconcerns of the local authorities.	
Q1.5.10	The Applicant			
Q1.5.11	The Applicant			
Q1.5.12	The Applicant			
Q1.5.13	The Applicant			
Q1.5.14	The Applicant			
Q1.5.15	The Applicant			
Q1.5.16	The Internal Drainage Boards and the Environment Agency			
Q1.5.17	The relevant planning authority			
Q1.5.18	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.5.19	The relevant highway authority			
Q1.5.20	The Applicant	**Art 11: Temporary stopping up of public rights of way:** • Please confirm that there are no public rights of way which are to be stopped up permanently. • Article 11(5) refers to private rights of way. Please detail all those private rights affected by your proposals.	Article 11 (*Temporary stopping up of public rights of way*) provides for the temporary stopping up of public rights of way for the purpose of constructing or maintaining the authorised development. The Applicant confirms that there are nopublic rights of way that are to be stopped up permanently under Article 11, or any other provision in the Order. Article 11(5) provides that compensation is payable in respect of the loss from the suspension of any private rights of way as a result of the exercise of the power conferred by article 11. The Applicant is not aware of any particular private rights of access over a public right of way that would be suspended as a result of the exercise of the powers conferred by this article. Paragraph (6) is included as a contingency to make provision for compensation should such a circumstance arise. While it is unusual for a property to enjoy a private right of access over a publicright of way, it can occasionally arise in rural areas. The inclusion of this paragraph (5) ensures that such persons are appropriately compensated if thatwere to occur.	The Applicant's response is noted. (The Councils assume the reference to "paragraph (6)" in the final sentence of the penultimate paragraph should be to "paragraph (5)").

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.5.21	The relevant street authority			
Q1.5.22	The relevant highway authority			
Q1.5.23	The Applicant	**Art 12: Access to works:** There does not appear to be a subclause covering deemed consent if the LPA does not respond within 28 days. Are you content?	Article 12 is captured by Schedule 13 of the draft DCO, in accordance with Article42(2): Article 42(2) of the draft DCO provides that Schedule 13 has effect in relation to all consents, agreements or approvals granted, refused or withheld in relation to any provision of the draft DCO, except in relation toany consents, agreements or approvals contemplated by Schedule 12 (protective provisions) or any dispute under Article 16(6) (protective workto buildings). Schedule 13, paragraph 2(1) provides that, where an application is madeto a "relevant authority" for any consent, agreement or approval contemplated by any of the provisions of the draft DCO, the relevant authority must give notice of their decision within 28 days (except in respect of the requirements in Schedule 2, where the period is eight weeks). Note that in the draft DCO submitted at Deadline 2, this period of 28 days has been extended to 56 days which aligns with the recentlymade Sizewell C (Nuclear Generating Station) Order 2022. Under Schedule 13, paragraph 2(3) (subject to paragraph 2(4)), if the relevant authority does not determine the application within the prescribedperiod, they are deemed to	Since the timeframes under paragraphs 2(1)(a) and (b) of Schedule 13 are now the same (i.e. 56 days in each provision) are separate sub-paragraphs (a) and (b) needed? The Councils understand the reference to "28 days" in the final sentence of the Applicant's response should be to "56 days". In any event, the Councils consider 56 days is a reasonable and appropriate timeframe for determining consents etc. and requirements under the DCO.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			have granted the application. The "relevant planning authority" referred to in Article 12(3) of the draft DCO fallswithin the definition of "relevant authority" for the purposes of Schedule 13. This means that, in accordance with paragraph 2(3) of Schedule 13, if the relevant planning authority does not provide its approval for the means of access or improvement to existing means of access within 28 days, they are deemed to have provided that approval.	
Q1.5.24	The relevant highway authority			
Q1.5.25	The Applicant			
Q1.5.26	The Swaffham Internal Drainage Board			
Q1.5.27	The Applicant			
Q1.5.28	The Applicant			
Q1.5.29	Statutory undertakers			
Q1.5.30	The Applicant	**Art 21: Private rights:** Subsection (2) makes reference to Article 20 (compulsory acquisition of rights).	The Applicant does not consider it necessary to amend article 21(1) to make reference to article 18 (compulsory acquisition of land). If a reference to article 18 (compulsory acquisition of land) was to be included in article 21(1) it would	The Councils note there are examples of private rights articles in DCOs referring to the "compulsory acquisition of land" article of the relevant DCO e.g. East Anglia ONE North Offshore

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		• Should subsection (1) make reference to Article 18 (compulsory acquisition of land) in a similar manner? • Under what circumstances would subsection 2(c) be invoked? Please explain why it is needed.	introduce an ambiguity where currently there is none. The ambiguity would arise because of the way the compulsory acquisition and temporary possession powersin the DCO are structured. Article 18 starts from the position that the undertaker may acquire all of the Order land, but, in the case of the land shown in blue on the land and Crown land plans [AS-253] article 20(2) then limits that power to the acquisition of the rights over the land described in Schedule 2. Similarly, the power to acquire land in article 18 is then ousted in relation to the land shown in green on the land and Crown land plans to a power of temporary possession by virtue of article 27(6). If a reference to article 18 was introduced to paragraph (1) of article 21, there is arisk that article 21(1) could be construed as applying to all of the Order land (by disregarding the constraint in article 20(2)) rather than just the land to be acquired. This risks the unintended consequence of extinguishing all rights in such land, rather than only rights that are inconsistent with the exercise of the rights acquired through article 20. On the basis that the drafting in article 21(1) is clear and unambiguous, doesn'tgive rise to this potential unintended consequence, and that any alternative drafting solutions are likely to introduce further unnecessary complexity; the Applicant is content with the drafting of article 21(1) as it stands. In relation to article 21(2)(c) the Applicant has deleted this provision in the versionof	Wind Farm Order 2022 (art.21) and East Anglia TWO Offshore Wind Farm Order 2022 (art.21).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			the DCO submitted at Deadline 2.	
Q1.5.31	Statutory undertakers			
Q1.5.32	The Applicant			
Q1.5.33	The Applicant	•		
Q1.5.34	The Applicant	•		
Q1.5.35	The Applicant			
Q1.5.36	The Applicant			
Q1.5.37	The Applicant	•		
Q1.5.38	The Applicant	•		
Q1.5.39	Statutory undertakers			
Q1.5.40	The Applicant			
Q1.5.41	National Grid			
Q1.5.42	The Applicant	**Art 33: Consent to transfer the benefit of the Order:** • Please explain why the SoS should be satisfied with the exception in subsection (3)(b). • Is the five working days' notice in subsection (6) adequate? Would 14 days be more helpful? and	The Applicant's response to each of the points set out in the question is asfollows: The Applicant agrees to remove the reference to a subsidiary or holdingcompany from Article 33. The Applicant is comfortable amending the period in Article 33(6) to 14days, in line with recently made energy DCOs. The Applicant is comfortable with the addition of a requirement to notify the relevant planning authority in the same way as the SoS, if the transferor grant relates to the exercise of powers in its area. The Applicant agrees that Article 33 should	The Applicant's response is noted. In respect of the proposed amendment to sub-paragraph (6), should the reference to "fourteen working days" be to "fourteen days"?

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		• Should the relevant planning authority also be notified in the same way if the transfer or grant relates to the exercise of powers in its area? • To effect these modifications, should the words "and, if such transfer or grant relates to the exercise of powers in its area, to the relevant planning authority at least 14 days" be inserted in subparagraph (4) immediately after the words "Secretary of State in writing"? • If so, can subsection 6 be deleted?	be amended to reflect theabove changes, but considers that the following amendments are appropriate, consistent with other recently granted energy DCOs: *Consent to transfer the benefit of the Order* *33. […]* *(4) Where the consent of the Secretary of State is not required, the undertaker must notify the Secretary of State <u>and, if such transfer or grantrelates to the exercise of powers in its area, to the relevant planning authority,</u> in writing before transferring or granting a benefit referred to in paragraph (1).* *[…]* *(6) The date specified under paragraph 5(b) must not be earlier than theexpiry of ~~five~~ <u>fourteen</u> working days from the date of the receipt of the notification.* Per the above, the Applicant considers Article 33(6) should be retained asa separate paragraph. This approach is consistent with other recently granted energy DCOs, for example the Little Crow Solar Park Order 2022.	
Q1.5.43	The Applicant	**Art 36: Felling or lopping of trees and removal of hedgerows:** • Is this article to be subject to Article 37? • If so, should the words "Subject to article 37 (trees subject to tree	The Applicant confirms that the suggested change has been made in the updatedDCO submitted at Deadline 2 so that the words 'subject to Article 37 (*trees subject to tree preservation orders*)' are inserted at the start of Article 36.	The Councils welcome the inclusion of additional wording into Art 36: 'Subject to article 37 (trees subject to tree preservation orders)', but do not agree with the current wording of Art 37. Please see Refer to the Councils' LIR 10.222 -10.224 [REP1-924]

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		preservation orders)," be inserted at the start of subsection 36(1)?		(If Art 36 and 37 are to remain they should be amended to include the requirement for any tree works to be undertaken by a appropriately qualified person and in accordance with the BS 5837:2012). The Councils note that article 39(2) (felling or lopping of trees and removal of hedgerows) of the recently made A47/A11 Thickthorn Junction DCO 2022 (S.I. 2022/1070) provided that the undertaker must – "(b) ensure all works are carried out to a reasonable standard in accordance with the relevant recommendations of appropriate British Standards or other more suitable recognised codes of good practice provided these meet or exceed the appropriate British Standard … (d) take steps to avoid a breach of the provisions of the Wildlife and Countryside Act 1981(1) and the Conservation of Habitats and Species

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				Regulations 2017 or any successor acts and regulations". **The Councils consider art.36 would be improved if art.36(2) were amended to include these provisions.**
Q1.5.44	The Applicant	**Art 36: Felling or lopping of trees and removal of hedgerows:** Subsection 36(1) states that "The undertaker may fell or lop any tree or shrub near any part of the authorised development, or cut back its roots" • Please explain what you mean by "near"; • Given that you have a 100m wide strip of Order land within which to locate the cable route, please explain why such provision is necessary and whether it would extend outside the Order limits.	Article 36 is a model provision included in numerous made DCOs which providesthat the undertaker may fell or lop or cut back the roots of any tree or shrub near any part of the authorised development in specific circumstances. Article 36(1) sets out the specific circumstances in which the Applicant is authorised to fell or lop any tree or shrub near any part of the authorised development, which is only to prevent it obstructing or interfering with the construction, maintenance or operation of the authorised development; constituting a danger for persons using the authorised development; or obstructing or interfering with the passage of construction vehicles. It is not possible at this stage to precisely define what 'near' means in the context of this Article, as flexibility is required in order to allow the detailed design to be completed within the limits of deviation for the Scheme. Near could mean outside of the Order limits, but any trees or shrub must be within the scope of this Article and the specific circumstances in sub-paragraph (1) in which this power can be exercised, meaning it can	The Councils find that a suitable definition of near would be, "if a tree is within falling distance of the development boundary". This is unlikely to include trees beyond 20m from the boundary. For example, a 15m tree 20m from the boundary would not pose any significant risk to the site or its operatives/constructors.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			only be exercised where the Applicant reasonably believes it is necessary to prevent trees from interfering with the construction, maintenance or operation of the authorised development. The working width of the cable corridor is not 100m wide across the whole cable route. As noted in the Statement of Reasons (APP-022), the working width required for material laydown and construction equipment is expected to be 30m across the majority ofthe cable corridor; however, the working width increases to 50m and 100m along limited sections of the cable corridor where particular environmental and engineering constraints exist. This is required at specific pinch points to ensure that, if necessary, a complex engineering solution can be deployed. As confirmedabove, the powers in Article 36 could extend beyond the Order limits, subject to the requirements of sub-paragraphs (1) and (2). The provision is necessary to ensure the delivery / construction, maintenance and operation of the cable route which may require lopping, felling or cutting back of roots outside the Order limits. Were the Article not to allow such actions "near to" the authorised development, an applicant would be required to artificially and potentially unnecessarily extend the Order limits to ensure, for example, access to the site was not obstructed by atree or shrub.	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.5.45	The Applicant	**Art 36: Felling or lopping of trees and removal of hedgerows:** • Are there any important hedgerows affected by the authorised development? • If so, how and where in the dDCO are they identified?	The Applicant confirms that there no important hedgerows, as defined by the ecological criteria of the Hedgerow Regulations 1997, that would be affected by the Scheme. A single 'important' hedgerow is identified in the Terrestrial Habitatsand Flora Report at Appendix 8C of the Environmental Statement (APP-079) as being present on the northern boundary of Sunnica West Site A, but this will not be impacted by the Scheme. There are also no historically or archaeologically important hedgerows identified in the Archaeological Desk Based Assessments Appendix 7C of the Environmental Statement (APP-059), Appendix 7D of the Environmental Statement APP-060) and Appendix 7E of the Environmental Statement (APP- 061), as defined by the Hedgerow Regulations 1997 Schedule 1 part 2 Criteria foridentifying Historic or Archaeologically Important Hedgerows	Please see comment for Q1.5.43
Q1.5.46	The Applicant	**Art 37: Trees subject to tree preservation orders:** • Are there any trees subject to tree preservation orders affected by the authorised development? • If so, how and where in the dDCO are they identified?	The Applicant confirms that it will submit an arboricultural impact assessment at afuture Deadline, which will build on the assessment set out in the Environmental Statement and explain the position as to whether trees subject to Tree Protection Orders are impacted by the authorised development. Subject to the output of this assessment, the Applicant will also consider if any additional measures are required to be added to the OLEMP and framework CEMP.	Please see comment for Q1.5.43

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Additionally, a plan (and accompanying DCO schedule) will be produced that willbe referred to in article 37.	
Q1.5.47	The Applicant	**Art 37: Trees subject to tree preservation orders:** Subsection (3) refers to deemed consent. What written notice period do you propose to give?	Article 37(3) provides that the consent under paragraph 1 should be treated as deemed consent under the relevant Tree Preservation Order. It is not necessaryto specify a written notice period as part of this Article in the DCO, as how the removal of trees subject to Tree Preservation Orders will be managed will be included in both the Construction Environmental Management Plan secured by Requirement 14 for the construction period, and the Landscape Environmental Management Plan secured by Requirement 8 following the removal of the vegetation. The Applicant has updated both Requirement 8 and Requirement 14in the DCO submitted at Deadline 2 so that vegetation removal undertaken as part of permitted preliminary works is included within the scope of each requirement.	A detailed arboricultural impact assessment should provide information as to what trees will be affected by the proposals including the network connection routes (regardless of them having a TPO or not) and this information should lead the detailed design of the site
Q1.5.48	The Applicant			
Q1.5.49	The Applicant			
Q1.5.50	The Applicant			
Q1.5.51	The Applicant			
Q1.5.52	The Applicant			
Q1.5.53	The Applicant			
Q1.5.54	The Applicant	**Art 44: Traffic regulation measures:**	Article 44 (Traffic regulation measures) provides the undertaker with powers to regulate traffic on the roads for the purposes of the construction, maintenance and	Consent from the LHA would need to include approval of the traffic management layout. This is to ensure such temporary works

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Paragraph 5.6.19 of the EM (APP-020) says that these powers would be used during construction, maintenance and decommissioning. • How and in what circumstances do you see these powers being used, particularly during the maintenance period: for what purposes, and over what time periods? • Please explain why you consider that these powers are proportionate.	decommissioning of the authorised development. These powers are proportionate as they are necessary in the interests of public safety so that the construction, maintenance and decommissioning of the authorised development can be carried out safely. Without this power it would benecessary to request the traffic authority for the relevant street to make a traffic regulation Order under the Road Traffic Regulation Act 1984 each time it is required, imposing a cost and administrative burden on them, impeding the proper management of traffic during construction and ultimately delaying the delivery of the Scheme, a nationally significant infrastructure project. However, the Applicant proposes below to limit the power in Articles 44(1) and 44(2) to the construction phase only, with maintenance and decommissoning relying on Article 44(3) only (which requires the consent process). This Article is common in DCOs where it is necessary for the undertaker to put in place temporary restrictions on road useage. For example, similar provision is contained within the Network Rail (Norton Bridge Area Improvements) Order 2014, National Grid (Hinkley Point C Connection Project) Order 2016 and more recently in the Great Yarmouth Third River Crossing Development Consent Order2020. The Applicant envisages the powers conferred by article 44 being used to appropriately manage traffic in relation to	comply with the current standards and the highway remains safe for all users. Further details are given in Appendix F of the LIR [REP1-024] F.14 to F.22 and F.23 to F.27 and in SCC's ISH1 post-hearing submission [REP2-086] under the sub-heading "Agenda item 3 – articles and schedules of the dDCO" (pages 9 to 12).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			each phase of the authorised development. Construction The specific traffic regulation measure powers for construction of the authorised development are set out in paragraphs (1) and (2). Paragraph (1) provides the specific powers that relate to the extents of the roads specified in Schedule 14 ofthe DCO. Part 1 of that Schedule specifies the extent of roads that would be subject to temporary speed limits, Part 2 specifies a no right turn prohibition in relation to one temporary access to the authorised development and Part 3 specifies the roads that are to be temporarily closed to traffic. Paragraph (2) enables the undertaker to place temporary traffic signals in the locations specifiedin Part 4 of Schedule 14. Paragraph (3) also includes a general power that would authorise other traffic regulation measures, subject to the consent of the traffic authority for the road concerned and following consultation with the chief officer of police. The inclusionof this power is justified as it allows a degree of flexibility to respond to changing conditions on the road network over the lifetime of the authorised development and is subject to appropriate regulation as it may only be exercised with the consent of the relevant traffic authority. It should also be seen in the context of requirement 16 which requires the approval by the relevant county authority of a construction traffic management plan.	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Should it be necessary to adjust the Applicant's proposed traffic management measures (and described in Schedule 14 and shown on the Traffic Regulations Measures Plans (AS-284 and AS-285)) to provide a construction traffic management plan that is acceptable to the relevant county authorities, paragraph (3) provides the flexibility to do so without also imposing an administrative burden on the traffic authority to make a temporary traffic regulation order. Operation and maintenance The Applicant does not anticipate any traffic regulation measures being requiredduring the normal operation of the authorised development, as in operation the authorised development will generate an insignificant volume of traffic. To this end, the Applicant has deleted reference to "maintenance in Article 44(1) and Article 44(2). It is conceivable that circumstances could arise, for example if there was a failureof the cable necessitating repair, that it might be necessary to regulate traffic so as to enable such repairs to take place. However, any such measures would be appropriately regulated as the Applicant would need to apply for consent under Article 44(3) from the traffic authority and consult the chief officer of police concerned and would need to follow the procedures set out in paragraph (6). Decommissioning	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			As is noted in paragraph 3.8.4 of Chapter 3 of the Environmental Statement (AS- 299), the effects of decommissioning are similar to, or often of a lesser magnitudethan construction effects. However, there can be a high degree of uncertainty regarding decommissioning as engineering approaches and technologies are likely to change over the operational life of the Scheme. Section 2.6 of the Framework Decommissioning Environmental Management Plan (APP-125) requires a decommissioning traffic management plan (including a decommissioning worker travel plan) to be produced in consultation with the appropriate local planning authorities and which will use as its starting point, the measures set out in the Framework Construction Traffic Management Plan and Travel Plan. Requirement 22 of the draft DCO requires the submission for the approval of the relevant planning authority, of a decommissioning environmental management plan that must be substantially in accordance with the Framework Decommissioning Environmental Management Plan and subsequent compliance with the approved plan. Consequently, at this point in time, the Applicant envisages that when decommissioning the authorised development it would exercise its powers underArticle 44(3) and as such as deleted	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			reference to "decommisioning" in Articles 44(1) and 44(2).	
Q1.5.55	The Applicant	**Art 44: Traffic regulation measures:** Paragraph 5.6.19 of the EM (APP-020) says that subsection (3) would authorise "other temporary traffic regulation measures". • What measures? and • Why are they needed?	As noted in response to question 1.5.54, paragraph (3) also includes a general power that would authorise other traffic regulation measures. The inclusion of thispower is justified as it allows a degree of flexibility to respond to changing conditions on the road network over the lifetime of the authorised development. This is necessary to ensure that the Applicant is able to maintain and decommission the Scheme at a future point in time, as required by the DCO. As noted above, the traffic authority must provide its written consent prior to any of the powers in Article 44 being used. See the answer to Q1.5.54 above for a moredetailed explanation.	The Councils consider the powers under art.44(3) are wide and, for a DCO applicant which is not a highway authority, unprecedented. Two of the three cited precedents for this provision (art. 38 of the Network Rail (Norton Bridge Area Improvements) Order 2014 and art.40 of the National Grid (Hinkley Point C Connection Project) Order 2016) are not as broad and relate to the construction phase only. While the drafting of art.44(3) is close to that of the third cited precedent (art.18(2) of the Great Yarmouth Third River Crossing DCO 2020) the Great Yarmouth Order was promoted by Norfolk County Council, the local highway authority, which was already the traffic authority for the affected roads. The Councils are unaware of any DCO providing powers for the undertaker to seek traffic regulation powers during the decommissioning phase.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.5.56	The Applicant	**Art 44: Traffic regulation measures:** In subsection (3)(a) • what is meant by "vehicles"? Does it include emergency vehicles? • What is meant by "any road"? is it a reference to roads specified in Schedule 14?	In the absence of any legal definition, "vehicles" is taken to have its ordinary meaning, which includes emergency vehicles. The 'blue light' exemptions in existing traffic legislation and regulations will still apply as nothing in the traffic regulation measures made under this DCO would prevent reliance on those exemptions. This includes, for example, the exemption under section 87 Road Traffic Regulation Act 1984 of fire brigade, ambulance and police vehicles fromspeed limits. The reference to 'any road' means all roads and not just those specifically referenced in Schedule 14. Whilst this power appears to be broad in scope, the power may only be exercised for the purposes of the construction, maintenance or decommissioning of the authorised development. Its exercise is subject to the written consent of the traffic authority concerned following consultation with the relevant chief officer of police.	The Applicant's response is noted. Please see The Councils' response to Q1.5.55.
Q1.5.57	The Applicant	**Art 44: Traffic regulation measures:** Subsection (6)(a) provides for 4 weeks' notice in writing to be given to the chief officer of police and to the traffic authority. Could such information also be provided to users of the highways in question through	The Applicant confirms that the Construction Environmental Management Plan submitted at Deadline 2 has been updated to include a commitment for the appointed contractors to develop a Communication Strategy to ensure effectiveand open communication on traffic regulation measures is undertaken with relevant stakeholders, including the relevant planning authorities, local stakeholders and the public. This will include sharing information and advancedwarning of the proposed traffic regulation measures with users of the highways.	Please see SCC's ISH1 post-hearing submission [REP2-086] regarding SCC's proposed amendments to art.44, including a requirement to consult highway users. (The proposed amendments are set out on page 11 of that document).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		implementation of a Communications Strategy?		
Q1.5.58	The relevant highway authority/traffic authority			
Q1.5.59	The Applicant/The Crown Estate			
Q1.5.60	The Applicant			
Q1.5.61	The Applicant			
Q1.5.62	The Applicant			
Q1.5.63	The Applicant			
Q1.5.64	The Applicant			
Q1.5.65	The Applicant			
Q1.5.66	The Applicant			
Q1.5.67	The Applicant	**Schedule 2: Requirements:** Requirement 7 provides for a battery fire safety management plan, and paragraph 6.2.13 of the EM [APP-020] states that *"a Battery Fire Safety Management Plan ("BSFMP"), substantially in accordance with the outline battery fire safety management plan, must be*	Taking each of these points in turn: The Applicant confirms that the next version of the Explanatory Memorandumwill be updated so that it reads ("BFSMP"). The Applicant's view is that the plan has been called the battery fire safety management plan for simplicity and the name of the plan is sufficiently clear. Without the term "substantially", "in accordance with" can be construed as meaning exactly the same as. This is not appropriate for Requirement 7, or indeed any other Requirement in the draft DCO, as	The Councils' view is that the County Councils should be the discharging authorities for this requirement as Suffolk County Council is the Fire & Rescue Authority for Suffolk, and Cambridgeshire County Council governs the Cambridgeshire and Peterborough Fire Authority jointly with Peterborough City Council.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		submitted and approved by the Relevant Planning Authorities before commencement of Work No. 2 of the authorised development". • Should BSFMP read BFSMP? • Would it be clearer if this were entitled "battery energy storage system (BESS) fire safety management plan"? • In section (3), for the avoidance of doubt please delete the word "substantially" so that it is clear that the plan must be in accordance with the outline referred to; and • Should the emergency services such as the East of England Ambulance Service also be consulted?	it is an 'outline' battery firesafety management plan that sets the outline for the final plan to be developed based on the detailed design of the Scheme and any updated in legislation or guidance. It is therefore important that the term "substantially" remains as part of this Requirement in order to build in the flexibility needed for the plan to be developed in accordance with the greater level of detail that will be known at a later stage. The Applicant confirms that the emergency services are consulted as part of approving the battery fire safety management plan. Requirement 7 (fire safetymanagement) of the draft DCO states that Work No. 2 must not commence until a battery fire safety management plan has been submitted to and approved by both relevant planning authorities. Whilst the responsibility is on the relevant planning authorities to approve the plan, Requirement 7 requires both relevant planning authorities to consult with the relevant fire services, being Cambridgeshire Fire and Rescue Service and the Suffolk Fire and Rescue Service, before determining an application for approval of the battery fire safety management plan. Requirement 7 has been updated in the draft DCO submitted at Deadline 2 to include the Health and Safety Executive as one of the bodies that the relevant planning authorities must consent before determining an application for approval. This secures the need for the relevant local planning	Details are set out at page 13 of SCC's ISH1 post-hearing submission [REP2-086] regarding R7.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			authorities to get input from the fire services and the Health and Safety Executive as part of approving the final plan prior to commencement of Work No. 2. The Applicant's view is that the East of England Ambulance Service does not need to be consulted as part of approving the plan as this is a fire safety plan so it is not necessary, and in any event, they have not requested to be consulted. Please see the responseto Q1.1.18.	
Q1.5.68	The Applicant			
Q1.5.69	The Applicant	**Schedule 2: Requirements:** Requirement 8 provides for a landscape and ecology management plan. • In section (1), line 2, for the avoidance of doubt please delete the word "substantially" so that it is clear that the plan must be in accordance with the outline referred to. • Should reference be made to the associated work programme? • In respect of landscaping works, o should reference be made to compliance with the relevant	With respect to the first point on the inclusion of the word "substantially" please see the Applicant's response at Q1.5.67. For the reasons set out in that response, the Applicant does not propose to make this change. The Applicant is unclear as to the reference to the "associated work programme"as this is not a document that the Applicant has submitted to the Examination. The measures secured by this requirement are to be found in the Outline Landscape and Ecology Management Plan [APP-108] (OLEMP) which sets out measures to mitigate or avoid visual and ecological impacts, including any programme considerations in that respect. The OLEMP also sets out details of ongoing management and monitoring requirements. The approach taken (i.e. securing mitigation measures in a landscape and ecology management plan) is astandard approach for onshore energy projects, and the	Establishment of trees in the first 5 years The Councils consider that reference should be made to compliance with the relevant British Standards and the need for tree and shrub replacement should be referred to. The Councils consider that the aftercare period should be for a minimum period of 5 years (see LIR REP1-024, section 10.232), but this should be predicated on the successful establishment of the plants. A dynamic approach to aftercare should be provided.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		recommendations of the relevant British Standards? and ○ should reference be made to the need for replacement of any tree or shrub planted as part of the approved landscape and ecology management plan which within a period of five years after planting is removed, dies, or becomes seriously damaged or diseased?	Applicant considers it is appropriate. With respect to the question on the relevant British Standards, the OLEMP references British Standard 5837: 2012 Trees in relation to design, demolition and construction — Recommendations, and the Applicant has updated the OLEMP to confirm the landscaping works will comply with the recommendationsof other relevant British Standards. The OLEMP includes management, maintenance and monitoring provisions at section 1.8. With respect to trees, maintenance actions are set out at 1.8.13 andinclude checking and recording failed or defective plants, and replacement of failed or defective plants. At section 1.7, the proposed green infrastructure is set out and at paragraph 1.7.41 the OLEMP sets out measures in relation to trees asfollows: *All new tree plantings would be subject to the maintenance regimes, in which all plants found to be dead or dying would be replaced within the first available planting season. If areas of trees are seen to be failing, soil samples may be needed to identify potential soil issues affecting tree health. Either soil remediation would be required or, if not practical, a more suitable tree species or location would be chosen. Following the completion of the initial five-year aftercare period all new planting plots will undergo an annual condition assessment and an appropriate programme of works developed to address changes in condition and site requirements. Such work may include;*	Dynamic aftercare is a landscape aftercare supervision structure that addresses the quality and annual growth of different blocks of tree and shrub planting, with monitoring against agreed objectives, with the option to suspend / extend the management periods for discrete areas of such planting (or zones) and target specific measures to improve such areas, in cases where the planting does not establish satisfactorily for any reason.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			additional replacement planting, tube/stake removal, pruning, coppicing, or thinning out of plots to encourage establishment. Approval and implementation of the Landscape and Ecological Management Planis secured by Requirement 8 of the DCO, and the Applicant therefore considers that appropriate measures are secured with respect to management of trees or shrubs.	
Q1.5.70	The Applicant			
Q1.5.71	The Applicant	**Schedule 2: Requirements:** Requirement 12 provides for surface and foul water drainage. • In section (2), ○ what and where is the drainage strategy? ○ is an outline to be submitted and, if so, when? and ○ for the avoidance of doubt please delete the word "substantially" so that it is clear that the surface water drainage strategy must be in accordance with the drainage strategy.	Taking each of these points in turn: The drainage strategy is defined in Article 2(1) of the DCO as the document of that name identified in the table at Schedule 10 (*documents and plans tobe certified*) and which will be certified by the Secretary of State as the drainage strategy for the purposes of the DCO. Schedule 10 sets out that thedrainage strategy can be found at Annex F to Appendix 9C Part 4 contained in Volume 2 of the Environmental Statement (APP- 098). The accompanying plans for the drainage strategy for Sunnica East A and B can be found at Figure 3-15 in Volume 3 of the Environmental Statement (APP-154) and for Sunnica West A and B at Figure 3-16 of Volume 3 of the Environmental Statement (APP-155). The drainage strategy at Annex F to Appendix 9C Part 4 contained in Volume2 of the Environmental Statement (APP- 098) that has already been submitted is the outline drainage strategy for the Scheme. This will be developed into the surface water drainage strategy that will be submitted to	The Applicant's response is noted. Regarding the inclusion (or otherwise) of "substantially" the Councils note that the equivalent requirement of the Sizewell C (Nuclear Generating Station) Order 2022 does not include "substantially". Requirement 5(3) of that Order states – "(3) The surface and foul water drainage details must be based on sustainable drainage principles and must be in accordance with the drainage strategy."

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			the relevant county authorities for approval in accordance with Requirement 12. Without the term "substantially", "in accordance with" can be construed as meaning exactly the same as. This is not appropriate for Requirement 12, or indeed any other requirement in the draft DCO, as it is an 'outline' drainage strategy that sets the framework for the final strategy to be developed into based on the detailed design of the Scheme. It is therefore important that the term "substantially" remains as part of this Requirement so there is flexibility for the plan to be developed in accordance with the greater level of detail thatwill be known at a later stage.	
Q1.5.72	The Applicant			
Q1.5.73	The Applicant	**Schedule 2: Requirements: drafting** Requirement 14 provides for a construction environmental management plan. • In line 2, please delete the words "by substantially" and replace them with the word "be", both to make sense and to ensure that the construction environmental management plan is in accordance with the framework construction	The Applicant considers the requested change to the drafting of Requirements 14, 15 and 16 is not necessary or appropriate to achieve the objectives stated inQ1.5.73-75. The drafting in question is clear in terms of what it is intended to achieve. A requirement for the detailed construction environmental management plan(s), operational environmental management plan and construction traffic management plan to be "substantially" in accordance with the relevant outline plans demands a high level of consistency — the substance of the detailed plans must be in accordance with their outline versions. This means that the key elements of these plans, including the mitigation measures secured, must be included in the detailed plans. Critically,	The Councils would agree with the ExA's recommended changes to requirements 14, 15, and 16

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		environmental management plan.	however, the chosen drafting provides sufficient flexibility for certain aspects of the detailed plans to be developed and/ordiffer slightly from the outline versions, should this be required in order to respondto unforeseen variances or advances in technology, for example. Without the term "substantially", "in accordance with" can be construed as meaning exactly the same as. This is not appropriate for Requirements 14-16 asit is an 'outline' document that sets the framework for the final strategy or plan tobe developed into based on the detailed design of the Scheme. It is therefore important that the term "substantially" remains as part of this Requirement so there is flexibility for the plan to be developed in accordance with the greater levelof detail that will be known at a later stage.	
Q1.5.74	The Applicant	**Schedule 2: Requirements: drafting** Requirement 15 provides for an operational environmental management plan. • In line 2, please delete the word "substantially" and replace it with the word "be", both to make sense and to ensure that the operational environmental management plan is in accordance with the framework operational	See above.	Please see SCC's response to Q1.5.73.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		environmental management plan.		
Q1.5.75	The Applicant	**Schedule 2: Requirements: drafting** Requirement 16 provides for a construction traffic management plan. • In line 2, please delete the word "substantially" and replace it with the word "be", both to make sense and to ensure that the construction traffic management plan is in accordance with the framework construction traffic management plan.	See above.	Please see SCC's response to Q1.5.73.
Q1.5.76	The Applicant			
Q1.5.77	The Applicant	**Schedule 2: Requirements:** Requirement 16 refers to a framework construction traffic management plan. • Is this plan the same as the framework construction traffic management plan and travel plan submitted with the application [APP-118]?	The framework construction traffic management plan (framework CTMP) referredto in Requirement 16(1) is defined in Article 2 of the draft DCO. The framework CTMP is defined as the document of that name, identified in Schedule 10, and certified as the "framework construction traffic management plan". Schedule 10 lists the framework CTMP, giving the document reference as Appendix 13C, Volume 2 of the Environmental Statement, Applicant's document ref 6.2. The revision no. and date of the framework CTMP are also provided. The title on thatdocument is Framework	The Applicant's response is noted. The Councils' concerns with the FCTMP are set out in the LIR [REP1-024]. (For instance, at paragraph 13.62 onwards).

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		• Does it include a framework access management plan and a framework travel plan? If not, where are they provided for?	Construction Traffic Management Plan and Travel Plan [APP-118]. Therefore, in answer to the first question, the framework CTMP in the draft DCO is the same as the Framework Construction Traffic Management Plan and TravelPlan [APP-118] submitted with the Application. The Applicant has set out above how that is made clear in the drafting of the Order. The framework CTMP includes all necessary mitigation measures required in association with traffic and travel during the construction period. The Applicantdoes not consider that any other additional plans are required.	
Q1.5.78	The Applicant			
Q1.5.79	The Applicant			
Q1.5.80	The Applicant			
Q1.5.81	The Applicant			
1.6	**Environmental Statement – general matters**			
Q1.6.1	The Applicant			
Q1.6.2	The Applicant			
Q1.6.3	The Applicant			
Q1.6.4	The Applicant			
Q1.6.5	The Applicant			
Q1.6.6	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.6.7	The Applicant	**Long-term management of ecological mitigation land** Please explain how long-term management of ecological mitigation land will be secured following decommissioning.	The Scheme will have a maximum operational life of 40 years and the land will bereturned to the landowners at the end of this period, following decommissioning. The management of ecological mitigation land after decommissioning will therefore no longer be under the control of the Applicant. The Scheme will not remove landscape or ecological enhancements at the point of decommissioning. Only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125]. If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent (if granted),a landowner decides to remove vegetation, this would be subject to applicable planning and/or licensing requirements at that point in time. However, to assist the landowners with the long-term management of ecological mitigation land after the decommissioning, the Applicant will share the Operational Environmental Management Plan with landowners prior to decommissioning, so that they can incorporate management principles for theselandscape and ecological enhancement areas into their own working practices.	The Councils' views on this can be found at LIR paras 8.163-8.165 [REP1-024]
Q1.6.8	The Applicant			
Q1.6.9	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.6.10	The Applicant			
Q1.6.11	The Applicant			
Q1.6.12	The Applicant			
1.7	**Landscape and Visual Effects**			
Q1.7.1	The Applicant			
Q1.7.2	The Applicant			
Q1.7.3	East Cambridgeshire District Council (ECDC)			
Q1.7.4	Suffolk County Council (SCC)			
Q1.7.5	The Applicant			
Q1.7.6	Suffolk County Council (SCC)			
Q1.7.7	The relevant local authorities			
Q1.7.8	East Cambridgeshire District			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
	Council (ECDC)			
Q1.7.9	The Applicant			
Q1.7.10	The Applicant			
Q1.7.11	The Applicant	**Trees & woodland** With reference to Environmental Statement Chapter 10, Landscape and Visual Amenity [APP-042] paragraph 10.3.4, please explain why you it consider it appropriate not to have undertaken a detailed Arboricultural assessment at the application stage?	The design has been developed to avoid and minimise impacts to trees and hedgerows from the outset. This has been informed by high level tree assessment data and site walkovers by qualified arboriculturists which mapped the likely quality and spatial constraint associated with trees, which the design then sought to avoid where feasible. The detailed design is not fully defined and will not be for some time and therefore this process is ongoing. The applicant is confident that loss or damage to significant trees has and can be avoided via thedetailed design process and the principles set out in the Precautionary Arboricultural Method Statement included as Annex C of the Tree Constraints Report [APP-101] and secured by the CEMP. However, the Applicant has, further to discussions with stakeholders, undertaken further work in relation to trees and the intention is that this will be submitted to Examination at a future Deadline in the form of an Arboricultural Impact Assessment.	Refer to the Councils joint LIR section 10.101 The Applicant states 'The design has been developed to avoid and minimise impacts to trees and hedgerows from the outset. This has been informed by high level tree assessment data and site walkovers by qualified arboriculturists which mapped the likely quality and spatial constraint associated with trees, which the design then sought to avoid where feasible.' However, hedges and trees were missed in several locations.
Q1.7.12	The Applicant			
1.8	**Noise and Vibration**			
Q1.8.1	The Applicant,			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
	relevant local authority			
Q1.8.2	The Applicant			
1.9	**Socio-Economics and Land Use**			
Q1.9.1	The Applicant			
Q1.9.2	The Applicant			
Q1.9.3	The Applicant			
Q1.9.4	The Applicant			
Q1.9.5	The Applicant			
Q1.9.6	The Applicant			
Q1.9.7	The Applicant			
Q1.9.8	The Applicant			
1.10	**Traffic, Transport and Highway Safety**			
Q1.10.1	The Applicant			
Q1.10.2	The Applicant			
Q1.10.3	The Applicant			
Q1.10.4	The Applicant	**Other projects - A11 Barton Mills/Fiveways junction** Improvement of the nearby A11 Fiveways junction at Barton Mills is in the National Highways five-year delivery plan for 2020 to 2025. How has this been taken into account in your plans for the	The improvements to the A11 Fiveways junction are intended to improve the operation of the junction. Therefore, those travelling to/from the scheme via the A11 Fiveways would benefit through the improvements of the Fiveways junction once those works have been completed. In the event of diversions or closure of the A11 or the Fiveways junction during construction period of that improvement scheme, the construction vehicles travelling to or from	It is the Councils' understanding that the A11 Fiveways scheme forms a pipeline scheme that is in the early stages of consideration for the third route period of 2025 to 2030: Pipeline of possible future schemes - National Highways. Given the amount of current detail on the scheme, and that there is

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		construction and operation of the proposed development? Are there any other projects which need to be taken into account?	the Sunnica Energy Farm would follow the signposted diversions. Any diversions and traffic management that National Highways put in place for any works on the Strategic Road Networkwill need to be suitable to accommodate all traffic on the network, of which the proportion associated with Sunnica is minimal. It is therefore reasonable to conclude that the use us any diversionary routes would not result in additional impacts requiring assessment. In addition, National Highways has made the Applicant aware of plans for gap closures of the A11 between Red Lodge and Fiveways. The proposed scheme consists of three gap closures and is scheduled for 2022-2023. Given the scheduling of this scheme, it is likely to be complete prior to commencement of construction. In the event that it is delayed, construction traffic travelling to/from the Sunnica Energy Farm will follow any signposted diversions if required. As stated above, any diversions and traffic management that National Highways putin place for any works on the Strategic Road Network will need to be suitable to accommodate all traffic on the network, of which the proportion associated with Sunnica is minimal. It is therefore reasonable to conclude that the use us any diversionary routes would not result in additional impacts requiring assessment.	only a commitment towards further work, the Councils would not see it as a 'committed scheme'. The Councils would note that if the A11 Gap Closure scheme is implemented all traffic exiting the C576 Newmarket Road (Barton Mills) would be required to travel to the A11 Fiveways Roundabout and southbound traffic u-turn to return towards Newmarket. As the impacts would be on the SRN we will leave any comments on these to National Highways.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.10.5	The Applicant	**Abnormal loads** Do you envisage plant and materials being imported through ports? If so, which ones have you considered? and Which routes would you use for abnormal loads to access the various parts of the proposed development?	It is envisaged that plant and materials would be imported using ports. At this stage it is not yet known precisely which port would be used. Consideration has been given to the use of Ipswich Docks or Immingham Docks with Southampton Docks and Liverpool Docks considered unlikely at this stage, given the distance from the site. The port used will have well established road access infrastructurefor use to transport abnormal loads to the Strategic Road Network. The A14 andA11 form the parts of the Strategic Road Network which will be used to transportabnormal loads to the vicinity of the site. As part of the Framework Construction Traffic Management Plan and Travel Plan [APP-118], a route review for cranes and Abnormal Indivisible Loads (AILs) was undertaken from the A14 and A11 to the required site accesses. The routes whichare included within the reviews and the swept path analysis of the AILs are shownin Figure 21 in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. These routes include the A11 to Elms Road to access Sunnica East Site B and A11 to La Hogue Road to access Sunnica West Site A. In addition, the A11 wouldbe used to access Sunnica East Site A via the B1105 and B1102. The route to National Grid Substation at Burwell has been identified via the A14, B1103, Reach Road and Weirs Drove.	Paragraph 5.13.10 of EN-1 states that water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective. Using Immingham or Southampton Docks would not appear to compliant with this policy. The applicant should not assume that the SRN is capable of carrying all AILs as a number of structures (e.g. A14 Hillhouse Viaduct, Stowmarket) have weight or height limitations, which is why special-order movements to Burwell from Ipswich have in the past been routed via local roads through Newmarket and Stowmarket. For East Anglia 1 (North) the lack of certainty regarding a defined port was resolved by securing an Outline Port Traffic Management and Travel Plan, which is available to view here: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005402-ExA.AS-5.D12.V5%20EA1N%20Outline%20Port%20Construction%20Traffic

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			The route review identified that there was a practical and achievable route fromthe Strategic Road Network to the site accesses that were required. In places, temporary signage removal was identified to accommodate the crane or AIL swept paths. The swept path analysis for the AILs is provided within the updated Framework Construction Traffic Plan Management and Travel Plan [AS-300, AS-301] and have superseded the information provided in Appendix C of the Framework Construction Traffic Management Plan and Travel Plan [APP-118].	%20Management%20and%20Travel%20Plan.pdf
Q1.10.6	The Applicant	**Abnormal loads** Is there a report giving a detailed operational assessment of the routes to be used for access to the various parts of the site by abnormal loads, giving details of matters including vehicle configurations, structural restrictions, structural assessments, route inspections, parking restrictions, traffic management, temporary diversions (particularly for emergency vehicles), movement timings under police escort, and removal	The report to be referred to is the updated Framework Construction Traffic Management Plan and Travel Plan, and the document references are AS-300 and AS-301, which demonstrates the accessibility of the site from the Strategic Road Network. The vehicle configuration of the AILs are identified in Figure 14 - Figure 19. Other than the weight limit of the bridge at the Ferry Lane / Isleham Road junction (Unique Street Reference Number: 14601046), which is discussedin Q1.10.12, and in paragraphs 5.6.3 and 5.6.4, no other structural restrictions have been identified. The finalised route of the abnormal vehicles will be identified and planned by an experienced haulier in compliance with the regulations that govern the movements of abnormal loads on the highway network. At this stage no temporary diversions are considered required as the AILs are expected to be escorted to the proposed	The Councils note that the applicants commitment to engage with an experienced haulier to finalise routes for AIL movements. However, in other cases, this engagement has been undertaken prior to or during their respective examinations. For example, by both Sizewell C and Scottish Power Renewables (the promoter of East Anglia 1 North offshore wind farm). These studies included the full route from port of origin to the site, not just the route through local roads from the SRN. For reference, the relevant document for EA1(N) can be viewed here:

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		and replacement of street furniture? If so, please provide it and summarise its contents and conclusions.	scheme. The street furniture required to be temporarily removed to allow the AILs to pass are identified throughout Chapter 5 of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. At this stage, the Construction Traffic Management Plan and Travel Plan [APP-118] is a Framework document, and the full Construction Traffic Management Plan will be produced by an experienced contractor. The Framework ConstructionTraffic Management Plan establishes the parameters and ensure that the proposed Scheme is deliverable in providing access for the required AILs. The updated Framework Construction Traffic Management Plan and Travel Plan document references are AS-300 and AS-301. Requirement 16 contained in Schedule 2 of the draft DCO requires the relevant county authority's approval of the Construction Traffic Management Plan before the commencement of the development. In addition, the locations at which it is proposed to temporarily remove street furniture to enable the passage abnormal loads are listed in Part 2 of Schedule 5to the draft DCO and are shown on the Access and Rights of Way Plans [AS-257].The Applicant confirms that temporary removal of street furniture includes the prompt reinstatement of that furniture once the relevant vehicles havecompleted their transit.	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001388-6.3.26.3%20EA1N%20ES%20Appendix%2026.3%20Abnormal%20Indivisible%20Load%20Access%20to%20Onshore%20Substation.pdf The Councils consider that assessment of the whole route from a suitable port to the site accesses is necessary to determine which SRN and local highway structures would be affected and allow at least an initial screening operation to identify any sites of concern. The structural capacity of LHA assets is subject to change and even if routes have been used for past movements there is no guarantee that the condition of any structure remains acceptable. For further information see 13.55 to 13.60 in the LIR (REP1-024) With respect to specific concerns regarding the AIL routes as detailed in Appendix P of the change request [AS-276], the Councils have identified the following issues:

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				• B1102 The Street, Mildenhall Road, Freckenham (Plate 6). The blue line (wheel path 2.2.5)) clearly runs over the circular island at the junction. The applicant states that they have only considered trimming of vegetation at this location (4.1.1). The area is included within the order limits but no information has been provided on any works here. The Councils would note that these could damage the roots for the tree within the island. • B1103 Swan Lane / Oxford Street Junction, Exning (Plate 11). It is noted that the oversailing load is immediately adjacent to The White Swan Public House. The base map is derived from ordnance survey and the Councils would draw the applicant's attention to potential errors in such map and in this

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				specific case the presence of gutters, down pipes and roof overhang associated with the building. To SCC's knowledge the highway boundary at this location has not been determined. • High Street/ Park Road B1085, (Chippenham) The return bend where the driveway to Chippenham Hall joins the B1085 has not been shown. While the developer might consider there not to be an impact, details for all relevant bends should be provided even to justify that there will be no impact. • Newmarket Rd (B1103)/Isaacson Road junction, Burwell. (Plate 10) The highway extent must be verified to confirm if there is oversailing of the verge. Confirmation of vegetation to be cleared and appropriate surveys needed.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				• Reach Road(B1103)/Weirs Drove, Burwell (Plate 13). While Plate 13 includes dimensions, the central island shown does not appear to accurately represent the island seen on site. Confirmation of vegetation to be cleared and appropriate surveys needed. • 'S'- Bend on Weirs Drove, Burwell (Plate 12). While described as 'remaining within the highway during its transit of both bends', the transit of the eastern bend shown on plate 13 shows it to overhang the ditch. While no verified highway extent is shown on plan, it appears likely that this ditch is riparian owned. It is indicated that two trees may require pruning. The trunk of one of these trees is shown fully within the swept path and is likely to be entirely compromised by this proposal.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				• Weirs Drove/ Newnham Drove Junction, Burwell. (Plate 14). While it is indicated that 'the trailer will over sail the inside grass verge by approximately 8m but the vehicle will remain within the highway', it appears on plate 14 to overhang the ditch on the north-western corner. While no verified highway extent is shown on plan, it appears likely that this ditch is riparian owned.
Q1.10.7	The Applicant	**Abnormal loads - cranes and transformers** Please confirm that both cranes and transformers will be AIL. Will there be any other loads which are AIL? Will there be any abnormal loads which are not AIL? If so, please explain.	It is correct that cranes and the vehicles used to transport the transformers will be AILs. The vehicles to be used to transport the transformers are expected to be either STGO CAT 2 or STGO CAT 3 low loader. The Government Guidance on abnormal loads identifies an AIL to be a vehicle with any of the following: A weight more than 44,000kg An axle load of more than 10,000kg for a single non-driving axle and11,500kg for a single driving axle A width of more than 2.9 metres A rigid length of more than 18.65 metres. The number of AILs are outlined within the Framework Construction Traffic	Whilst the numbers provided at Table 2-2 of APP-118 for AIL movements are those *'expected'* for the project. There is no control or monitoring of these movements within the Construction Traffic Management Plan and therefore no guarantee that the actual numbers will be limited to this amount nor that loads will remain within the STGO3 category.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Management and Travel Plan [APP-118] in Table 2-2. An update of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS- 301] has been provided with further explanation provided regarding the definition of an AIL above and also in paragraph 2.3.13 of the update Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. Due tothe length and weight of the cranes and the size of the transformers, the vehicles are all expected to be AILs. For the purposes of the scheme assessment and ensuring that construction routes can accommodate the largest vehicles expected to use the site, all abnormal loads are considered to be AILs. In some instances, there may be opportunities for Abnormal Loads to be dividedinto smaller delivery vehicles. However, for the purposes of the assessment, theworst-case of the loads being indivisible has been assumed.	
Q1.10.8	The Applicant			
Q1.10.9	The Applicant	**Abnormal loads - trips and routes** In paragraph 1.1.4 e of the Transport Assessment [APP-117] you quote up to 16 abnormal indivisible loads (AIL) per substation, 52 in total.	Paragraph 1.1.4 e_ of the Transport Assessment confirms that 'up to' 16 abnormal indivisible loads (AILs) are required per substation with 52 in total. It is confirmed that this total includes the substation extension at Burwell, if Option 2 were to proceed. However, as set out in the Applicant's Change Request [AS-243] the total number of AILs is expected to be reduced if the Applicant proceeded with Option3 because it would decrease the	While the numbers provided at Table 2-2 of APP-118 for AIL movements are those 'expected' for the project, there is no proposed control or monitoring of these movements within the Construction Traffic Management Plan and therefore no guarantee that numbers are limited to this amount.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		i) Do these figures include the substation extension at Burwell? ii) How many other abnormal loads will there be? iii) What will be the total number of trips (ie delivery trip plus return trip)? iv) Which routes are specified for each delivery location? And v) What physical mitigation measures, temporary or permanent, will be required?	number of AILs as a result of there being one fewer substations required for the overall project (see row 13 of table 5-1 of the Applicant's Proposed Changes Application (AS- 243). If the Applicant were to proceed with Option 2 the number of AILs quoted in paragraph 1.1.4 e of the Transport Assessment would remain unchanged, this is confirmed in row 13 of Table 4-1 of the Applicant's Proposed Changes Application [AS-243]. No other abnormal loads are anticipated, I.e. there will be a maximumof 52 in total throughout the construction. The numbers identified in Table 2-2 of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] and also in theupdated version of that document submitted with the Applicant's Proposed Changes Application [AS-300, AS301] are the number of vehicles associated with all of the sub-stations contained within the respective sites. Therefore, there would be one inbound trip and oneoutbound trip associated with each of these vehicles. The haulier of the AIL will undertake a detailed route review for eachAIL. However, the route review provided within the main body of the Framework Construction Traffic Management Plan and Travel Plan [AS-300] and demonstrates there is a viable route from the StrategicRoad Network to the required site accesses for the AILs. The routes which are included within the route reviews and the sweptpath analysis of	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			the AILs are shown in Figure 21 in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] submitted with the Applicant's Proposed Changes Application. These routes include the A11 to Elms Road to access Sunnica East Site B and A11 to La Hogue Road to access Sunnica West Site A. In addition to this, the A11 would be used to access Sunnica East Site A via the B1105 and B1102. The route to National Grid Substation at Burwell has been identified via the A14, B1103, Reach Road and Weirs Drove. The temporary works to facilitate the passage of the AILs are identified within Framework Construction Traffic Management Plan and Travel Plan [APP-118] with the physical temporary works including temporary removal of street furniture to accommodate the swept path of the AILs where it overhangs the verge referenced throughout Chapter 5 of the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. All the identified measures are temporary and are reflected in Part 2 of Schedule 5 to the draft DCO [AS-293] to be carried out at the corresponding locations shown on Access and Rights of Way Plans [AS-257]. No permanent physical mitigation works are required	
Q1.10.10	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.10.11	The Applicant	**Abnormal loads - access to Sunnica East Site A** Pages 16 and 17 of Annex D to ES Appendix 13C [APP-118] describe the proposed crane access route to Sunnica East Site A from the A11 northbound, via the B1085 through Chippenham, the B1104 and the B1102 to Ferry Lane. i) Will this route also be used for access by transformers? and ii) if the crane is to access the site from the north via the A11 southbound, how will this be achieved?	Swept path analysis has been undertaken for the vehicle that wouldtransport the transformer using a 46.63m (long) AIL with the information provided within the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. The updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] has superseded the information provided in Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118]. This demonstrates the AIL used to transport the transformer can use the same route as the crane route originally set out in the Framework ConstructionTraffic Management Plan and Travel Plan [APP-118]. (ii) If the crane/AIL accessed the site from the north it would be expectedthat this would be via the A11 southbound off-slip and via the Red Lodge Dumbbell Roundabouts and via Elms Road. The haulier of theAIL will undertake the final route review, if that route is required. However, the route review provided within the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS- 301] demonstrates there is a viable route from the Strategic Road Network to the required site accesses.	Please see the Councils'response to Q1.10.6
Q1.10.12	The Applicant	**Abnormal loads - access to Sunnica East Site A**	The bridge in question is owned and maintained by Historical Railways Estate (on behalf of Department for Transport). This was identified during email correspondence	While the swept path shows that the wheeltrack of the transporter will remain within the limits of the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Pages 16 and 17 of Annex D to ES Appendix 13C [APP-118] describe the proposed crane access route to Sunnica East Site A, via the B1085 through Chippenham, the B1104 and the B1102 to Ferry Lane. Paragraph 5.6.4 of ES Appendix 13C [APP-118] states that *"the weight limit of the bridge on Ferry Lane is 44 tonnes".* Please i) Advise who owns and maintains the bridge; ii) supply swept path diagrams for the bridge and for the junction; iii) supply vertical clearance diagrams for the bridge; iv) advise in which direction the photograph at Figure 32 has been taken; v) give an update in respect of the weight restriction on the bridge; vi) advise of any measures, particularly in respect of the bridge, which would make the route viable;	in May 2021 with National Highways (previously Highways England) and HistoricalRailways Estate. As a result of the bridge weight limit, an alternative route was identified via Beck Road which did not require the AILs/cranes to pass over the bridge. Therefore, no vehicle swept paths were undertaken of an AIL/crane over the bridge in question as it is notproposed to be used for such vehicles. The vehicle is not proposed to travel under the bridge, so no vertical clearance diagrams are required. Swept paths of the AILsare provided accessing the scheme via Sunnica East Site A: Site Access K located on Beck Road as shown in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] Google Earth Aerial Photography is provided in Figure 32 and is therefore taken from a birds eye view of the proposed site accesswith La Hogue Road running in a north-south direction. As a result of the bridge weight limit, an alternative route was identified via Beck Road which did not require the AILs/Cranes topass over the bridge. Therefore no update is needed. An alternative route has been identified and therefore there is noneed for measures in respect of the bridge to make the route viable. And (viii); It is confirmed the AIL route identified in Framework Construction Traffic Management Plan and Travel Plan [APP-	highways as shown on the base map, the Councils note that the load traverses an embankment and that the stability of this under the proposed loading has not yet been considered. The Councils also note that the construction access for large loads and cranes to the substation in plot E33 is via access K which is only a temporary access. It is unclear if it is the applicants intend to reopen access K if any future AIL or crane movements are required in the operational phase.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		vii) confirm or otherwise that your chosen route is viable; and viii) advise of your access proposals should this route no longer be viable.	118], which avoids using the weight restricted bridge that is the subject of this question, related to the site access on Beck Roadis viable. It should be noted that, the information previously provided in Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118]has been superseded with the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].	
Q1.10.13	The Applicant			
Q1.10.14	The Applicant			
Q1.10.15	The Applicant			
Q1.10.16	The Applicant			
Q1.10.17	The Applicant	**Abnormal loads - access to Sunnica East Site A** Paragraphs 2.2, 2.3 and 2.4 of Annex D2 to ES Appendix 13C [APP-118] deal with the Beck Road/Ferry Lane egress and entry manoeuvres. However, paragraph 2.6 deals only with the right turn egress manoeuvre from B1102 Mildenhall Road onto The Street. Please advise whether the left turn from The Street onto	We can confirm that the left turn from The Street onto B1102 Mildenhall Road canbe made safely within highway land and without affecting the tree in the central reservation. Figure 27 in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-302] provides the swept path for the 1000T crane at theB1102 The Street / Mildenhall Road Junction. Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis of the AIL route reviewsas shown in the updated Framework Construction Traffic	Plate 6 in Appendix P of the change submission [AS-276] appears to contradict this statement. The blue line (wheel track as described 2.1.5) goes over part of the island.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		B1102 Mildenhall Road can be made safely within highway land and without affecting the tree in the central island.	Management Plan and Travel Plan [AS-300, AS-301].	 Plate 6: Bend on B1102 The Street / Mildenhall Road
Q1.10.18	The Applicant	**Abnormal loads - access to Sunnica East Site A** Paragraphs 2.2, 2.3 and 2.4 of Annex D2 to ES Appendix 13C [APP-118] deal with the Beck Road/Ferry Lane egress and entry manoeuvres. However, paragraph 2.7 deals only with the egress manoeuvre from B1102 Fordham Road onto B1104. Please advise whether i) the turn from B1104 onto Fordham Road can be made	We can confirm the turn from B1104 onto Fordham Road can be made safelywithin highway land. We can confirm the full width of both sides of the carriageway would be required. When performing this manoeuvre the vehiclewould be under escort to/from the site which is the normal practice. Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis of the AIL route reviewsas shown in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].	Current plans do not show the Highway boundary and as such it is not possible to confirm manoeuvres can be within the highway.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		safely within highway land and ii) the full width of both roads would be required.		
Q1.10.19	The Applicant	**Abnormal loads - access to Sunnica East Site A** Paragraph 2.8 of Annex D2 to ES Appendix 13C [APP-118] is headed "B1104 to B1085 High Street" and states that "*The 1000T crane can manoeuvre the right turn from B1104 onto B1085 High Street*". Please i) confirm that the manoeuvre from B1104 onto B1085 is a left turn and is the egress manoeuvre as shown on Figure 35; and ii) advise whether or not the entry manoeuvre from B1085 onto B1104 can be made safely within highway land and whether any road traffic signs would require temporary removal.	We can confirm the manoeuvre from B1104 onto B1085 is a left turn at the T-Junction as shown in Figure 35 in Annex D2 to ES Appendix 13C [APP-118]. We can confirm the entry manoeuvre from B1085 onto B1104 can be made safely within highway land and no road traffic signs would be required to be temporarily removed. Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis of the AIL route reviewsas shown in the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].	Current plans do not show the Highway boundary and as such it is not possible to confirm manoeuvres can be within the highway.
Q1.10.20	The Applicant	**Abnormal loads - access to Sunnica East Site A** Paragraph 2.9 of Annex D2 to ES Appendix 13C [APP-118]	It is confirmed Figures 39 and 40 should refer to the 'East S-Bend'. This will be addressed in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan that the	Current plans do not show the Highway boundary and as such it is not possible to confirm

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		is headed "Chippenham" and includes Figures 37 to 42. Should Figures 39 and 40 refer to the East S-bend? Please confirm that the entry manoeuvres can also be made safely within highway land without removal of street furniture or road traffic signs.	Applicant proposes to submit at a future Deadline which will take into account the Applicants response to the LocalImpact Report [REP1-024]. We can confirm the entry manoeuvre in question can be made safely withinhighway land without removal of street furniture or road traffic signals. Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis of the AIL route reviewsas shown in the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. The swept path analysis within Chippenham at the two 'S' bends are provided for the 46.63m AIL and 1000T crane within Figure 24 to Figure 26 of the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].	manoeuvres can be within the highway.
Q1.10.21	The Applicant	**Abnormal loads - access to Sunnica East Site A** Paragraph 2.10 of Annex D2 to ES Appendix 13C [APP-118] is headed "Dane Hill Roundabout" and includes Figures 43 and 44. Please confirm that the entry manoeuvre from the A11 off slip left onto the B1085 can also be made safely within	No constraints were identified for the manoeuvre from the A11 off-slip onto the B1085. Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis of the AIL route reviewsas shown in Figure 23 of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].	Current plans do not show the Highway boundary and as such it is not possible to confirm manoeuvres can be within the highway.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		highway land without removal of street furniture or road traffic signs.		
Q1.10.22	The Applicant	**Abnormal loads - access to Sunnica East Site B** Paragraph 5.9.4 of ES Appendix 13C [APP-118] and pages 23, 24 and 25 of Annex D to ES Appendix 13C [APP-118] describe the proposed crane access route to Sunnica East Site B, with entry from the A11 northbound off slip to Elms Road and egress via the Red Lodge dumb-bell roundabout junction. iii) If the crane is to access the site from the north via the A11 southbound, how will this be achieved? iv) Will this route also be used for access by transformers? and v) In the title to Figure 36 on page 13C-40, should "*Beck Road*" read "Elms Road"?	The purpose of the route reviews were to identify that a route from the Strategic Road Network to the required site accesses was possible for the cranes and AILs. The route review demonstrates there is a feasible route for the AILs between the A11 and the required site accesses. An experienced haulier who specialises in AILs would be responsible for the final route and coordination with the relevant authorities e.g., the police and the local highway authorities. If the haulier chose to utilise an alternate route of the crane accessing the site from thenorth it would be expected that this would be via the A11 southbound off-slip and via the Red Lodge Dumbbell Roundabouts and via Elms Road. The haulier of theAIL will undertake the final route review. The route review included within the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301], as shown on drawing number 60589004_ES_CTMP_016 in Figure 23 (Page 13-C-40) identifies that the46.63m AIL used to transport the transformer could use the same route. Annex D of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis	See response to Q1.10.6 noting the applicant has not demonstrated that there is a feasible route from a port via the SRN or appear to have engaged a specialist haulier for advice.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			of the AIL route reviewsas shown in the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. We can confirm that Figure 36 on page 13C-40, should read "Elms Road". Thiswill be addressed in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan that the Applicant proposes to submit at a future Deadline which will also take into account the Applicants response to theLocal Impact Report [REP1-024].	
Q1.10.23	The Applicant	**Access to Sunnica East Site B** Paragraph 5.9.5 of ES Appendix 13C [APP-118] says that "*Figure 37 presents a selection of swept path analysis of a large car for entry and egress into Sunnica East Site Access C on Elms Road (Site Access C)*". Please explain how you know that the selection includes the worst case.	The word 'selection' was intended to mean that a variety of combinations of movements were shown to demonstrate that construction staff vehicles can pass one another upon entering and egressing the Sunnica East Site B: Site Access Con Elms Road at the same time. It was not intended to suggest that only the worst-case movements were presented. The movements show two vehicles passing each other along Elms Road to the south and two vehicles passing each other to the north. This demonstrates construction staff can pass one anotherentering and egressing the site access.	It is understood that all vehicles <7.5 tonnes (ie not HGVs) will be required to use the car park off Elms Road as they have not been assessed for other accesses. Therefore, the swept path analysis should assess the vehicle with the greatest manoeuvring footprint (ie not necessarily the largest vehicle).
Q1.10.24	The Applicant	**Access to Sunnica East Site B** With reference to Annex C1 to ES Appendix 13C [APP-118]: Table 8 on page 29 is headed "Sunnica East - Access I" but related Figure	The designations on Figure 3-13 [APP-035, APP-135] are correct for SunnicaEast Site B: Site Accesses I and J. Table 8 in Annex C1 to ES Appendix 13C [APP-118] relates to the access shownon figures 20 to 22. Figure 23 is in reference to another site access on Golf LinksRoad which was considered, but not taken	Accesses I and J are discussed in Annex E of the LIR [REP1-024] at paragraphs E.68 to E.77. The Councils would wish to highlight the comments made in E.74 regarding visibility and road safety.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		21 is headed "Sunnica East Access J". Figure 22 (Access I) states that Access I is "*only to be used in the operational phase*". Figure 3-13 shows access I coloured grey (secondary access: construction and decommissioning) and adjacent to the A11, and access J coloured green (secondary access: operation only) on Golf Links Road. vi) Are these the accesses I and J as shown on Figure 3-13? vii) Are the designations on Figure 3-13 correct? viii) Should reference also be made in Table 8 to Figures 21, 22 and 24? ix) Do Figures 23 and 24 refer to access I or access J?	forwards following statutory pre- application consultation, Figure 3 within the Framework Construction Traffic Management Plan and TravelPlan [AS-300, AS-301] identifies the Sunnica East site access locations. Site Access I is located on Newmarket Road between Golf Links Road and the A11, which is intended to be used during the construction period only. Site Access J islocated on Golf Links Road and is an existing gated access to the land, which is intended to be used infrequently during the operational phase. The Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] will be updated in the next iteration that the Applicant proposes to submitat a future Deadline which will provide further clarification regarding the site accesses taken forward. Sunnica East Site B: Site Access J on Golf Links Road is proposed to be used during the operational phase only as it is an existing gated access to the land. The original proposals were to use Sunnica East Site A: Site Access J on Golf Links Road during the construction phase. However, as part of the consultation process and feedback from the public, a review of this site access on Golf Links road was undertaken. The conclusion identified that Golf Links Road would not beused during the construction phase. Therefore, Sunnica East Site A: Site Access Ion Newmarket Road adjacent to the A11 was identified to be used during the construction and	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			decommissioning phases. Table B-9 contained in Appendix B Design Principles to the Design and Access Statement [AS-250] together with requirement 6 in Schedule 2 to the draft DCO, secures the phases (construction, operation and decommissioning) in which each of the site accesses are to be used.	
Q1.10.25	The Applicant			
Q1.10.26	The Applicant			
Q1.10.27	The Applicant			
Q1.10.28	The Applicant			
Q1.10.29	The Applicant			
Q1.10.30	The Applicant			
Q1.10.31	The Applicant			
Q1.10.32	The Applicant			
Q1.10.33	The Applicant			
Q1.10.34	The Applicant			
Q1.10.35	The Applicant			
Q1.10.36	The Applicant			
Q1.10.37	The Applicant			
Q1.10.38	The Applicant			
Q1.10.39	The Applicant	**HGV access** With reference to paragraph 4.1.6 of ES Appendix 13C [APP-118] please explain	If temporary or unforeseen road closures or diversions were put in place by therelevant traffic authority, then the HGVs' route would be required to follow the signed diversions. These would be temporary and short-term	This demonstrates the need for consent to be obtained from the relevant LHA for road closures and their associated diversion routes for the temporary regulation

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		i) in what circumstances you would seek to make changes to the HGV routes used for the proposed development; and ii) how you would demonstrate that the changes were within the Rochdale envelope.	changes to the HGV routes, using diversions introduced by the relevant traffic authority and would be out of the control of the Applicant. In the case of using signed diversions, it is reasonable to assume that the use of the signed diversion route by HGVs is acceptable and would not have significant additional environmental effects on the basis of the route being introduced by the relevant traffic authority. The Applicant has identified an appropriate HGV routeing and has no desire to change it at this stage but it is reasonable to provide a degree of properly supervised flexibility to allow changes to the HGV routeing if the circumstancesmerit them. If the Applicant sought to change the HGV routes from those set out in the Framework Construction Traffic Management Plan and Travel Plan it would need to supply the relevant county authority the evidence it reasonably requires to be satisfied that the proposed altered routeing would not lead to any materially new or materially different significant environmental effects than those assessed in theEnvironmental Statement when seeking its approval under requirement 16 of the draft DCO. The nature of the evidence required would depend on the nature of the change proposed.	measures in schedule 14. This will enable the LHA to co-ordinate closures with others and approve diversion routes to minimise the impacts of HGV traffic associated with the project and other highway users. In terms of the applicant's HGVs the same degree of control should apply in terms of routing and timing for diverted traffic as would if the vehicle was using a route approved in the OCTMP&TP.
Q1.10.40	The Applicant	**Site access and crane routes** With reference to paragraph 5.1.4 of ES Appendix 13C [APP-118] please explain	The Framework Construction Traffic Plan and Travel Plan [APP-300, APP-301] isa framework document. The detailed CTMP and TP will be produced by the contractor prior to the start of construction and submitted to the relevant county authority for	It is the Councils' understanding that the Applicant will be responsible for compliance with any management plan and on this basis, overall responsibility should

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		i) in what circumstances you would seek to make changes to the information provided; and ii) how you would demonstrate that the changes were within the Rochdale envelope.	approval under requirement 16 of the draft DCO. At that time, when more precise information will be known of the detailed design of the scheme and its construction. It is anticipated that the final documents will primarily provide additional detail to the information contained within the framework documents. Changes required in the final CTMP and TP would be as a result of identifying improvements which could be made, or responding to conditions which could notbe foreseen at the framework stage, including those outside of the Applicant's control. With regards to the Rochdale envelope, the ES and accompanying documents have been based as far as possible on a worst-case scenario, and has been sufficient to enable the main, likely significant effects to be identified and assessed. The level of flexibility within the F-CTMP and ES is not unreasonable for a DCO project at this stage, and changes included within the final documents would need to be approved by the relevant county authorities in accordance withrequirement 16 contained in Schedule 2 to the draft DCO.	not be delegated to contractors. The applicant must be responsible for co-ordinating implementation of the management plans, monitoring, reporting and enforcement if one or more transport co-ordinators are appointed (e.g. in the case of multiple contractors being employed to deliver the project). Not to do so is likely to result in fragmentary supervision of the management plans which are an intrinsic part of the mitigation proposed by the applicant.
Q1.10.41	The Applicant	**Site access and crane routes** With reference to paragraph 5.2.2 of ES Appendix 13C [APP-118] i) Does a 16.5m articulated vehicle always have the least	The 16.5m articulated vehicle represents the worst-case scenario in terms of swept paths of the HGVs that would regularly use the site accesses (noting thatwhile certain site accesses would be used by AILs, these movements would be infrequent and appropriately supervised). Annex D of the Framework Construction	i) No comment ii) The inability to pass two large vehicles in the accesses is matter raised in our LIR [REP1-024] (for example at Annex E paragraph E.53) iii) No comment

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		favourable (ie worst case) swept path? ii) What happens when two articulated vehicles attempt to pass each other? iii) What type of vehicle will be used to transport large items of plant, eg transformers, and how will such vehicles be accommodated?	Traffic Management Plan and Travel Plan [APP-118] has been superseded with the information provided within the main body of the report showing the swept path analysis of the AIL route reviewsas shown in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. The majority of the HGV movements are forecast on the Strategic Road Network which provides adequate width for two HGVs to pass each other. The primary site accesses for HGVs are located on Elms Road for Sunnica East and La Hogue Road for Sunnica West. These are located in close proximity to the A11. As part of Chapter 12 of the Transportation Technical Note [APP/8.42] submittedat Deadline 2, further swept paths analysis has been undertaken to demonstrate where highway works is required to provide passing places to accommodate two-way HGV movements along Elms Road and La Hogue Road. This demonstrates that the proposed works are sufficient to enable two HGVs to safely pass each other. A 46.63m AIL is identified to transport the transformer to site. The swept path analysis of the 46.63m AIL is provided within the Framework Construction Traffic Management Plan and Travel Plan [Applicant's Change Request AS-300, AS-301]. The 46.63m AIL is considered to be the worst-case scenario in terms of the largest vehicle requiring access to the site. Therefore, the swept path analysis shown	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			indicates the worst-case scenario in terms of the measures required to facilitate its passage.	
Q1.10.42	The Applicant	**Site access and crane routes** Paragraph 5.2.3 of ES Appendix 13C [APP-118] refers to the east and west site accesses and paragraph 5.3.4 of ES Appendix 13C [APP-118] refers to the grid connection route site accesses. Please confirm that in all cases you are seeking the necessary rights to enable you to deal with unplanned maintenance and replacement activities during the operational phase of the Proposed Development.	The operational site accesses are identified Figure 2 to Figure 7 within theFramework Construction Traffic Management Plan and TP [APP-118]. Maintenance and replacement activities during the operational phase will be made through those identified site accesses only. The operational site accesses make use of existing site accesses and unplanned maintenance and replacementactivities are not considered to intensify the use of the existing site accesses and are considered de-minus in impact on the local highway network. While the Applicant remains committed to seeking the rights and interests in land it requires for the delivery of the project through negotiation, the Applicant is seeking the authorisation of the compulsory acquisition of the land and rights required to secure the use of such accesses through the operational lifetime of the proposed development. In the case of the accesses, where not otherwise sited on land over which the Applicant seeks the power to compulsorily acquire the land (shown in pink on the Land and Crown Land Plans [AS-281], it seeks the'access rights' described in Schedule 8 to the draft DCO.	In the absence of information on the likely use of accesses, planned or unplanned, in the operational phase, the Councils cannot agree that there will not be an intensification of use of the accesses. Those accesses that currently exist are used for low intensity agricultural purposes. This is of particular concern in that temporary traffic management measures (required for safety reasons and to reduce the need to provide suitable visibility from the access) that are proposed during the construction period are unlikely to be reinstated except during major maintenance works. Of concern for Sunnica East would be Accesses C and E which form the permanent accesses to the sub stations. Plans for Access J (Golf Links) Road do not show visibility splays and any improvements necessary to deliver this to the north west would have to be within the public highway as the order limits follow the western edge of the track.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				For Sunnica West, Accesses C (Dane Hill) and D (Fordham Road), both have limited visibility splays.
Q1.10.43	The Applicant	**Site access and crane routes** Paragraph 5.2.5 of ES Appendix 13C [APP-118] says that "*In the Manual for Streets, 4.8m is identified as the width of carriageway which can accommodate an HGV passing a car*." This reference appears to be to Figure 7.1 in the Manual. With reference to the Manual for Streets, please explain i) why a document intended for use in urban areas with design speeds often of 20mph is relevant here, particularly as there are generally no footways; and . ii) why 4.8m is a realistic figure, bearing in mind rural road geometry, likely visibility and vehicle speeds.	The purpose of the reference to Manual for Streets (MfS) was to identify the minimum width required for an HGV to pass a car, it would be expected that this passing would occur at low speeds. Whilst MfS applies to urban areas, advice on geometries required for vehicles to pass each other is relevant as it relates to the physical widths of vehicles. The locations in question have typically good forward visibility, and it is not unreasonable to expect that drivers will reduce speeds on sight of an oncoming vehicle, as typically occurs in rural areas across the country. Since the submission of the ES, further consultation was undertaken with the local highway authorities who have requested that local widening is provided to accommodate two passing HGVs, including avoiding wingmirrors overhanging verge. To meet this additional requirement, swept path analysis has been undertaken of the wheel path and vehicle envelope of two 16.5m articulated lorries, noting that this would be a rare occurrence. Section 12 of the Transportation Technical Note [APP/8.42] identify the indicative locations of passing bays to accommodate two way HGV movements along Elms Road andLa Hogue Road.	The Councils have commented on the appropriateness of using MfS to determine appropriate carriageway widths for traffic to pass in the LIR [REP1-024] (at paragraphs 13.74 to 13.79) and do not consider a width of 4.8m (or 5.5m) is adequate for two large vehicles to pass on rural roads, both for safety reasons but also the likely damage to the edge of the carriageway and verge due to over-running. The Councils is considering the appropriateness of proposed passing bays rather than widening previously proposed based on drawings supplied by the applicant.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.10.44	The Applicant	**Site access and crane routes** Paragraph 5.2.5 of ES Appendix 13C [APP-118] says that, in response to Suffolk County Council, you undertook a review into the widths of key local roads where the majority of the HGV trips would be undertaken. Please i) provide details of any local roads, ie any roads other than the A11, A14 and A142, where any HGV and/or AIL trips would occur at any time in the life of the project which have not been assessed; ii) explain why these roads have not been assessed; and iii) detail any further mitigation proposals you consider to be necessary in respect of these roads.	All local roads where HGV trips would occur at any point in the life of the project have been identified and assessed as shown within the Transport Assessment [APP-117]. This includes a thorough assessment within the Transport chapter ofthe ES [APP-045], and a review of the physical capacity of the roads and junctions to accommodate the safe passage of the largest HGVs and AILs which would be required to use the routes. Temporary physical works have been identified where required for Elms Road and La Hogue Road, and these will be secured through the provisions of the DCO. These two drawings for Elms Road and La Hogue Road are provided within the Transportation Technical Note [APP/8.42] submitted at Deadline 2 identify where passing places can be provided to accommodate passing places of two HGVs. This includes consideration of the geometry of the highway and other characteristics such as the verge and vegetation as well as adequate space for wingmirrors of the two HGVs to pass one another. These two drawings are also intended to be provided within the next iteration of the Framework Construction Traffic Management Plan and Travel Plan that the Applicant proposes to submit at a future Deadline. The majority of the HGV movements on local roads are forecast to occur on Elms Road and La Hogue Road as these are where the main site accesses are located for Sunnica East and Sunnica West respectively. These	The Councils have summarised their understanding of the HGV movements on the local road network adjacent to Sunnica East in table 10 of the LIR [REP1-024]. It is not clear whether the applicant has yet obtained information on the location of the highway boundary from either SCC or CCC to confirm that the passing bays are deliverable within the order limits or public highway. Clarity is required whether the passing places are permanent or temporary (i.e. removed after the construction phase). The Councils note that the route reviews did not include measurement of the road width other than at select locations near some accesses. While the Traffic Sign Manual 5 (table 2-1) states that centre lines should not be used on roads less than 5.5m in width, it should not be assumed that the presence of cetrelines indicates a constant 5.5m width or greater. As noted in response to Q1.10.43 a width of 5.5m may not be suitable for two large HGVs to pass. While Newmarket Road

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			site accesses are located400m (0.25 miles) and 1km (0.6 miles) from the A11 respectively. In addition, HGV routes include Newmarket Road, Freckenham Road, Chippenham Road and Dane Hill Road and the route review undertaken identifiedthese roads to be wide enough to accommodate an HGV passing a car as centre white lines are provided along the carriageway. Conditional surveys of the highway on HGV routes are committed to be undertaken prior, during and after construction to identify, and subsequently makegood, any damage caused. The detailed scope of the conditional surveys will be agreed with the local highway authorities, which is secured through the Framework Construction Traffic Management Plan and Travel Plan and requirement 16 of the draft DCO. In relation to AILs, the Framework Construction Traffic Management Plan and Travel Plan [AS-300, 301] demonstrates that there are viable routes from the strategic road network for the largest AILs that would be required to access the Sunnica Energy Farm and outlines the temporary works that may be required tofacilitate the passage of such vehicles. The locations for these temporary interventions in the highway are shown on the Access and Rights of Way Plans [AS-283] and are described in Part 2 of Schedule 5 of the draft DCO [AS-293]. It is reasonable to assume that the strategic road network is suitable for AILs andthat the	(C610 Worlington and C576 Great Barton) and the B1102 Freckenham Road / Mildenhall Road do have centre lines Elms Road C603 Freckenham Road and C608 Beck Road / Isleham Road do not. While Site Access A (secondary construction access) is around 400m from the end of the A11 slip off Access C the primary construction access off Elms Road is 1150m from the A11 slip off. For comments on the suitability of the SRN for abnormal loads please see responses to Q1.10.5 an Q1.10.6.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			major ports by which components requiring transport by AILs will be similarly well served by appropriate connections to the strategic road network. It would be disproportionate to require detailed swept path analysis of every conceivable route between port and the relevant site accesses. In any event, the final routing will be determined by an experienced haulier in compliance with the regulations that apply to the movement of AILs on the highway, as is summarisedin the Applicant's response to question 1.10.8.	
Q1.10.45	The relevant highway authority			
Q1.10.46	The relevant highway authority			
Q1.10.47	The Applicant	**Site access - Golf Links Road** Paragraph 5.11.1 of ES Appendix 13C [APP-118] deals with site access to Sunnica East site B and says that … "*a site access was identified on Golf Links Road … which avoided the A11/Newmarket Road Junction.*" but does not identify which access by cross reference to Figure 3-	Yes, paragraph 5.11.1 is referring to the Sunnica East Site B: Site Access J on Golf Links Road. This is an existing gated access which provides vehicle access to the land. Site Access J on Golf Links Road was previously identified during thestatutory pre-application consultation to be used during the construction period. However, based on feedback from members of the public, Site Access J is no longer to be used during the construction phase. Site Access I on Newmarket Road located between the A11 and Golf Links Road is now identified to provideaccess during the construction and decommissioning periods.	The Councils have raised concerns about the ambiguity regarding this access and Access I in the LIR [REP1-024] at paragraphs E68 to E72. In terms of use, it is expected that the access will continue to serve the small gas station to the south and also the surrounding agricultural land plus maintenance traffic for this project which suggests at least some increase in use.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		13 which shows Sunnica East A and B site accesses. i) Is this access J as shown on Figure 3-13? ii) If not, which access are you referring to? iii) Why is access needed off Golf Links Road?	The existing site access located on Golf Links Road (Access J) is proposed to be used during the operational phase only. The use of this access will be infrequent and for maintenance requirements. This is considered to be comparable with its existing usage. Table B-9 contained in Appendix B Design Principles to the Design and Access Statement [AS-250] together with requirement 6 in Schedule 2 to the draft DCO, secures the phases (construction, operation and decommissioning) in which eachof the site accesses are to be used.	
Q1.10.48	The Applicant			
Q1.10.49	The Applicant			
Q1.10.50	The Applicant	**Proposed traffic management** With reference to paragraph 6.1.2 of ES Appendix 13C [APP-118], and to your inference that the final proposals may change from those outlined here, please confirm that the measures outlined in your Framework Construction Traffic Management Plan and Travel Plan will be updated in accordance with Requirement 16 in Schedule 2 to the dDCO [AS-293].	The contractor will be responsible for the production of the final Construction Traffic Management Plan and Travel Plan. Any changes that are proposed will be updated for the approval of the relevant county authorities in accordance with Requirement 16 in Schedule 2 to the dDCO.	The ultimate responsibility for compliance with any management plan secured as part of the DCO lies with the applicant. They shall also be responsible for co-ordination of such plans, monitoring and reporting of data together with enforcement. Experience from cable corridors for offshore wind turbine projects has shown that different contractors deliver parts of the project (e.g. cable corridor and sub stations) and if responsibility is delegated to the contractors it can, without oversight, result in

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
				fragmentation of the management measures. See also Q1.10.40
Q1.10.51	The Applicant	**Proposed traffic management** With reference to paragraph 6.1.5 of ES Appendix 13C [APP-118], please explain i) why vehicle speeds are unlikely to be affected by the recent public health restrictions; and ii) why the surveys were necessary, given that it is normal practice to introduce a speed limit, usually 30mph, at site accesses if one is not already in place?	As discussed with the local highway authorities in a meeting on 25/03/2021, the local highway authorities stated that volumetric traffic counts were not consideredappropriate at the time, however speed surveys would be accepted. The local highway authority also advised that speed surveys were being accepted as valid data, as they are robust with speeds during Covid restrictions typically being unaffected, but any effect on speeds would be an increase rather than decrease, as a result of reduced traffic. Therefore, higher speeds would require larger visibility splays for the site access junctions (and associated loss of vegetation with potential environmental effects) if no other mitigation was being provided i.e.the temporary speed limit reductions, temporary traffic signals and warning signage (all of which are being provided - see below). The speed surveys were carried out as requested by the local highway authoritiesto inform the proposed temporary speed limit reductions and temporary traffic signals through an understanding of current vehicle speeds. The temporary speed limits reductions are part of the package of measures to provide safe entry and egress of vehicles to/from the construction site accesses. These are alongside temporary traffic signals and the signage to be	The Councils note that while temporary speed limits are frequently used for safety reasons at road works, such use must be tempered with the realisation that without enforcement or other controls compliance with such limits can be poor. Care should be taken not to rely on temporary speed limits as the sole safety measure nor to set acceptable visibility standards based on such restrictions.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			provided warning motorists of upcoming site accesses and temporary traffic signals. These measures are detailed in the Framework Construction Traffic ManagementPlan [AS-300, AS-301] and shown on the Traffic Regulation Measures — Temporary Measures Plans [AS-287 - AS-288], to be implemented by the provisions of the draft DCO.	
Q1.10.52	The Applicant	**Proposed traffic management measures** With reference to paragraph 6.4.1 of ES Appendix 13C [APP-118], i) Please clarify the sites, access points and options to which each of the proposals applies; and ii) please signpost the reader to a plan showing the location and extent of the temporary traffic signal and temporary speed limit proposals.	The summary of the temporary traffic signals and temporary speed limits are outlined in the bullet points in paragraph 6.4.1 of ES Appendix 13C [AS-278, AS--279]. The temporary traffic signals and temporary speed limit reductions are shown onthe Traffic Regulation Measures Plan Temporary Measures in document reference [AS-287 – AS-288]. These plans also indicate the location of the site accesses. The locations of the temporary speed limits and traffic signals are described in Parts 1 and 4 respectively of Schedule 14 to the draft DCO. Below provides a summary of the temporary traffic signals and temporary speed limit reductions and the site accesses they relate too: Proposed temporary traffic signals at the site access on Weirs Drove – is no longer required as outlined on sheet number 60589004-TRM-TM-001 within the Traffic Regulation Measures Plans – Temporary Measures [AS-AS-287, AS-288]; Proposed speed limit reduction to 40mph along a short section of the B11102 Ness Road with temporary traffic signals at the	Details of the temporary traffic management supplied to date do not show if there is adequate carriageway width at and approaching the signal heads to allow for two lanes of traffic to pass, including within the site access roads. As noted above (Q1.10.51) care should be taken when relying on temporary speed limits for visibility requirements. It is unclear if the delays to road users due to the temporary traffic measures has been considered in terms of driver delay. The extent that such measures will need to be reinstated when accesses are used during the operational phase is a matter of discussion between the applicant and the relevant LHA. The Councils' preference is that at least the permanent accesses should be designed to operate

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Grid ConnectionRoute Site Access I outlined on sheet number 60589004-TRM-TM-002 and sheet number 60589004-TRM-TM-003 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed speed limit reduction to 40mph along a short section of Newmarket Road (north of the A142 roundabout) with temporary traffic signals at the Grid Connection Route Site Access K and the grid connection crossing the highway outlined on sheet number 60589004- TRM-TM-004 and sheet number 60589004-TRM-TM-005 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed temporary traffic signals along a short section of Newmarket Road (north of the A142 roundabout) outlined at Grid Connection RouteSite Access K and the grid connection crossing the highway on sheet number 60589004-TRM-TM-004 and sheet number 60589004-TRM-TM-005 within the Traffic Regulation Measures Plans – Temporary Measures [AS-287, AS-288]; Proposed speed limit reduction to 30mph along a short section of Snailwell Road at Sunnica West Site B Site Access D with temporary traffic signals at the site access outlined on sheet number 60589004- TRM-TM-006 within the Traffic Regulation Measures Plans — TemporaryMeasures [AS-287, AS-288];	without the need for temporary traffic restrictions. Where use is made of existing accesses these should be improved as considered necessary based on the existing site and likely intensification of use in the operational phase. Additional comments regarding traffic management were made in Annex F of the LIR [REP1-024] at paragraphs F23 to F27

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Proposed speed limit reduction to 30mph along a short section of Fordham Road at Sunnica West Site B Site Access D with temporary traffic signals at the site access outlined on sheet number 60589004- TRM-TM-006 within the Traffic Regulation Measures Plans — TemporaryMeasures [AS-287, AS-288]; Proposed speed limit reduction to 40mph along a short section of Chippenham Road with temporary traffic signals at the Sunnica West SiteA Site Access B and Grid Connection Site Access M and N outlined on sheet number 60589004-TRM-TM-007 and sheet number 60589004- TRM-TM-008 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed speed limit reduction to 40mph along a short section of La Hogue Road at Grid Connection Site Access O with temporary traffic signals at the site access outlined on sheet number 60589004-TRM-TM- 009 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed speed limit reduction to 40mph along a short section of the B1085 at Grid Connection Site Access P and Q with temporary traffic signals at the site access outlined on sheet number 60589004-TRM-TM- 010 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed speed limit reduction to 40mph along a short section of Dane Hill Road at	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Sunnica West Site A Site Access C with temporary traffic signals at the site access outlined on sheet number 60589004-TRM-TM- 011 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed speed limit reduction to 30mph along a short section of ElmsRoad at Sunnica East Site B Site Access A, B and C with temporary traffic signals outlined on sheet number 60589004-TRM-TM-012 and sheet number 60589004-TRM-TM-013 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288]; Proposed temporary traffic signals along a short section of the B1102 Freckenham Road at the Grid Connection Site Access R and S outlinedon sheet number 60589004-TRM-TM-014 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288] and Proposed speed limit reduction to 40mph along a short section of Newmarket Road (Worlington) with temporary traffic signals at the Sunnica East Site B Site Access D and H outlined on sheet number 60589004-TRM-TM-015 and sheet number 60589004-TRM-TM-016 within the Traffic Regulation Measures Plans — Temporary Measures [AS-287, AS-288].	
Q1.10.53	The Applicant	**Proposed traffic management measures** With reference to paragraph 6.4.1 of ES Appendix 13C	The Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been updated alongside the Applicant's Proposed Changes to the Application [AS-243], which was accepted	The Applicant has provided revised plans for these accesses and the Councils are considering this before responding. In the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		[APP-118], are there any proposals in respect of iii) Grid Connection Route A site access point T on Isleham Road (Figure 3-25); and iv) East A access points E, F, G and K on Beck Road and Ferry Lane? (Figure 3-13) If not, please explain why not.	by the Examining Authority in its procedural decision contained in Appendix B to its letter dated 4 October 2022. The updated Framework Construction Traffic Management Plan and Travel Plan have been given Examination Library references AS-300 and AS-301. These documents include the swept path analysis along the crane and Abnormal Indivisible Load (AIL) routes provided within the main body of the report. This information therefore supersedes Annex D of the Framework Construction TrafficManagement Plan and Travel Plan [APP-118]. The swept path analysis indicated that the HGVs could enter and egress the existing site access that are provided to the land without any traffic managementrequired for the following site accesses and therefore no traffic management is proposed as the existing site access can accommodate the inbound and outbound movement of the HGV and existing visibility at the site access: Grid Connection route A: Site Access T on Isleham Road Sunnica East Site Access A: Site Access E on Ferry Lane (with theexception of minor vegetation trimming) Sunnica East Site Access A: Site Access F on Beck Lane No HGVs are forecast to be required to access to Sunnica East Site A: Site Access G on Beck Lane, which is an existing access to the land and a residentialproperty. Therefore no traffic management is	meantime, the Councils note that due to the narrow width of Beck Road and Freckenham Road, large vehicles will occupy the full width of these single track roads.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			proposed. Sunnica East Site A: Site Access K on Beck Lane is required to provide access for AILs, which will be escorted to/from the site which is set out in the FrameworkConstruction Traffic Management Plan. Reference is made within the FrameworkConstruction Traffic Management Plan and Travel Plan [AS-300 AS-301] in paragraph 7.2.18 to the Police being given advanced notification under the RoadVehicle Authorisation of Special Types Order 2003 regarding the movement of cranes and AILs. Figure 29 of the Framework Construction Traffic Management Plan and TravelPlan shows the Beck Road / Ferry Lane junction.	
Q1.10.54	The Applicant			
Q1.10.55	The Applicant			
Q1.10.56	The Applicant	**Proposed traffic controls** In paragraph 7.2.3b of ES Appendix 13C [APP-118], do you mean compliance with the limits on number of deliveries arriving at and departing from any particular location at any one time and over the course of the day?	This is set out in the updated Framework Construction Traffic Management Planand Travel Plan [AS-300, AS-301]. It will be the contractor's responsibility to ensure implementation of all aspects of the CTMP. The statement is in relation to the ability for the contractor to schedule deliveriesto manage the number of HGVs arriving and departing the site accesses at any one time, over the course of the day to minimise HGVs related with the scheme passing one another on the local roads or at the site accesses themselves. Compliance in this instance relates to compliance with delivery scheduling as set out in the Delivery Management System	The Councils would like clarity on the final statement that *"no specific limits to the total number of movements for the construction phase are proposed".* This is assumed to refer to the total project and not to the daily HGV movements. Note also comments in our response to Q1.10.40 regarding the responsibility of the applicant to ensure that all management plan measures are complied with and this cannot entirely be

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			(DMS). The "limits" in question will be set through the DMS as an operational management tool, to manage the different activities on site on a day-to-day basis. No specific limits on the total number of HGV movements for the construction phase are proposed to be established through the DCO.	delegated to one or more contractors.
Q1.10.57	The Applicant	**Proposed traffic controls** In paragraph 7.2.5 of ES Appendix 13C [APP-118], in respect of HGV routes, you say that "*Local HGV deliveries ….would be required where possible to follow Sunnica HGV routes*". In what circumstances would it not be possible to follow Sunnica HGV routes, and why?	This relates to HGV movements where both the origin and destination are within the Sunnica sites, e.g. along the B1085 to/from the A11 for the Grid Connection Route Site Access P and Site Access Q as well as Grid Connection Route Site Access 'T' on Isleham. The Sunnica HGV routes are established to link the site access with the Strategic Road Network. There may be a small number of instances where HGVs are needed to use sections of public highway between two access points, which are not part of the HGV routes between the site and theStrategic Road Network. This will apply to very few vehicles and the impact will not be significant. All public highway HGV restrictions, such as weight limits, will be observed.	The Councils would be concerned that without control such proposals can set a precedence for other HGV movements. It would be reasonable to include a control that any diversions from agreed HGV routes shall be recorded as exceptions and including in reports to the relevant LHA if prior written agreement is not obtained from the LHA(s).
Q1.10.58	The Applicant			
Q1.10.59	The Applicant			
Q1.10.60	The Applicant			
Q1.10.61	The Applicant			
Q1.10.62	The Applicant	**Staff vehicles**	If construction staff live within the immediate vicinity of either of the two main staffcar parks on Elms Road or La Hogue Road it	While staff may be directed to use the SRN, as set out at [AS-300], it is the Councils' understanding that

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		With reference to paragraph 7.2.21 of ES Appendix 13C [APP-118], i) what do you mean by "*where appropriate*"? ii) Please confirm that staff will be directed to use the SRN and PRN to access the site (the A142 is not part of the SRN) in the same way as construction vehicles, and that this will be a condition of use of the car park permit referred to in paragraph 7.2.29 of ES Appendix 13C [APP-118].	might not be appropriate to direct construction staff to join the Strategic Road Network. E.g., from Red Lodge to Sunnica East staff car park would not use the A11, A14 or A142. The Applicant can confirm that this is correct, construction staff, prior to the start of construction, will be directed to use the Strategic Road Network (SRN) (A14 and A11) and the Primary Route Network (PRN) (A142) to access the two staff car parks on Elms Road and La Hogue Road. This will be part of the car parking permit system. Construction staff will be assigned a parking permit for either the Sunnica West or Sunnica East staff car park. This is outlined in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-278, AS-279].	this will not be controlled or enforced, and so they may route through local communities on 'less desirable' roads.
Q1.10.63	The Applicant	**Staff vehicles** With reference to paragraph 7.4.5 of ES Appendix 13C [APP-118] i) Are the development peak hours the times when all staff will arrive and leave? ii) do you intend that staff will be enabled to arrive and leave at different times in these hours so as to spread arrival and departure times evenly and minimise the impact on the local highway network; and	The Applicant can confirm that this is correct. The construction working hours are 07:00-19:00. Therefore, construction staff will travel on the highway network before 07:00 which is before the network AM peak hour (08:00-09:00) and depart after 19:00, after the PM network peak hour (17:00-18:00). Therefore, the Sunnica Energy Farm would be using the spare highway capacity outside of the network peak hours and inherently minimising the impact on the local highway network by avoiding staff travelling to or from the site within the network peak hours. The working hours are secured under the draft DCO (with reference to the requirement relating to the Construction	As set out within our Local Impact Report [REP1-024], the Councils remain concerned about how the shift patterns are monitored, controlled, enforced and reported within the DCO. It would be beneficial if this could be addressed through a detailed explanation. The Councils disagree with the conclusion that there is spare highway capacity in the event that there were high numbers of vehicles entering and existing the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		iii) if so, how will this be achieved?	Environmental Management Plan [AS-302]). There are no proposals to stagger arrival and departure times of staff. Thisis because it is not considered necessary as there is spare highway capacity at the relevant times. It will also happen naturally to a degree as staff will take varying amounts of time to travel to and from different parts of the Order limits totheir cars.	site during a short time period creating a significant spike in traffic on one arm, as this has not been tested within the junction assessment and is believed to be likely given the long shift patterns. In reality workers will arrive as close to and leave as soon after their shift and not be evenly distributed in the hour between 0600-0700 and 1900-2000.
Q1.10.64	The Applicant			
Q1.10.65	The Applicant	**Compliance and enforcement** With reference to paragraph 8.2.2c.iii of ES Appendix 13C [APP-118] i) Do you intend for the Construction Traffic Management Plan and Travel Plan (CTMP and TP) to be a single document or separate documents? and ii) please confirm that updates to the CTMP and TP will always be considered to resolve the risk of repeated breaches.	The intention is for the final Construction Traffic Management Plan and TravelPlan to be two separate documents. However, if the contractor considers it appropriate, the two documents could remain as one single document, as functionally it is likely to make little difference in their application. The Applicant can confirm that this is correct, updates to the Construction Traffic Management Plan and Travel Plan will be considered to resolve the risk of repeated breaches. This will be addressed in the next iteration of the FrameworkConstruction Traffic Management Plan and Travel Plan that the Applicant proposes to submit at a future Deadline which will take into account the Applicants response to the Local Impact Report [REP1-024].	The Councils would support the document being split into two documents. The Councils welcome changes to address concerns around repeated breaches.
Q1.10.66	The Applicant	**Compliance and enforcement**	Further details of sanctions will be provided in the final Construction Traffic Management Plan and Travel Plan. Enforcement procedures are summarised in paragraph	The Councils await submission of the updated Construction Traffic

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		With reference to paragraph 8.2.6 of ES Appendix 13C [APP-118] i) What sanctions are you considering? And ii) How will they be enforced?	8.2.5 of ES Appendix 13C [APP-118], and also set out in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. Further details will be provided in the final CTMP and Travel Plan. The purpose of the Framework CTMP and TP is to provide a framework for the Construction Traffic Management Plan and Travel Plan. An experienced contractor will prepare the final CTMP, on behalf of the Applicant, and will be required to consider and include relevant sanctions and the method by which theywill be enforced. Requirement 16 contained in Schedule 2 to the draft DCO requires the relevant county authority's approval of the CTMP before the commencement of the development. Relevant sanctions may include e.g. financial penalties. Compliance with the approved CTMP, and hence any corresponding sanctions or enforcement, willform part of the contractual basis by which companies and personnel are procured to work on the project.	Management Plan and Travel Plan.
Q1.10.67	The Applicant	**Baseline conditions** With reference to paragraph 1.2.1 of the Transport Assessment [APP-117], i) Have traffic flows returned to their normal level? ii) How do you know?	A comparison has been undertaken of the 2022 and 2019 traffic data for the A11 and A14 near the Scheme. This is set out in paragraphs 4.21 and 4.22 of the Transportation Technical Note [EN010106/APP/8.42]. These locations have beenchosen as they are the closest parts of the Strategic Road Network to the Scheme, for which there is comprehensive and comparable data available to monitor changes in traffic flow levels over time.	The Councils have reviewed the Transport Technical Note and a brief response is appended to this document.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		iii) If not, do you expect traffic flows to return to their normal level? iv) If not, does this mean that links which have not been assessed will need to be assessed?	Traffic data has been obtained from WebTRIS for locations which have both 2019and 2022 data available to determine if traffic flows have returned to pre-Covid levels. Traffic data for 2022 was only available up to August. The January to August 24-hour Average Daily Traffic (ADT) and 18 Hour Average Weekday Traffic (AWT) has been used for the comparison as this data is available for both years. This comparison indicates that 2022 traffic flows on the A11 and A14 between January and August are between 5% to 12% lower than the January to August 2019 average. It is not possible to know whether or not traffic flows will return to normal levels. Indications at this stage are that traffic flows are not substantially lower than pre- covid levels, although this will vary in different locations. It is notable that the Department for Transport (DfT) has not revised its guidance on forecasting (TAG)to reflect any anticipated medium to long term effects of Covid on traffic flows. Thus the September 2019 traffic flows used in the Transport Assessment [APP-117] and Transport and Access Chapter of the Environmental Statement [APP- 045] are robust. The assessment presented is thorough and on the basis of established traffic growth forecasting methodology. In response to the specific question, there are no links which have not been assessed that would need to be assessed in the event that traffic flows do not fully return to pre-Covid levels. The	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			selection of links to be assessed is predominantly influenced by the level of construction staffor HGVs forecast to use each link. Further details on this review can be found in Section 4 of the Transportation Technical Note [EN010106/APP/8.42].	
Q1.10.68	The Applicant	**Baseline conditions** With reference to paragraph 1.2.2. of the Transport Assessment [APP-117], will the speed survey data collected during the pandemic be an overestimate as the network is less congested?	The temporary speed limits reductions are part of the package of measures to provide safe entry and egress of vehicles to/from the construction site accesses.These are alongside temporary traffic signals and the signage to be provided warning motorists of upcoming site accesses and temporary traffic signals [AS- 287, AS-288]. The speed surveys were carried out as requested by the local highway authoritiesin relation to the proposed temporary speed limit reductions and temporary traffic signals, as discussed with the local highway authorities in a meeting on 25/03/2021. During discussions with the local highway authorities, they stated that speed surveys would be accepted as valid data. The local highway authority also advised that speed surveys were being accepted as they are robust with speeds during Covid restrictions typically being unaffected, but any effect on speeds would be an increase rather than decrease. This is as a result of reduced traffic- speed surveys on quieter roads are likely to record higher speeds than on busier roads, therefore the results of the speed surveys are considered to be robust as they are likely to overstate average speeds expected when/if traffic returns to pre-covid	Generally greater traffic volumes reduce traffic speed. However, other factors such as the nature of the traffic may have an influence, for example if drivers are delayed or late for the beginning of a shift. While SCC does not have factual evidence anecdotally local residents consider that speeds around Leiston are higher during SZB outages. The applicant's last sentence appears to support comments made in our response to Q1.10.52 expressing reservations to rely solely on temporary speed restrictions as a safety measure.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			levels. Measures designed for potentially higher speeds than may occur in practice are typically more robust in terms of safety.	
Q1.10.69	The Applicant	**Baseline conditions** With reference to paragraphs 3.4.4 and 4.5.6 of the Transport Assessment [APP-117] please confirm that i) The A11 and A14 are part of the Strategic Road Network (SRN); ii) The A142 is part of the primary route network (PRN); and iii) All other roads affected by the proposed development are A, B and unclassified roads.	The Applicant can confirm that this is correct. The A11 and A14 are part of the Strategic Road Network (SRN) and the A142 is part of the Primary Route Network (PRN). All other roads affected by the proposed development are A, Band unclassified roads.	A number of roads within the area are C class (i.e. classified) roads e.g. C610 Newmarket Road.
Q1.10.70	The Applicant	**Baseline conditions** With reference to paragraph 3.4.5 of the Transport Assessment [APP-117] and the "*appropriateness of the traffic survey data*" please confirm that you are referring to the suitability, fitness for purpose and robustness of the data.	The term "fit for purpose" means that they are suitable to be used as the baseline for the assessment. This is specifically stated to confirm this point due to the existence of later data sets. The 2019 traffic data obtained from the WebTRIS database for the A11 and A14 are considered fit for purpose due to the impact thecoronavirus pandemic had on traffic flows in 2020 and 2021, meaning that 2019 is the latest suitable source of this data. A comparison has been undertaken of the 2022 and 2019 traffic data for the A11 and A14 near the Scheme with further	The Councils have reviewed the Transport Technical Note and a brief response is appended to this document; however, we would agree with the point that 2019 is a reasonable source, but it is likely we would expect updated survey data for applications from 2023 onwards.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			explanation provided in A1.10.67 regarding the traffic data. No further links would need to be assessed if traffic flows do not fully return to pre-Covid levels, as the selection of links to be assessed is predominantly influenced by the level of construction staff or HGVs forecast to use each link. Further details on this review can be found in Section 4 of the Transportation Technical Note [EN010106/APP/8.42].	
Q1.10.71	The Applicant	**Baseline conditions** With reference to paragraph 3.4.14 of the Transport Assessment [APP-117] you say that "*staff will be sourced from within a 30km radius of the Order limits*". Please explain how you will achieve a construction staff car occupancy rate of 1.5 if staff live over such a wide area. Where is there a map showing the study area?	The 30km travel distance for staff assumption is broadly in line with the latest UK-wide Construction Industry Training Board (CITB) Construction workforce mobilityreporting (2018/19) which finds workers travel a mean distance of 18 miles (circa 29km) to work. The 30km staff travel distance is consistent with the assumptions used for the Socio-economic Assessment in the Chapter 12 of the Environmental Statement [APP-044]. Please see section 3 of the Transportation Technical Note [EN010106/APP/8.42] submitted at Deadline 2 for more information on this and Figure 3-1 illustrating the relevant study area. In terms of the construction staff car occupancy rate, further work has been undertaken to determine whether it is a robust occupancy parameter. This is alsoset out in section 3 of the Transportation Technical Note [EN010106/APP/8.42], to include sensitivity testing. The conclusion is that the rate of 1.5 is robust. As part of the Framework Construction Traffic Management Plan and Travel Plan	The Councils have reviewed the Transport Technical Note and a brief response is appended to this document. As set out in the LIR [REP1-024] we do not agree with the socio economic assessment of the workforce nor the car share ratio being used. In response to paragraph 3.1.4 of [REP2-041], it is worth noting that Sizewell C workstream undertook a sensitivity test for a lower car share proportion to reflect monitoring at Hinkley Point, but more importantly the scale of the workforce and the scope of mitigation and controls associated with that project are significantly different to Sunnica. Whilst the Council recognise that a 1.5 car share has previously been

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			[APP-118] and the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301] measures to encourage lift sharing will be implemented.] This includes a Car Share Scheme which will actively match potential sharers and be available to staff so that they can find their own match aswell as that identified by the Transport coordinator. This is secured under the draft DCO - Requirement 16 contained in Schedule 2 to the draft DCO requires the relevant county authority's approval of the CTMP before the commencement ofthe development, and the CTMP must be substantially in accordance with the Framework CTMP.	accepted for a number of other projects (as indicated at Table 3-1 of [REP2-041], this project has a different mitigation and management context than that offered by those projects in order to achieve a 1.5 car share. In response to paragraph 3.1.9, it is recognised that the proportions are identical to these projects. However, since submission of these projects the Councils have seen monitoring data from Hinkley Point and had discussions with contractors which indicate that these proportions are not always achievable, especially in rural locations. The Council are seeking appropriate monitoring, controls, reporting and enforcement to ensure that the impacts do not exceed the assessed figures.
Q1.10.72	The Applicant			
Q1.10.73	The Applicant	**Baseline conditions and development traffic** With reference to paragraphs 3.4.14 and 5.4.39 of the Transport Assessment [APP-	Middle Super Output Areas (MSOA) are geographical zones that are used to report statistics for small areas in England and Wales. MSOAs are used for census data and represent areas that have a population between 5,000 and 15,000 people or have	The Councils disagree with the use of 2011 Census data to forecast trip distribution for reasons that are analogous to our criticism of the calculations of the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		117], please explain what a MSOA is and its role in establishing the study area.	between 2,000 and 6,000 households. The 2011 Census population data was extracted for MSOAs where all or part of the MSOA is withina 30km radius of the Scheme and has been converted into proportions based on the total population within the 30km radius. This MSOA data was used in the forecast of the trip distribution for construction staff. Further information is provided within Section 3 of the Transportation Technical Note [EN010106/APP/8.42], submitted at Deadline 2.	proportion of home-based workers (set out in the Socio-economics section of the LIR [REP1-024], in particular at 12.18 and 12.19).
Q1.10.74	The relevant highway authority			
Q1.10.75	The Applicant			
Q1.10.76	The Applicant			
Q1.10.77	The Applicant			
Q1.10.78	The relevant local planning and highway authorities			
Q1.10.79	The Applicant	**Baseline conditions** In paragraph 3.4.41 of the Transport Assessment [APP-117] do you mean to say that the traffic flows identified are considered fit for purpose?	The term "fit for purpose" means that they are suitable to be used as the baseline for the assessment. This is specifically stated to confirm this point due to the existence of later data sets. The 2019 traffic data obtained from the WebTRIS database for the A11 and A14 are considered fit for purpose due to the impact thecoronavirus pandemic had on traffic flows in 2020 and 2021, meaning that 2019 is the latest	The Councils have reviewed the Transport Technical Note and a brief response is appended to this document.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			suitable source of this data. Further information is provided in response to Q1.10.67 and chapter 3 of the Transportation Technical Note [EN010106/APP/8.42]. Since the DCO application was submitted, the passage of time has allowed for a comparison of 2022 and 2019 traffic data for the A11 and A14 near the Scheme. These locations have been chosen as they are the closest parts of the Strategic Road Network to The Scheme, for which there is comprehensive and comparabledata available to monitor changes in traffic flow levels over time. Traffic data has been obtained from WebTRIS for locations which have both 2019 and 2022 data available to determine if traffic flows have returned to pre-Covid levels. Traffic data for 2022 was only available up to August. The January to August 24-hour Average Daily Traffic (ADT) and 18 Hour Average Weekday Traffic (AWT) has been used for the comparison as this data is available for both years. This comparison indicates that 2022 traffic flows on the A11 and A14 between Januaryand August are between 5% to 12% lower than the January to August 2019 average. This further demonstrates that the traffic flows used in the assessment are fit for purpose.	
Q1.10.80	The Applicant			
Q1.10.81	The Applicant	**Baseline conditions** You say at the end of paragraph 3.4.43 of the	The weekday assessment considers both the proportional increase in traffic flowsas a percentage impact, as well as a comparison between the development peak	The Councils have reviewed the Transport Technical Note and a

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Transport Assessment [APP-117] that "*A Saturday assessment has not been undertaken as the weekday baseline traffic flows are expected to be higher*." Surely a Saturday assessment should be undertaken as the additional construction traffic will be proportionally higher?	hour, and the network peak hour, in order to draw conclusions on the effect of absolute traffic levels, as well as proportions. This is important in assessing theeffect on driver delay. The proportional impact would be higher on a Saturday because of a lower baseline, however the impact in terms of delay would be greater during the weekday. Therefore, the use of the weekday scenario is considered to be robustfor the purposes of the Transport and Access assessment within Chapter 13 — Transport and Access of the Environmental Statement [AP-045]. The potential requirement for a Saturday assessment was raised by the LHAs through their Relevant Representations, e.g. SCC-113 and CCC-94, and discussed in further meetings. The LHAs concern was whether there was a scenario where construction flows and baseline flows combined were likely to be higher than in the weekday assessment, and not whether there would be a higherproportionate impact. In order to address this, the Applicant has confirmed that Saturday working hourswill be 0700-1900 hours, as per weekdays, and commissioned additional traffic surveys to make a weekday to Saturday comparison. These working hours are provided for in the Framework Construction Environmental Management Plan [APP-123] and the updated version [AS-302]. Requirement 14 in Schedule 2 to the draft DCO requires that	brief response is appended to this document. It is noted that the shift pattern for Saturdays is the same as weekdays and the Councils presume that this will be secured within the management plans.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			no phase of the authorised development can commence until a CEMP has been approved by the relevant authority (or authorities), and the CEMP must be substantially in accordance with the Framework version. Additional traffic surveys were carried out between Thursday 7th to Wednesday 13th July 2022 at the following locations, as also discussed in Q1.10.99. These survey locations were chosen primarily as additional data collection in these locations would provide additional confidence in the conclusions drawn in the ES,and the opportunity was taken to collect comparable weekday and Saturday data: Elms Road; A11/Elms Road T-Junction; La Hogue Road; and Freckenham Road. A comparison of the Saturday traffic flows, and weekday average traffic flows hasbeen undertaken. During the survey period, the Saturday traffic flows were consistently lower thanthe average weekday traffic flows in each and every instance. Further information on this review of Saturday traffic data can be found in Section 4, specifically paragraph 4.1.17, of the Transportation Technical Note [EN010106/APP/8.42].	
Q1.10.82	The Applicant			
Q1.10.83	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.10.84	The Applicant	**Baseline conditions** From the figures quoted in paragraph 3.5.3 and Tables 3-20 and 3-21 of the Transport Assessment [APP-117], the killed and seriously injured (KSI) rate for the surrounding network appears to be around 19%. Do you consider this to be high, low or normal and why? Please explain whether and if so how you expect this value to change with the levels of forecast staff and HGV construction traffic, and why.	It is assumed that the 19% quoted relates to the proportion of all casualties classed as Killed or Seriously Injured (KSI), rather than the total number of collisions or casualties recorded on the network. There is no industry standard as to what proportion of KSIs is considered to be high, low or normal, the key point inreviewing Personal Injury Collision (PIC) data is whether there are clusters of collisions, particularly KSIs, and common causation factors. For the purposes of the Proposed Development a review was undertaken at individual links and junctions to assess whether the number and characteristics of the collisions on record suggest a potential underlying highways safety issue, andhence whether the development related traffic would have a significant impact on highway safety. The Personal Injury Collision (PIC) analysis presented in the Transport Assessment [APP-117] does not indicate a particular safety concern that is likely to be exacerbated by the scheme proposals. This is the Industry Standard method of assessing the potential highways safety impact of development proposals. However, it is not feasible to robustly forecast the potential change in numbers of collisions, or proportions of KSIs, as a result of construction staff and HGV trips. It should be noted for context that during discussions with the Local Highway Authorities, AECOM was requested to review safety risks relating to HGVs	The Councils agree with the applicant that prediction of future trends in road safety is difficult. We have identified areas of concern in the LIR [REP1-024] specifically at paragraphs 13.68 to 13.73, 13.84 and 13.85 and have underlined this in our brief response to the applicant's transport Technical Note, appended to this document.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			performing the 'Boomerang' movement at the A14 J37. This is where vehicles are required to exit the westbound off-slip, turn right onto the A142 and then turn right onto the eastbound on-slip, effectively making a U-turn movement. This movement is required for vehicles travelling southbound on the A11 or westboundon the A14 to access La Hogue Road. A further in-depth review of the PIC data was undertaken and shows that the PIC data does not indicate an underlying safety issue that could result in a requirement on the Sunnica development to provide highways safety mitigation in this location. Further details on the PIC review of the 'Boomerang' movement is provided in Section 9 of the Transportation Technical Note [EN010106/APP/8.42].	
Q1.10.85	The relevant highway authority			
Q1.10.86	The Applicant			
Q1.10.87	The Applicant	**Temporary road closures** In paragraphs 4.3.1 and 4.3.2 of the Transport Assessment [APP-117] you list the roads to be closed temporarily and say that advanced warning will be provided in accordance with highway authority guidance.	The Applicant can confirm that the public and local road users will be informed well in advance of any road closures as part of the Communication Strategy, as provided for in the updated Framework Construction Environmental ManagementPlan submitted at Deadline 2 [EN010106/APP/6.2_Rev02]. This is secured via Requirement 14 of the draft DCO.	The Councils note that as currently described in the Communications Strategy no firm details are provided; only a list of what may be provided. The Councils would welcome more detail that can give comfort that an acceptable level of communication will occur.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Would you also inform the public and local road users well in advance of any closure as part of a stakeholder communications plan, to be part of your Code of Construction Practice or your Construction Traffic Management Plan, to be secured through a Requirement in Schedule 2 to the DCO?		The Councils would not object to the communication strategy for road and PRoW closures to be included in the OCTMP and TP secured via requirement 16 as this is specifically relevant to transport.
Q1.10.88	The Applicant	**Temporary PRoW closures** In paragraph 4.4.2 of the Transport Assessment [APP-117] you list those PRoW to be closed temporarily at some point during construction and say that timing and routeing are currently unknown. When better information is available, particularly in respect of diversion routes, would you inform the public and local PRoW users well in advance of any closure as part of a stakeholder communications plan, to be part of your Code of Construction Practice or your Construction Traffic	We can confirm any PRoW closures will be made public as part of the Communication Strategy, as provided for in the updated Framework ConstructionEnvironmental Management Plan submitted at Deadline 2 [EN010106/APP/6.2_Rev02]. This is secured via Requirement 14 of the draft DCO. However, the closures identified are considered the worst-case scenario for the purposes of the EIA. The contractor will assess each of the proposed PRoW closures to consider if the PRoW can remain open to the public in a safe and controlled manner.	In addition to the comments made in response to Q1.10.87, the Councils would refer the ExA to LIR [REP1-024] 14.33 regarding concerns about closure and diversion of PRoW and encourage the applicant to reduce the number and duration of PRoW closures to a minimum.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Management Plan, to be secured through a Requirement in Schedule 2 to the dDCO?		
Q1.10.89	The Applicant	**Temporary PRoW closures** In paragraph 6.1.5 of the Transport Assessment [APP-117] you acknowledge that temporary closures will impact on users, but say that you have not carried out an assessment. Please explain why.	At the time of producing the Transport Assessment [APP-117], it was not considered representative or valid to undertake surveys of the PRoW due to the pandemic and therefore it was not possible to accurately quantify the number ofusers affected by the temporary closures. However, this does not mean that an assessment was not undertaken. An EIA assessment of the impact of the scheme on Non-Motorised Users was undertaken from a range of perspectives, including the effect of temporary PRoWclosures as presented in paragraphs 13.8.62 to 13.8.65, 13.8.128 to 13.8.131, 13.8.159 to 13.8.162 and 13.8.241 to 13.8.245 within the Transport and Access chapter of the ES [APP-045], which is also discussed in the Transport Assessment [APP-117] and also Chapter 6 of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. Based on the locations of the routes, including the destinations that they serve, it was considered reasonable to base an assessment on the likelihood that there will be some Non- Motorised Users (NMUs), but it was concluded that levels would not be so substantial that a temporary closure for three weeks would be classified as a significant adverse effect in EIA terms. This	When considering the safety of PRoW users the applicant must include the provision of safe and suitable diversion routes noting that in many cases diversion will require users to divert onto narrow local roads with little if any footway provision or crossing points.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			is particularly the case as the routes in question are likely to be mostly used as leisure routes, of which there are a range of alternatives in the locality. To provide further confidence to this conclusion, PRoW surveys were carried out in July 2022 to capture the existing usage of the PRoW that are proposed to be temporarily closed. The results of the PRoW surveys identified a low number of daily users of the PRoWs. As a result, and taking account of the July 2022 surveys, the conclusion presented in the Transport Assessment and Transport and Access chapter of the ES [APP-117] remains unchanged and it was concluded that there would be no significant adverse impact on NMUs as a resultof the PRoW closures during the construction period. Through discussions with the Local Highway Authorities, it is understood that their preference is to avoid PRoW closures where they are required for vehicles to cross the PRoW, with the preferred method to be the use of marshals (banksman/banks person) to enable uses of the PRoW to cross the point the closure is required. This was discussed during the 4th October video conference meeting with the Local Highway Authorities. This is supported by the Applicant, however, the contractor will make the final decision as to whether marshals can be used, and this will be decided on a case-by-case basis based on health and safety of workers and users of the public	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			rights of way. As such, the ES assesses temporary closures, rather than managed crossings, for the purpose of a robust assessment, i.e. a worst-case scenario. Further information on the additional PRoW surveys that were carried out isprovided in Section 10 of the Transportation Technical Note submitted at Deadline 2 [EN010106/APP/8.42].	
Q1.10.90	The Applicant	**Temporary PRoW closures** Please confirm that the public rights of way (PRoW) listed in paragraph 6.3.9 of ES Appendix 13C [APP-118] are to be closed temporarily rather than permanently.	The PRoW to be temporarily closed for a maximum of three weeks during the construction of the Scheme are as follows: W-257/002/X; W-257/007/0; W-257/003/0; W-257/002/0; 49/7; 204/1; 92/19; and 35/10. Further details on the proposed temporary PRoW closures are provided in the Applicants response for Q1.10.89 and in Section 10 of the Transportation Technical Note [EN010106/APP/8.42]. It should also be noted that the draft DCO does not contain any powers to permanently stop up any highway or public right of way.	The Councils are seeking a requirement for the applicant to agree with the appropriate LHA alternative diversionary routes for PROW proposed to be stopped up, and to agree appropriate signage and management. The Councils would be open to facilitating this by means of a highways side-agreement.
Q1.10.91	The Applicant	**Construction staff car share: occupancy factor** In paragraph 5.4.4 of the Transport Assessment [APP-117] you cite an actual average vehicle occupancy	The headline car occupancy value from Hinkley Point C has been used in the assessment as there is limited UK construction project data available in the publicdomain for outturn car occupancy data, rather than forecast data. Furthermore, the 1.5 car occupancy parameter has been	As set out in the Councils' LIR [REP1-024] the figures from Hinkley Point, importantly the car share factors being experienced at that time, were approximately 1.3 workers per car. The use of 1.54

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		value of 1.54 obtained from the Hinkley Point C project and say that "*applying a staff car share factor of 1.5 persons per vehicle for Sunnica is considered appropriate.*". Has the figure of 1.54 been achieved consistently throughout the Hinkley Point C project to date? By appropriate, do you mean applicable to this project? If so, explain your reasoning. What measures did the Hinkley Point C project take to achieve the figure of 1.54? Do you propose to take any of these measures? Are you able to provide other examples of similar projects where a value of 1.5 or more has been consistently achieved? Given the very different locations and relative lack of knowledge of where your staff will live, explain why you are confident of being able to achieve a staff car share	used and accepted in the recent Sizewell DCO which was granted development consent in July 2022. As such it was considered to be a reasonable basis for the assessment. We are not aware of any publicly available data on whether Hinkley Point C has consistently achieved a staff car occupancy of 1.54 throughout the lifespan of the project to date, or whether it is an average. The LHAs have also asked for further evidence on whether 1.5 is an appropriate vehicle occupancy parameter. A review has been undertaken on the staff vehicle occupancy assumptions used for other DCOprojects, using publicly available Examination Documentation, to determine if the current assumption of 1.5 staff per vehicle, which represents a 67% car driver mode share, is applicable for the type of Scheme. The review considers a range of energy projects in order to gather a large sample size focusing on wind, solar and power stations examples in analysis. This included four wind farm examples and three solar farm examples as well as three power station examples because the Applicant considers these appropriate construction schemes to use as comparable examples. The review showed that a 1.5 average staff vehicle occupancy has been used for a variety of DCO projects under the Planning Act 2008 and several schemes assumed a higher average car occupancy (up to 3 people per vehicle). The majority of schemes used factors of 1.5 average	workers per car was for non-home based workers only, with home based workers remaining at 1.1 workers per car, and so applying 1.5 across the project is not considered reasonable. It is not considered reasonable to quote agreed car share factors from management plans for other DCOs without specific consideration for each development. Ideally, details of actual car share ratios for delivered projects of a similar nature should be obtained from monitoring reports. As set out in the Local Impact Report [REP 1-024], the Councils do not accept the 1.5 figure without relevant monitoring and controls. It is true that it has been used at a number of projects, but it is not necessarily an appropriate comparison if the measures in place to achieve that 1.5 car share or the number and location of staff are not comparable across the different projects. The 1.3 figure is taken from monitoring at Hinkley Point, which

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		factor of 1.5 persons per vehicle for Sunnica. In the event that a figure of 1.5 is not achieved, what steps will you take?	vehicle occupancy or greater, including three wind projects and one solar project. Furtherinformation on the review and the DCO projects that have been compared is provided in section 3 the Transportation Technical Note [EN010106/APP/8.42]. This also presents a sensitivity test demonstrating that the conclusions of the ESwould remain valid if a lower level of car occupancy (1.3) was achieved. This factor (1.3) was chosen as the lowest car occupancy of all the DCO projects in the aforementioned review. At this stage in the project, it is unknown where the construction staff will come from. The 30km travel distance for staff assumption is broadly in line with the latest UK-wide Construction Industry Training Board (CITB) Construction workforce mobility reporting (2018/19) which finds workers travel a mean distanceof 18 miles (circa 29km) to work. Whilst it is appreciated that a 30km radius is a relatively wide area, this is typical of major construction projects, for which a 1.5 or greater average vehicle occupancy is commonly used. Within that 30km there are likely to be clusters of staff within population centres, who will be able to car share. The assessment does not rely on this to achieve a 1.5 staff car occupancy rate, as it is not possible to define this level of detail at this stage of the project, but it is highly likely and will further increase the level of car sharing. As demonstrated in the review of similar DCO schemes, the car	whilst useful, also reflects a different scale of workforce with mitigation measures which are greater in scope. As set out in our LIR [REP1-024], the Council do not agree with the socio-economic assessment and therefore the assessed origin of staff movements. However, if relevant controls, monitoring and reporting are agreed that secure that the assessed worker vehicle movements will not be exceeded, then it becomes unnecessary for the Councils to agree the car share ratio. As the Applicant notes, the measures used are fairly common, and the only project for which we have access to monitoring (Hinkley Point C) indicates that they have failed to achieve the predicted breakdown. Unfortunately no acceptable data is available from consented schemes in Suffolk although the

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			share factor is considered robust for considering staff vehicle trips. The 30km travel distance is discussed further in Section 3 of the Transportation Technical Note [EN010106/APP/8.42]. The Framework Construction Traffic Management Plan and Travel Plan [APP-118] will be the mechanism by which measures will be introduced to achieve the equivalent of a 67% car driver mode share, which is equivalent to all staff travelling by car with a 1.5 vehicle occupancy. This is outlined in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. As per the usual approach, at Framework stage it includes examples of the strategy to be used and potential measures to be implemented. When more detail is known on the future workers, a detailed CTMP and Travel Plan will be developed for approval setting out the specific measures to be introduced, asrequired in a requirement under the dDCO. As part of the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301], staff will be encouraged to lift share. The benefits of car sharing will be promoted to staff, such as reduced fuel costs, ease of parking with possibility of dedicated spaces for those sharing provided nearer to the mini-bus collection points within the compounds. In addition, a Car Share Scheme will be implemented which will actively match potential sharers and be available to staff so	first monitoring report for EA3 is anticipated in the near future.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			that they can find their own match as well as that identified bythe Transport coordinator. The potential to use the mini-bus to collect clusters of staff will also be investigated, and implemented depending on its feasibility. The measures set out above are relatively common for major construction projects at this stage of the DCO process, and it has been demonstrated that thecar occupancy proportion used is comparable.	
Q1.10.92	The Applicant			
Q1.10.93	The Applicant			
Q1.10.94	The Applicant			
Q1.10.95	The Applicant			
Q1.10.96	The relevant highway authority			
Q1.10.97	The Applicant			
Q1.10.98	The relevant local planning and highway authorities			
Q1.10.99	The Applicant	**Assessment: new traffic data** Paragraph 13.3.1 of the Transport and Access chapter of the ES [APP-045] highlights the limitations and the assumptions made in respect of the assessment.	The potential to undertake additional traffic surveys to provide further confidencein the conclusions in the ES was discussed with the Local Highway Authorities and is set out in detail in Section 4 of the Transportation Technical Note [EN010106/APP/8.42]. It was agreed between the Applicant and the Local Highway Authorities that there are areas where additional data would increase	The Councils have reviewed the Transport Technical Note. Our response is set out in brief appended to this document. As set out at Section 6.1 of the LIR [REP1-024], there are a number of conclusions relating to sensitivity of links and dismissal of

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Since the easing of public health restrictions in March of this year, have you collected any new traffic data to assess whether traffic flows are returning to normal and to assist in filling gaps in the data available to you prior to submitting this application? If so, how does the new information inform your assessment of the impacts and consequential effects of construction traffic and the consequential need for mitigation, particularly in tranquil locations? If not, do you have any proposals to gather new and more up to date information to help you to assess the impacts and mitigate the effects of construction traffic more accurately?	the level of confidence in the conclusions through providing a more comprehensive geographical coverage of data. These locations are as follows: La Hogue Road; Elms Road (to the west of the A11 Northbound Off-Slip T-Junction); Freckenham Road; and A142 and Burwell. The Local Highway Authorities were unable to provide any additional data. Additional traffic surveys were therefore carried out from Thursday 7th to Wednesday 13th July 2022, with the LHAs provided with an opportunity to comment on the survey scope (no comments were received). The traffic surveysincluded Elms Road, the A11/Elms Road T-Junction, La Hogue Road and Freckenham Road. It was agreed with the Local Highway Authorities that there was no additional data requirement for the A142 and Burwell, given low number of staff and HGVs, and therefore there was no need to undertake additionalsurveys to provide additional confidence in the assessment conclusions. The analysis applied within Chapter 13 — Transport and Access of the Environmental Statement [APP-045] has been updated using the July 2022 survey data. This includes severance, driver delay and fear and intimidation. Theresults of the updated analysis indicate that in the AM and PM development peakhours the links in question are forecast to have either a	impacts that the Councils do not agree with.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			negligible or minor adverse impact in terms of severance, pedestrian delay, pedestrian / cycle amenity and fear and intimidation. This is not considered to be significant in EIA terms.	
Q1.10.100	The Applicant	**Assessment: professional judgement** In paragraphs 13.3.2 and 13.4.5 of the Transport and Access chapter of the ES [APP-045] you say that in the absence of baseline traffic data professional judgement has been applied to form a conclusion. Please give examples of instances where you have done this. What evidence do you have that baseline flows are returning to normal following the lifting of public health restrictions? Would the availability of new data now that the public health restrictions have been lifted be a useful validation of your professional judgement? In line 4, to which paragraph are you referring in respect of the assessment of links where the traffic flows are	In Chapter 13 — Transport and Access of the Environmental Statement [APP- 045], professional judgement was applied for the assessment of locations where there were acknowledged limitations in the coverage of baseline traffic data available at the time the report was produced, and traffic surveys could not be carried out due to the impact of Covid restrictions on traffic flows. These locationsincluded Elms Road, the A11/Elms Road T-Junction, La Hogue Road and Freckenham Road. As discussed in the response for Q.1.10.99, since the production of the Transport Assessment [APP-117], traffic surveys were undertaken in July 2022 at the locations where availability of new data would be a useful validation of the conclusions drawn. The analysis undertaken within Chapter 13 — Transport and Access of the Environmental Statement [APP-045] has been refreshed utilising the July 2022 survey data. The results of the analysis indicate that in the AM and PM development peak hours there will be no significant effects in terms of severance,pedestrian delay, pedestrian / cycle amenity and fear and intimidation. Therefore, it is considered that the conclusions of the Transport and Access chapter remain valid. Further details on the additional traffic surveys and the	The Council have reviewed the Transport Technical Note. The Applicant has quoted IEMA rule 1; this applies to both total traffic and its HGV proportion and needs to be assessed for peak hour, the hour of greatest change and daily traffic flows. The Applicant should confirm that all these time periods were included within the assessment when determining the area of impact.

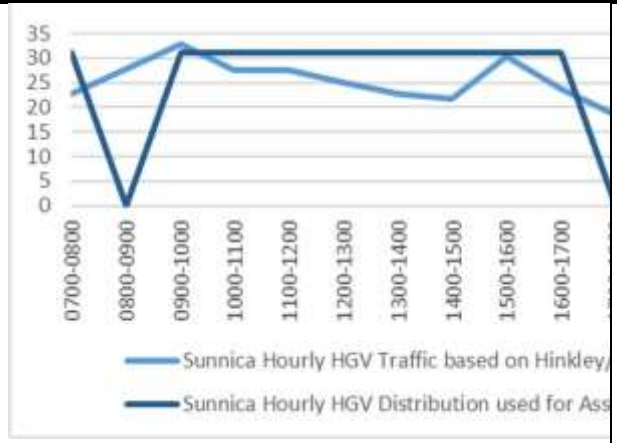
ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		predicted to increase by more than 30%? If traffic flows do not return to normal, would there be additional links requiring assessment?	analysis are provided in Section 4 of the Transportation Technical Note [EN010106/APP/8.42]. Discussion on whether baseline flows are returning to normal is set out in Q1.10.67. This states that traffic data has been obtained from WebTRIS for locations which have both 2019 and 2022 data available to determine if traffic flows have returned to pre-Covid levels. Traffic data for 2022 was only available up to August. The January to August 24-hour Average Daily Traffic (ADT) and 18 Hour Average Weekday Traffic (AWT) has been used for the comparison as this data is available for both years. This comparison indicates that 2022 traffic flows on the A11 and A14 between January and August are between 5% to 12% lower than the January to August 2019 average. In summary, indications at this stage are that traffic flows are not substantially lower than pre-covid levels, although thiswill vary in different locations The increase in traffic flows of more than 30% is the rule which has been appliedto determine the study area for assessment for Chapter 13 — Transport and Access of the Environmental Statement [APP-045]. This refers to Rule 1 of the IEMA guidelines which is set out in paragraph 13.4.4. No further links would need to be assessed if traffic flows do not fully return topre-Covid levels, as the selection of links to be assessed is predominantly influenced by the	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			level of construction staff or HGVs forecast to use each link,rather than exact levels of baseline flow. Thus, the ES has assessed the links which are forecast to experience increases in traffic as a result of the constructionof the Scheme, which would not change if baseline traffic flows do or do not return to normal.	
Q1.10.101	The Applicant			
Q1.10.102	The Applicant			
Q1.10.103	The Applicant	**HGV deliveries** At the foot of page i of the Executive Summary of the Transport Assessment [APP-117] you say that "*The proportion of HGV deliveries using the determined delivery routes cannot be determined at this time and the 155 HGVs per day have been evenly distributed between the A11 North, A14 East and A14 West …*". In the absence of defined numbers on each delivery route, please explain how an even distribution of trips is statistically robust and thereby provides a proper assessment of impacts. In this situation, would a more robust and conservative	At this stage the proportion of HGV deliveries using the identified delivery routes cannot be determined. It is a reasonable assumption that all HGVs will not originate from the same location or travel from the same direction. Assessing all 155 HGVs on all of the HGV delivery routes is not considered to be a realistic worst-care assessment of the impact of the construction HGVs. The assessment of an equal proportion of delivery routes on the Strategic Road Network has beenagreed as appropriate with National Highways. This is confirmed in Table 2 of theStatement of Common Ground with National Highways, submitted at ExaminationDeadline 2, which sets out that the assessment methodology, assumptions and findings are agreed. Table 6-2 in the Transport Assessment [APP-117] sets out the 2023 baseline HGVs along the A11 and A14. From this table, the lowest number of HGVs forecast on the Strategic Road Network between 07:00 and 19:00 in a single direction in 2023 is on the	The peak HGV deliveries can be determined using the data in Plate 2 of the Transport Assessment (APP-117) and as presented in Table 10 of the LIR (REP1-024). However, this information does not include the proportion of varying sizes of HGV. The application does not include sufficient information, for example sizes and construction of car parks, hard standings or haul roads to enable an independent assessment of the transport requirements for this project. In the absence of such data the application of robust controls, monitoring and enforcement, so that the assessed volumes of traffic are not exceeded, is of critical importance.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		assessment of the impacts of HGV trips at this stage be obtained by assigning all trips to each delivery route?	A14 (East of Junction 38) with 2,144 HGVs. If we assume that all 155 development related HGVs will use this route to travel to the Scheme, this would result in a 7% increase in HGVs at this point of the A14. This is the highest proportional impact that would be forecast to occur on the Strategic Road Network if all HGVs were assumed to use any one of the identified HGV routes. Therefore, the conclusion that the development-related construction HGVs are not forecast to have a significant impact on the Strategic Road Networkis still valid. Within the IEMA guidance, Rule 1 outlines '*highway links where trafficflows will increase by more than 30% (or the number of heavy good vehicles by more than 30%)*' and Rule 2 outlines '*other specifically sensitive areas where traffic flows have increase by 10% or more*'. Therefore, the percentage increase forecast is less than those outlined in the two IEMA rules, meaning that it is reasonable to conclude that any resulting impact would not be significant. Having left the Strategic Road Network, the use of the local highway network hasbeen determined based on the access at which those HGVs would be required, i.e. the known destination rather than the unknown origin of the trips.	
Q1.10.104	The Applicant	**HGV deliveries** On page ii of the Executive Summary of the Transport Assessment [APP-117], given	The distribution of the HGVs on the local highway network is set out in section 5 of the Transport Assessment [APP-117]. Plate 2 and Plate 3 in the Transport Assessment diagrammatically show the construction	The Councils advised the use of Hinkley Point C, as it was aware of the profiles being available. Whilst the project is comparable in

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		that there will be no deliveries during network peak hours, you appear to arrive at a figure for the number of HGVs on the local road network associated with the construction of the Proposed Development by an even distribution across the non-peak working hours. i) In the absence of defined numbers on each local delivery route, please explain how an even distribution of trips is statistically robust and thereby provides a proper assessment of impacts. ii) In this situation, would a more robust and conservative assessment of the impacts of HGV trips on the local road network be obtained by assigning all trips to each delivery route?	HGV distribution on local roads for the daily peak number of HGVs and daily average number of HGVs in asingle direction. It is unclear from the question whether the issue with an even distribution relatesto the previous question regarding origins on the Strategic Road Network, i.e. geographically, or an even distribution of trips through the day, i.e. temporally. Forclarity, an answer to both is provided. Having left the Strategic Road Network, the use of the local highway network hasbeen determined based on the access at which those HGVs would be required, i.e. the known destination rather than the unknown origin of the trips. The assessment of HGV impacts on the local road network therefore is not reliant onthe even assignment of trips across Strategic Road Network arrival points. During discussions with the LHAs, questions were raised regarding the assumption of an even distribution of HGVs throughout a construction day. Based on professional experience, this approach is both commonly taken and a reasonable assumption. Furthermore, the use of an even distribution to identify a peak hourly flow of HGVs is considered robust as it excludes network peak hours. At the request of the LHAs, further analysis has been undertaken on the hourly numbers of HGVs using the temporal distribution applied to the Sizewell C PowerStation which was based on observed HGV profiles at Hinkley Point C. The LHAsadvised that	having significant HGV movements, its value as a comparison site is limited given the relative scale and types of projects. The assessment method though is not considered unreasonable, albeit that movements have been allocated to hours of operation that the Applicant is not using e.g. 1900 hours to 2300 hours. However, the Councils also note that an additional assessment is included in [REP2-041], where the additional hours are proportionately allocated, and welcome the additional assessment and can conclude that the alternative profile would not materially affect conclusions. The Councils do however remain concerned that it has not had adequate reassurance that peaks in daily HGV movements, such as for large concrete pours at specific locations, will not exceed those estimated by the applicant.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			they considered this a comparable example project for this purpose. Using the Sizewell C distribution identifies a peak inbound movement of 20 HGVs compared to 16 based on the Sunnica distribution and the Sizewell C Power Station identifies a peak outbound movement of 17 HGVs compared to the Sunnica distribution of 16 outbound HGVs. When comparing the two-way HGV traffic flows, the Sizewell C Power Station distribution identifies a peak two-way movement of 33 HGVs whereas the Sunnica distribution identifies a peak two- way movement of 31 HGVs. Therefore, it is concluded the difference in hourly distribution identified is an immaterial difference and the use of an even profile, excluding peak hours for the purposes of Chapter 13 — Transport and Access of the Environmental Statement [APP-045] is reasonable as the conclusions of the assessment would remain unchanged. The graph below illustrates the Sunnica daily peak number of HGVs (155) basedon the Sunnica and Hinkley Point C/Sizewell C distributions.	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			 Further details on this assessment are provided in section 5 of the Transportation Technical Note [EN010106/APP/8.42].	
Q1.10.105a	The Applicant	**HGV deliveries** In respect of a more robust and conservative assessment of likely actual HGV movements on local roads, and assuming that the HGV measures and controls outlined briefly in section 7.2 of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] are in place, please i) detail the difference in HGV flows on sensitive links; ii) explain why you do not consider this to have a	It is not a realistic worst case to assume that all HGVs will use a single arrival route from the Strategic Road Network (SRN) due to the widespread locations of HGV site access points for the Scheme. The HGV arrival profile on the SRN has not influenced the trip profile on the local highway network. Therefore there wouldbe no difference in HGV flows on sensitive links, and thus no change in impact onthe local highway network in comparison with that already assessed. Within the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS301], management measures and controls are outlined in chapter 6.This includes a Delivery Management System (DMS), HGV routes, HGV timing restrictions, HGV emission standards, communications strategy, site accesses and cranes and AIL	The Council are content with the assessed figures assuming that relevant controls, monitoring, enforcement and reporting is in place. The exact detail of this will need to be agreed. The Applicant needs to outline the reporting of this information to the relevant authorities to ensure compliance is evidenced.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		significant impact on the local highway network; and iii) explain what measures you will take to mitigate the impacts and how these will be secured in the Order.	management measures. A DMS 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. In addition, a Traffic Management and Monitoring System (TMMS) will be developed. The TMMS will provide details of the technologies and other means employed to monitor HGVs to/from the development site (e.g. Global Positioning System (GPS), Automatic Number Plate Recognition (ANPR)). This will enablethe Applicant to monitor the following: Compliance with the HGV routes; Compliance with the number of HGV limits in terms of number of deliveries arriving and departing at any one time and over the course ofthe day; and Compliance with the timing restrictions. The DMS and the TMMS are provided for in the updated Framework ConstructionTraffic Management Plan and Travel Plan [AS-300, AS-301]. This is secured under the draft DCO — the relevant requirement in Schedule 2 to the draft DCO requires the relevant authority's approval of the CTMP before the commencementof the development, and the CTMP must be substantially in accordance with the Framework.	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.10.106	The Applicant	**Staff travel** In respect of staff traffic during construction, the fourth paragraph on page ii of the Executive Summary of the Transport Assessment [APP-117], says that "*The peak number of vehicles associated across the Scheme is 937 staff vehicles per day …"*. Paragraph 2.4.5 of ES Appendix 13C Framework Construction Traffic Management Plan and Travel Plan [APP-118] quotes the peak number of staff as 1393 (implying that average vehicle occupancy will be 1.5) and in section 7.2 you provide a brief outline of staff vehicle measures and controls. You conclude on page iii of the Executive Summary of the Transport Assessment [APP-117] that "*the proposed Scheme is not considered to have a significant impact on the highway network …*" Please	The LHAs have also asked for further evidence on whether 1.5 is an appropriate vehicle occupancy parameter. A review has been undertaken on the staff vehicle occupancy assumptions used for other DCO projects, using publicly available Examination Documentation, to determine if the current assumption of 1.5 staff per vehicle, which represents a 67% car driver mode share, is applicable for the type of Scheme. The review considers a range of energy projects in order to gather a large sample size and focused on wind and solar examples in analysis. The review showed that a 1.5 average staff vehicle occupancy has been used for a variety of granted applications considered by PINS schemes and several schemes assumed a higher average car occupancy (up to 3 people per vehicle). The majority of schemes used factors of 1.5 average vehicle occupancy or greater, including three wind projects and one solar project. Further information on the review and the PINS schemes that have been compared is provided in section 3 the Transportation Technical Note [EN010106/APP/8.42]. This also presents a sensitivity test demonstrating that the conclusions of the ES would remain valid if a lower level of car occupancy (1.3) was achieved. This factor (1.3)was chosen as the lowest car occupancy of all the DCO Construction Projects in the aforementioned review. At this stage in the project, it is unknown	As set out in the Local Impact Report [REP 1-024], the Councils do not accept the 1.5 figure without relevant monitoring and controls. It is true that it has been used at a number of projects, but this is not based on survey data but an assumed rate. Nor is it necessarily a fair comparison if the measures in place to achieve that 1.5 car share or the number and location of staff are not the same across the different projects. The 1.3 figure is taken from monitoring at Hinkley Point, which whilst useful, also reflects a different scale of workforce with different mitigation measures. As set out in our LIR [REP1-024], the Council do not agree with the socio-economic assessment and therefore the assessed origin of staff movements. Whilst there is a commitment at paragraph 7.2.22 to *'not exceed the staff vehicle forecast'.* There is limited detail on how this will be achieved, and how this would

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		i) explain why you think that this average vehicle occupancy figure is realistic; ii) provide more detail on how it will be achieved; iii) detail the difference in traffic flows on sensitive links; iv) explain why you do not consider this to have a significant impact on the local highway network; and v) explain what measures you will take to mitigate the impacts and how these will be secured in the Order.	where the construction staff will comefrom. The 30km travel distance for staff assumption is broadly in line with the latest UK-wide Construction Industry Training Board (CITB) Construction workforce mobility reporting (2018/19) which finds workers travel a mean distanceof 18 miles (circa 29km) to work. Whilst it is appreciated that a 30km radius is a relatively wide area, this is typical of major construction projects, for which a 1.5 or greater average vehicle occupancy is commonly used. Within that 30km there are likely to be clusters of staff within population centres, who will be able to car share. The assessment does not rely on this to achieve a 1.5 staff car occupancy rate, as it is not possible to define this level of detail at this stage of the project, but it is highly likely and will further increase the level of car sharing. As demonstrated in the review of similar DCO schemes, the car share factor is considered robust for considering staff vehicle trips. The Framework Construction Traffic Management Plan and Travel Plan [APP-118] will be the mechanism by which measures will be introduced to achieve the equivalent of a 67% car driver mode share, which is equivalent to all staff travelling by car with a 1.5 vehicle occupancy. This is outlined in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-278, AS-279]. As is typical for a CTMP and Travel Plan, at Framework stage it includes examples of the strategy to be used and potential measures to be	necessarily reflect the car share proportions for the length of the project, given that the number of staff changes. Specific details on the frequency and details for monitoring and reporting should be outlined. Whilst car sharing may be encouraged, without monitoring and reporting it remains a risk to achieving the assessed impacts. As the Applicant notes, the measures used are fairly common in DCO management plans, and the only project for which we have access to monitoring data (Hinkley Point C) indicates that they have failed to achieve the predicted breakdown.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			implemented. When more detail is known on the future workers, a detailed Travel Plan will be developed for approval setting out the specific measures to be introduced, as required under the dDCO. As part of the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301], staff will be encouraged to lift share. This is outlined in the updated Framework Construction Traffic Management Plan and Travel Plan [AS-278, AS-279]. The benefits of car sharing will be promoted to staff, such as reduced fuel costs, ease of parking with possibility of dedicated spaces for those sharing provided nearer to the mini-bus collection points within the compounds. In addition, a Car Share Scheme will be implemented which willactively match potential sharers and be available to staff so that they can find their own match as well as that identified by the Transport coordinator. The potential to use the mini-bus to collect clusters of staff will also be investigated, and implemented depending on its feasibility. The measures set out above are relatively common for major construction projects at this stage of the DCO process, and it has been demonstrated that thecar occupancy proportion used is comparable.	
Q1.10.107	The Applicant	**Staff travel** With reference to the second paragraph on page iii of the	The Applicant can confirm that this is correct. Staff will be directed to use the Strategic Road Network (A11 and A14) and the Primary Route Network (A142) when	Whilst staff will be directed to use the SRN, there is no control, monitoring or enforcement that

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		Executive Summary of the Transport Assessment [APP-117] please confirm that staff will always be directed to use the strategic road network (SRN) (A11 and A14) and also the primary route network (PRN) [A142] to travel to and from the Proposed Development.	travelling to/from the Scheme, as outlined in paragraphs 7.2.21 and 7.2.25the updated Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301]. This is secured under the draft DCO - Requirement 16 in Schedule 2 to the draft DCO requires the relevant authority's approval of the CTMP before the commencement of the development, and the CTMP must be substantially in accordance with the Framework.	requires them to do so, and it is likely that like most drivers they will use the route to their destination that they prefer. This is of importance as workers are likely to cut across country from the A11 to the A14 towards Bury St Edmunds due to the restricted junction layout at the A11/A14 junction. That this occurs is implied by the flow diagrams in the Transport Assessment (APP-117) Figure C5
Q1.10.108	The Applicant			
Q1.10.109	The Applicant	**Change application** In Table 3-5 on page 53 of the Scheme Description [AS-249] an estimate is given of the number of crane and low loader movements and that there would be fewer movements if Option 2 is not selected. • How many crane movements and how many low loader movements would be required if Option 2 is not selected?	If Option 2 is not selected and the extension of the Burwell National Grid is not required, then seven fewer crane movements would be required as they are already included within the count for Sunnica West A. The same number of lowloaders would still be required in order to transport the transformers to site.	As per our response to Q1.10.10. These numbers are expected numbers, and there are no controls on them, meaning that movements may exceed those reported.
1.11	**Water Resources, Flood Risk and Drainage**			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.11.1	The Applicant	**Flood risk** The flood risk summary on page ii of the Flood Risk Assessment [AS-012] says that pluvial (surface water) flood risk varies with some areas susceptible to surface water flooding, that flooding is localised and that the Applicant will undertake further ground investigation, groundwater monitoring and infiltration testing. i) At which locations does the localised flooding occur? ii) How deep are the flood waters and for how long? iii) What further ground investigation do you intend to undertake; and for what purpose? iv) When, where and for how long do you intend to undertake this further ground investigation, groundwater monitoring and infiltration testing? v) Will the results be made public? vi) How will this work inform good design?	In response to each point: Page 3 of Annex C, Environment Agency Flood Map for Planning, of the FRA, Appendix 9-C [AS-008] indicates the Order Limits on the plan using the latest mapping from the online flood map for planning, indicating where surface water flood risk is present across the Order Limits. Locations are difficult to more particularly describe, as they are in fields at natural low spots. The majority of these low spots where ponding may occur are in Sunnica West, PV Areas W04,W06 and W07. The majority of the Order limits are at low risk (0.1%AEP) of flooding (noted on Page 3, Environment Agency Flood Map for Planning, of Annex C, FRA [AS-008],with only a few areas up to 900mm deep (from the online Gov.uk mapping). In these areas, the drainage strategy proposes to retain these as natural detention basins (as noted in section 3 of the Drainage Technical Note within Annex F or the FRA Part 4 [AS-010]). For return periods of 1% AEP and below, the mapping shows these PV areas are unlikely to have deep water (<300mm deep). The surface water risk is still considered to be low.The duration of surface water flooding is not provided by the online flood map for planning. Infiltration testing to a nationally recognised standard will be secured through the requirement 12 of the draft DCO (see also page 48 of the Construction Environmental Management Plan [AS-277] second bullet, which is itself secured through requirement 14) to assist in	Sunnica East B is either at very low or low risk of surface water flooding, so no further comment is provided with respect to flood risk at this time from Suffolk County Council. Cambridgeshire County Council notes the ponding at W04, W06 and W07. The Councils support the proposal to undertake ground investigation and request that this include BRE365 infiltration testing, geological borehole logs and identification of depths to groundwater (to ensure maximum levels are recorded). The ground investigation works should be done as early as possible to inform good design.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			determining drain down times for surface water runoff features. This will inform the detailed design and assist insizing of attenuation components. Further ground investigation will be required to confirm the soil for PV panel leg piling, and also to confirm groundwater depths to confirm suitability for the proposed 600mm deep swales. This will be undertaken post-consent either using powers under the DCO [AS-293] or in agreement with landowners, with the specific details to be provided for under the surface water and foul water drainageand ground requirement (requirement 12 of the draft DCO). Ground Investigation locations will be selected to inform the most suitable drainage strategy for detailed design. The groundwater monitoring regime will be agreed as part of the surface water and groundwater DCO requirement (requirement 12) and will take place for a period of time that will includes thewinter season as a minimum. Requirement 12 of the draft DCO [AS-293] requires details of the surface water drainage strategy to be submitted to and approved by the relevant county planning authority prior to commencement of any phase of the authorised development. The Applicant would expect the relevant planning authority to publish information in relation to submissions for approval under requirements in the same manner in which they publish information in relation to discharge of planning conditions.	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			The GI work will inform the construction requirements for PV panel installation,the locations of swales at detailed design, and that the final design depths of swales are suitable for construction, with no increased risk to groundwater qualityfrom surface water runoff.	
Q1.11.2	The Applicant	Please explain how the design of the Proposed Development and the ES assessments have been established in relation to groundwater protection and management in the absence of ground investigation to establish groundwater levels? Please confirm how future ground investigation works would be managed, including what mitigation, monitoring and remedial measures would be in place?	Groundwater levels have been established based on interpretation made by the Environment Agency and their consultants in the conceptual model developmentfor the Chalk aquifer in this area referenced in Chapter 9 - Flood Risk, Drainage and Water Resources [APP-041]. These interpreted levels are provided as groundwater elevation contours within the Order Limits. Depths of site structures that are installed below ground such assolar PV mountings, substation concrete foundations, cable routes, and horizontaldrilling beneath rivers and other surface features have been compared to estimated groundwater levels to determine effects of the scheme in terms of groundwater protection. The Framework Construction Environmental Management Plan [AS-277] describes pollution prevention measures during construction works. This issecured under the DCO. Future ground investigation work will be undertaken post-consent either using powers under the DCO [AS-293], or in agreement with landowners, with the specific details to be provided for under the	The Councils support the proposal to undertake ground investigation and request that this include BRE365 infiltration testing, geological borehole logs and identification of depths to groundwater (to ensure maximum levels are recorded). The ground investigation works should be done as early as possible to inform good design.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			surface and foul water drainage andground conditions DCO Requirements.	
Q1.11.3	The Applicant	ES Chapter 9 [APP-041], paragraphs 9.6.164 and 9.6.165 state that no significant changes to current baseline conditions are predicted for the future baseline, as the main reasons for differences in water body importance are unlikely to change. Please confirm whether the requirement for waterbodies to have 'good' status by 2027 (referred to in paragraph 9.6) affects the potential future baseline for those waterbodies identified currently as having poor ecological or chemical status?	Chapter 9 - Flood Risk, Drainage and Water Resources [APP-041] describes the current and future baseline environment in the area of the Order Limits. Potential impacts have been described and mitigation measures put in place such that the assessment determined that there were no significant effects from the scheme onsurface water and groundwater. The Scheme does not affect the future baseline and therefore does not impinge on the requirement to achieve 'good' status by 2027. Table 9-1 outlines the Criteria to Determine Receptor Importance for the water features. The 'general' criteria is the principle criteria, with the information under each specific category examples of what may fall under each importance grade. Table 9-1 Note 1 also states "The WFD status of a watercourse is not an overriding factor and in many instances, it may be appropriate to upgrade a watercourse which is currently at poor or moderate status to a category of higher importance to reflect its overall value in terms of other attributes and WFD targets for the watercourse. Likewise, a watercourse may be below Good Ecological Status, this does not mean that a poorer quality discharge can be emitted [deterioration is not permitted irrespective of the starting WFD class]." Overall, a holistic approach to water body importance is used	WFD targets are the remit of the Environment Agency and the Councils defer to them for comment on this matter. The Internal Drainage Board (IDB) should be consulted for any works on watercourses within their area. The Councils advise that land drainage consent will be required for any works to an ordinary watercourse that may impact the flow within it. Furthermore, that culverting of watercourse should be avoided if possible and wherever this is unavoidable, the length culverted should be as short as possible and as large a pipe section as achievable.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			based on scale, flow, whether a watercourse is designated or not under the WFD, ecological designations and presence of protected species, and social-economic uses such as abstractions for potable supply. WFD status (and individual parameter classes), and water quality more generally, are not used in the criteria for the reasons stated in Note 1of Table 9-1. The criteria to determine the importance of the receptor is defined inTable 9-1 of Chapter 9 — Flood Risk, Drainage and Water Resources [APP-041]. For surface water, whether the watercourse has a designated WFD status and its receiving flow is one determining factor. If a watercourse is currently Poor, status or potential, and with a receiving flow of under $1m^3$/sec the water feature will be considered to be of High Importance. If the watercourse meets Good status or potential in future, this will still be deemed to be a High Importance receptor. Therefore, whether a water body may improve in the future from one WFD status class to another is not relevant to the decision of its importance.	
Q1.11.4	EA			
Q1.11.5	The Applicant	ES Chapter 9, section 9.7.18 [APP-041] states that "*For this assessment, it has been assumed that launch and receive pits will be no greater than 4m by 3m by 2m deep*". Would the relatively shallow	The launch pit is not required to be at the same depth as the deepest part of the directional drilling due to the directional drilling travelling downwards at an angle from the launch pit to travel under the watercourse before angling upwards again to meet the receive pit on the far side of the watercourse. Appropriate dimensionsfor the	The Councils advise that land drainage consent will be required for any works to an ordinary watercourse that may impact the flow within it. Furthermore, that culverting of watercourse should be avoided if possible and wherever this is unavoidable, the length culverted

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
		depth of the pits be adequate to achieve the required 2m minimum headroom under the watercourse? Please provide details on the design process so that the ExA may understand how these dimensions have been arrived at.	launch pits were advised by experienced contractors and the depth of the launch pits is expected to be adequate to achieve the required 2m minimum headroom under the watercourse.	should be as short as possible and as large a pipe diameter installed as achievable.
Q1.11.6	The Applicant	ES Chapter 9, section 9.7.18 [APP-041] states that "*The fluid component of the drilling mud would be mains water, obtained from a nearby supply*". Please confirm the likely extent of the supply required and how the potential effects of the drilling methodology have been assessed?	The water for the drilling mud will be sourced from a supply point on the existing mains network and it is not anticipated that the volumes required would have an impact on local supplies or infrastructure. Potential effects of the drilling methodology are addressed in ES Chapter 9 [APP-041], which considers the riskof pollution to groundwater and surface water during construction (the risk associated with the break-out of drilling fluids or their spillage on land is included in the assessment of pollution risks to each water body). Measures to mitigate risks associated with the use of drilling fluids for non-intrusive techniques for cable route construction are included in the Framework CEMP [AS-277], see for examples pages 16C-11 to 16C-12 and 16C-28 to 16C-30.	The Councils request a construction surface water management plan is provided at the appropriate time to cover flood risk and pollution related matters that may arise during the construction period. This could be included as a component of the CEMP.
Q1.11.7	The Applicant			
Q1.11.8	The Applicant			
Q1.11.9	The Applicant			
Q1.11.10	The Applicant			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.11.11	The Applicant	Table 9-13 in Chapter 9 ES [APP-041] shows the watercourse crossing methodologies. For cable route construction and installation below watercourses the exact dimensions of excavations for launch and receiving pits await future site and ground investigation (paragraph 9.3.5). Please confirm all such excavations will take place within the Order limits.	Dimensions of the launch and receive pits are described in paragraph 9.7.18 ofChapter 9 of the ES [APP-041]. All excavations will be within the Order Limits.	The Councils advise that land drainage consent will be required for any works to an ordinary watercourse that may impact the flow within it. Furthermore, that culverting of watercourse should be avoided if possible and wherever this is unavoidable, the length culverted should be as short as possible and as large a pipe diameter installed as achievable.
Q1.11.12	NG			
Q1.11.13	The Applicant	Please describe the connection apparatus related to Option 3 specifying the exact location and how it interacts with the surface water drainage system.	The connection apparatus proposed in relation to Option 3 described in the Applicant's Proposed Changes to the Application [AS-243], in particular in chapter 4 (in relation to the 400kV cabling) and chapter 5 (in relation to the 33kVto 400kV transformers) and would be located within the limits of deviation for Work Nos. 3A, 3B and 3C shown on the Works Plans [AS-258] and in relation tothe 400kV cabling, within the limits of deviation shown on the Works Plans for Work No. 4. As is set out in the Applicant's Proposed Changes to the Application, should Option 3 be taken forward, the substations at Sunnica West Site A, Sunnica EastSite A and Sunnica East Site B will need to change in terms of their electrical configuration and	If any changes to the proposed drainage strategy were to become necessary, they should be thoroughly assessed and associated calculations, plans and details provided in an updated drainage strategy.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			therefore their general arrangement and layout would also be different, but within the parameters assessed in the ES submitted as part of the Application. This is owing to the introduction of a 33kV/400KV transformer in place of the 33kV/132kV transformers that would be required under Options 1 and 2. A shunt reactor would also need to be introduced at Sunnica East Site B. Further details pertaining to Option 3 are provided in the Proposed Changes to the Application Document [AS-243] which confirms that the proposed change is within the parameters as assessed in Chapter 9: Flood Risk, Drainage and WaterResources [APP-041] of the ES; therefore, there are no changes to the assessment as a result of NMC-03. All mitigation as stated in that chapter will remain, for example bunding. The revised AIL swept path analysis does not haveany effect on the assessment of Flood Risk, Drainage and Water Resources. Should NMC-03 proceed and eliminate the need for Burwell National Grid Substation Extension Option 2, this would result in a reduction in fluvial flood riskof the Scheme and have a beneficial effect for the Scheme (albeit not consideredto be material to the results of the assessment). The area proposed for the substations comprised in Work No. 3 has already been included within the drainage strategy as an area for BESS/Compounds which hasbeen assessed as an impermeable area with	

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			appropriate attenuation provided. Locating the substation in this area will not impact the drainage proposals / runoffrates and volumes. The detail of the drainage solution will be developed so as to be substantially in accordance with the Drainage Strategy, in accordance with Requirement 12 of the draft DCO [AS-293]. Connection apparatus, such as the 400kV cabling, will not impact the drainage strategy as SuDS features are shallow and the 400kV cabling will be designed soas not to conflict the Site's drainage features.	
Q1.11.14	NG			
Q1.11.15	The Applicant			
Q1.11.16	EA			
Q1.11.17	The Applicant	Have you assessed whether the groundwater level estimates in 'Aquifer Designations' at paragraph 9.6.139 to 9.6.152 of ES Chapter 9 [APP-041] are accurate and there would be a minimum of 1.2m clearance between the base of infiltration Sustainable Drainage System (SuDS) and peak seasonal groundwater levels at all relevant locations?	The groundwater levels described are best estimates interpreted from locations of groundwater monitoring across the catchment. These have been determined by the Environment Agency and their consultants. Figure 9-3 [APP-190] and Chapter9 [APP-041] include peak seasonal groundwater levels. Groundwater and SuDS proposals are discussed in Appendix 9C FRA Parts 1 and 4 [AS-007] and [AS-010]. Measured clearance to groundwater levels will be confirmed during GI surveys which is secured by the surface and foul water drainage and ground conditions Requirements under the draft DCO [AS-293]. This will be undertaken either in	The Councils support the proposal to undertake ground investigation and request that this include BRE365 infiltration testing, geological borehole logs and identification of depths to groundwater (to ensure maximum levels are recorded). The ground investigation works should be done as early as possible to inform good design.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			agreement with landowners or using the relevantpowers under the DCO.	
Q1.11.18	EA			
Q1.11.19	MoD The Applicant			
Q1.11.20	The Applicant	Has the Applicant identified the location(s) of dry watercourses and if so where are these described? How have they been taken into account in terms of their individual propensity for flow or flooding following heavy rainfall?	Main River and Ordinary watercourses were identified during site walkovers and are discussed within the ES (APP-041) and Appendix 9-C FRA (AS-007). No dry watercourses were identified for Sunnica East and West areas. The topographical survey has not identified further watercourses/waterbodies. At this stage of outline design, it is proposed to capture existing greenfield runoff volumes from PV areas within swales and detention basins and new impermeable areas from BESS and compound areas will also be captured in these features to ensure no increase in flood risk to adjacent watercourses, whilst providing a reduction in surface water flood risk downstream. More detail can be found in the drainage technical note in Annex F of the FRA (FRA Part 4; AS-010).	The Councils query the finding that no 'dry watercourses' where identified in the entire east and west areas. Dry watercourses are generally considered to include field ditches, seasonal watercourses, highway ditches and any other drainage related depressions within the landscape. Given the very high occurrence of these in Suffolk and Cambridgeshire, we would expect there to have been several identified during the walk-over and topographical surveys. Further information should be provided with regard to the presence of dry/seasonal watercourse within the Order Limits as failure to acknowledge them now will result in them being excluded from any designs and may result in adverse impacts during the construction period.
Q1.11.21	NE			
Q1.11.22	EA The Applicant			
Q1.11.23	EA			

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
Q1.11.24	The Applicant			
Q1.11.25	The Applicant			
Q1.11.26	The Applicant			
Q1.11.27	The Applicant	What specific measures does the Applicant propose to protect the level of the river Lark against increased rain water run-off, reduction in water absorption due to absence of crops on the Order land, and reduction in large scale water extraction for irrigation?	No significant change to runoff from the change in land use is anticipated to be caused by the scheme because the Drainage Strategy secures the provision of greenfield run-off rates and provides sufficient attenuation to account for climate change [AS-010]. Chapter 9 [APP-041] describes the Water Framework Directive water bodies underlying the site as not being at good status. A reduction in absorption due to absence of crops and reduction in large scale water extraction is beneficial for the status of the water bodies. The Environment Agency Cam and Ely Ouse abstraction licensing strategy document shows that this area is over-abstracted and a reduction in abstraction due to the change in land use is consistent with the aims of the strategy. Although licenced abstractions are typically limited at lower flows, these abstractions would not be continuous and are unlikely to coincide at all times with spate flows, meaning any cessation of their use is unlikely to be a material effect on flood risk. Refer to FRA report and drainage strategy technical note in Appendix 9-C FRA Parts 1 and 4 [AS-007] and [AS-010]. To protect water levels in the River Lark, PV areas are to drain as per the existing Greenfield	All proposed management of surface water should be detailed in site specific drainage strategies and be in accordance with sustainable drainage principles as outlined in the Suffolk SuDS Guidance (Appendix A of the Suffolk Flood Risk Management Strategy), the Cambridgeshire County Council Surface Water Guidance and the national CIRIA SuDS Manual. This will be submitted to the relevant County Planning Authority in accordance with Requirement 12.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			regime, with infiltration edge swales to intercept excess runoff. This will reduce peak surface water runoff into the River Lark, reducing the flood risk downstream. BESS area runoff further south on the Kennett / Lee Brook, will be also intercepted and captured in Swalesand detention basins, and attenuated for the design storm event to ensure no increases in flood risk occurs in the Order limits or elsewhere, in line with planning policy. Requirement 12 in Schedule 2 to the draft DCO [AS-293] requires the Applicant to submit for the approval of the relevant county authority details of its proposed surface water drainage system which must be substantiallyin accordance with the Drainage Strategy.	
Q1.11.28	The Applicant			
Q1.11.29	The Applicant	Please provide comments in relation to the RR of Cambridgeshire County Council (CCC) [RR-1178] at paragraphs 5.2, 5.4, and 5.6 concerning ground water levels, quick storage estimate calculations, the requirement for rainfall data, and a surface water hydraulic model.	Paragraph 5.2:- Please refer to response already provided to RR-1178 (CCC- 031) in [REP1-016] in relation to paragraph 5.2 for infiltration testing approach. Inaddition a ground investigation will be secured in the ground conditions Requirement 14 in the draft DCO [AS-293], to confirm groundwater levels and inform the detailed drainage strategy proposals and any mitigation, such as for groundwater vulnerability in source protection zones. The detailed drainage strategy will be secured within Requirement 12 of the DCO. Section 3.6 of the Drainage Strategy in Annex F of the FRA [AS-010] describes the water quality approach to demonstrate no detriment.	It is unclear where ground investigations to inform the detailed drainage strategy is in the DCO. We note Requirement 18 relates to ground conditions. The response to [RR-1178] (CCC-031) in [REP1-016] refers to the assumed rate of 1 x 10^-5 m/s as conservative (anticipated worst case). However the Councils as stated in their LIR considers this is relatively high and is unlikely to be representative of the geology locally.

ExQ1	Question to:	Question:	Applicant's Response:	The Joint Council's Response:
			Paragraph 5.4:- Please refer to response already provided to RR-1178 (CCC- 033) in [REP1-016] in relation to paragraph 5.4, for detail on QSE approach. The quick storage estimate is also discussed within the Flood Risk Assessment Part 1Rev 1 [AS-007]. Paragraph 5.6:- Please refer to response already provided to RR-1178 (CCC-034) in [REP1-016] in relation to paragraph 5.4, for discussion on a drainage hydraulic model.	CCC considers the maximum level of the QSE should be used to assume a worst-case scenario, with no infiltration, to ensure that the capacity is available at the site. It is important the latest climate change allowance is used. The Councils note the response and hydraulic model will be prepared for the BESS and Site Compound areas once design layouts are confirmed.
Q1.11.30	The Applicant			
Q1.11.31	The Applicant			

Appendix A to

Brief comments on the Transportation and Access Technical Note [REP2-041]

Sunnica Energy Farm (EN010106)

Deadline 3A **28 November 2022**

Paragraph:	Applicant's Statement:	Councils' Comments:
2.1.2	*The links have been represented on the figure as a distance of 200m or up to the next junction. Characteristics on both sides of the carriageway along the links have been used within the ES assessment beyond the 200m. However, the distance has been chosen for clarity of representation purposes on Figure 2-1, and to denote the location from where the traffic data for the purpose of the assessment has been taken.*	The Councils would like further clarification on this statement. It is assumed to mean that sensitivity of links was informed by the entirety of the link and not just the area shown on the figure?
2.1.5	*During the 26th April video conference meeting, link sensitivity was discussed and the Applicant requested that the LHAs review the link sensitivities set out in the ES and provide any comments. This request was repeated in the two July video conference meetings with the LHAs. Both LHAs confirmed their TA team are reviewing the link sensitivities, which was confirmed in the 4th October video conferencing meeting however no date was advised as to when this would be provided. The Applicant is happy to discuss any concerns that the LHAs may have regarding the classification of sensitivity and are awaiting clarification*	The Councils provided a summary email on our concerns around link sensitivity, which was provided to the Applicant on 17 October 2022; subsequently the Councils' LIR [REP1-024] also included a list of concerns around link sensitivity at ANNEX F. The Councils welcome these concerns being addressed.

Paragraph:	Applicant's Statement:	Councils' Comments:
	from the LHAs regarding links which may be required to be discussed further.	
3.1.4	*The primary concern from the LHAs was regarding the use of this factor was the reliability of using the Sizewell C (nuclear power station) project located within Suffolk, which itself was based on monitoring data from Hinkley C (nuclear power station), as a comparator, on the basis that the nature of construction of nuclear is different to solar.*	It is worth noting that Sizewell C workstream undertook a sensitivity test for a lower car share proportion to reflect monitoring at Hinkley Point, but more importantly the scale of workforce, mitigation and controls associated with the project are significantly different to the proposed scheme.
Table 3-1		Whilst the Councils recognise that a 1.5 car share has been accepted at a number of other projects, and some of these projects have been consented, there is little or no supporting monitoring evidence to show that these proportions are achieved, nor is there any context of the mitigation or management offered by those projects to achieve that 1.5 car share. The Councils are seeking appropriate monitoring, controls, reporting and enforcement to ensure that the impacts do not exceed the assessed figures. It is notable that the granted sites have not commenced so no data is available
3.1.9	*Therefore, the construction staff to vehicle ratio applied on Sunnica is consistent with the three East Anglia Offshore Wind Farms projects.*	It is recognised that the proportions are identical to these projects. However, since submission of these projects the Councils have seen monitoring from Hinkley Point and had discussions with contractors which indicate that these proportions are not always achievable, especially in rural locations.
3.1.10	*Many of the schemes set out above reference the use of mini buses to transport staff to the sites to reduce the number of vehicles travelling to/from the sites. It is anticipated that during the construction of the Sunnica Energy Farm that mini-buses would also be used to reduce the number of vehicles travelling to/from the site as set out in section 7 of the Framework Construction Traffic Management Plan and Travel Plan [AS-300, AS-301].*	Without a firm commitment to provide a mini-bus, it should not form part of considerations of impacts.

Paragraph:	Applicant's Statement:	Councils' Comments:
3.1.12	*An average vehicle occupancy of 1.3 is considered to be the lower than a reasonable worst-case scenario, as none of the DCO applications used an occupancy factor as low as this*	The Councils do not agree with this statement, as it is not based on evidence.
3.1.13	*It is therefore considered that, based on the information provided above, the sensitivity test below is worse-than reasonable and the core assessment undertaken as part of the ES remains a reasonable worse-case scenario.*	The Councils do not agree with this statement as we do not consider the 1.33 car share as a worst-case scenario.
Table 3-3		Whilst it is recognised that Table 3-3 indicate that there would be very limited change in the effect. This is based on the link sensitivity used within the assessment, which the Councils have not agreed to these sensitivities. It also has not informed any updated modelling assumptions including the Councils' concerns around the spreading of the construction traffic across the assessed peak hour. It would also be beneficial if the proportional changes were provided alongside this table to check for any uncertainty in the conclusions.
3.1.16	*This would also be temporary, occurring for a short amount of time, for one month, at the peak of the construction phase only. This is therefore not considered a significant adverse effect.*	The Councils are concerned about the dismissal of impacts, whilst we recognise that the relative change is limited it highlights the limitations of the assessment method that one impact is slight and the other moderate.
3.1.17	*The use of a construction parameter of 1.5 vehicle occupancy has been demonstrated to be robust, and therefore the assessment within the ES is valid. Furthermore, the sensitivity test presented for a 1.3 vehicle occupancy, an overly pessimistic assumption, shows that it would not result in additional significant effects. This demonstrates that there is significant confidence in the conclusions drawn on construction traffic impact.*	The Councils disagree that it has been evidenced to be robust, as there is no monitoring data that shows this from similar projects. The Councils disagree that that the 1.3 car share ratio is overly pessimistic for the same reasons. Without agreeing the assessment method, the link sensitivity and being provided with the proportional changes in traffic it is impossible for the Council to conclude that this would not change the effect.
3.1.18	*Therefore, the construction staff vehicle forecast is considered to be robust and fit for purpose.*	The Councils consider that a commitment to appropriate monitoring, controls, enforcement and reporting would ensure that this is the case.

Paragraph:	Applicant's Statement:	Councils' Comments:
3.1.24	*The 30km staff travel distance is consistent with the assumptions used for the Socio-economic Assessment in the Chapter 12 of the ES. The centre point taken is in between the two sites and is illustrated on the figure below.*	The Councils do not agree to Socioeconomic assessment of workforce origins and therefore the distribution of vehicle movements.
Table 4-3 to 4-5		As the link sensitivities used to draw conclusions at Table 4-3 to Table 4-5 are not agreed, as set out in our LIR [REP1-024], the conclusion on the impacts is not agreed. SCC would appreciate the survey data being shared with the LHAs.
Figure 4-4 and 4.1.16	*The results of the modelling indicate the junction is forecast to operate with a maximum Ratio to Flow (RFC) capacity of 0.56 on the A11 Northbound OffSlip. Thus, the junction will operate well within capacity (less than 0.85 design capacity) during the AM development peak hour.*	These conclusions are based on an even split of development traffic across the hour, which is unlikely given the shift patterns. It is considered more likely that staff would arrive in the 30 to 15 minutes before the shift begins.
4.1.19	*These working hours are secured in the CEMP [AS-302] within section 2.3*	The working hours are set out at paragraph 2.3.1 of [AS-302], but without monitoring, enforcement and reporting, the Council are concerned that different working hours could occur.
Table 4-8 and 4.1.20	*During the survey period, the Saturday traffic flows are lower than the average weekday traffic flows Therefore, the use of the average Monday to Friday traffic flows is considered to be robust for the purposes of the Transport and Access assessment within the ES [APP-045] and the Transport Assessment[APP-117].*	The traffic flows are evidenced to be lower on the Saturday, but this implies that the proportional increase will be greater and therefore the magnitude of effect will be greater than the assessed hours.
5.1.1	During the 4th October video conferencing meeting with the LHAs a question was asked to clarify the definition of a HGV as over 7.5 tonnes or 3.5 tonnes. It was confirmed that it is 7.5 tonnes, and no further clarifications were sought from the LHAs.	The LHA are grateful that the definition of HGV is confirmed to be those greater than 7.5 tonnes. For completeness we would ask that this definition is included in the OCTMP & TP. There appears to be an assumption in the assessment that no vehicles <7.5 tonnes other than minibuses will access any other location than the main site car parks. For clarity the applicant is asked to confirm this is the case and that all car and LGV movements have been considered for each link in the traffic assessment.

Paragraph:	Applicant's Statement:	Councils' Comments:
Figure 5-1		The LHA still notes that there is a general reduction of HGV movements through the day as shown in Figure 5-1 it is agreed that this is not significant provided that the daily HGV movements are robustly controlled on the LHA network. As discussed elsewhere the due to the limited information available regarding quantities of materials required for the project the LHA still retains concerns regarding peaks in HGVs movements resulting from activities, such as large concrete pours.
5.1.2	*Suffolk Highway Authority raised a question regarding the assumption of an even distribution of HGVs throughout a construction day. Based on professional experience, this approach is both commonly taken and a reasonable assumption. Furthermore, the use of an even distribution to identify a peak hourly flow of HGVs is considered robust as it excludes network peak hours.*	Without evidence, this assumption is considered to include uncertainty. SCCs views are based on it experience on local road and development sites which do indicate a slight bias towards deliveries being focussed in the morning / early pm particularly for the larger planned activities. However, provided that there are robust controls on daily HGV movements this should not be a significant issue.
5.1.7	The Sizewell C Power Station distribution identifies a peak inbound movement of 20 HGVs compared to 16 based on the Sunnica distribution and the Sizewell C Power Station identifies a peak outbound movement of 18 HGVs compared to the Sunnica distribution. When comparing the twoway HGV traffic flows, the Sizewell C Power Station distribution identifies a peak two-way movement of 35 HGVs whereas the Sunnica distribution identifies a peak two-way movement of 31 HGVs.	The Council welcomes the additional assessment and considers that the alternative profile would not materially affect conclusions.
6.1.3	*External mini-bus trips have been classified as those that cannot be made using the internal routes without using the public highway, which also includes crossing the public highway at the temporary traffic signals along the cable corridor. Therefore, there is the potential for a greater number of mini-buses to use internal routes to travel along the cable corridor and the temporary traffic signals to cross the public highway in a safe and controlled manner. This would further reduce the external number of mini-bus movements discussed above. However, to provide a*	The absence of information regarding the internal site layout and the mini-buses is of concern to the Councils as they are unable to form a full picture of the cumulative traffic movements associated with the project, for example if mini-bus movements on Elms Road travel against arriving shift workers or HGVs. While there is no objection in principle to haul roads and mini-bus routes crossing highways with suitable traffic management, the LHAs would seek approval

Paragraph:	Applicant's Statement:	Councils' Comments:
	robust forecast of external mini-bus trips, this has not been included and it would be at the contractor's discretion to assess if this can be achieved in a safe and controlled manner.	of such arrangements as part of the CTMP (as per requirement 16). Indeed, it would support measures to use haul roads to internalise HGV movements. The duration that such temporary traffic management is present may exceed that shown in the programme for the discrete project elements accessed from specific locations (for example accesses D and H).
6.1.4	*The mini-bus forecast is based on a 14-seater vehicle, however, this capacity could be increased depending on contractor arrangements, which would reduce the number of trips. Therefore, to provide a robust assessment, it is considered reasonable to assume a 14-seater mini-bus.*	Further clarity is sought on the estimation of mini-bus numbers and movements. Are the 59 no. minibuses spread across the project or focussed at either Sunnica West or Sunnica East? The peak construction in month 9 of 1,393 staff (APP2-022 3.7.29) would, if all used minibuses for transport, require 100 minibuses at full capacity. It would be beneficial if the combination of minibuses and HGVs during the 0700 to 0800 peak hour could be shown by the Applicant to be a minimal impact.
7.1.5	*Both the construction staff car parks have been designed to accommodate the peak number of construction staff vehicles forecast in the Transport and Access assessment within the ES [APP-045], which has been shown within Section 2 of this Technical Note to be robust. The size of the construction staff car park will be reduced as the construction programme progresses. The final CTMP and TP, prepared by the contractor, will outline the final layout of the two centralised construction staff car parks.*	The Councils are concerned about the 474 right turn movements into access C, which will be affected by the 41 southbound movements and traffic signal control. Which may cause queues on Elms Road for a short period as shifts arrive. The area and surface of the car park is not known to the Councils, and so we cannot comment on how parking bays will be laid out to ensure the necessary capacity is obtained, although the Applicant advises this will be another matter addressed in the final CTMP & TP.
7.1.8	*As identified in the F-CEMP, a Community Liaison Group will be set up prior to construction and a Community Liaison Officer (CLO) will be appointed to engage with local communities during construction. Contact details will also be available on the display board at the site entrance should anyone wish to make contract.*	The Councils would seek clarification on whether there will be a single Community Liaison Officer for the project or if multiple contractors are employed a number of Liaison Officers. We would also query whether the Officer(s) will be directly responsible to the Applicant.

Paragraph:	Applicant's Statement:	Councils' Comments:
		It would also be advisable to make the contact details more widely available than just a display board outside the site entrance (e.g. website or social media), which may be difficult to obtain.
7.1.10	*During the 4th October video conferencing meeting with the LHAs a question was raised regarding potential visitors to the site during the construction period. The Applicant had provided the forecast of construction staff during the 24-month construction period. The forecast includes all person expected to be on site during the construction period. However, if there are additional visitors to the site during the construction period, such as site inspections or management visits, these are expected to occur outside of construction and network peaks, involve very few vehicles and have a negligible transport impact. On-site parking would be provided for visitors within the construction staff car parking area.*	As no information has been provided on the potential number of visitors other than it will be very few vehicles the Councils consider that access to the site should be monitored (and reported) between shifts to demonstrate that this is indeed the case and no unassessed impact occur due to such movements.
8.1.2	*It is noted that the scheme peak daily staff numbers from month 9 had been used for the ES assessment due to the peak Sunnica East daily staff numbers and peak Sunnica West daily staff numbers not occurring during the same month and the Scheme peak.*	The Councils would continue to query the potential for the two peaks to crossover and result in a greater traffic impact as set out in our LIR [REP1-024]. This reflects the need for adequate controls.
8.1.4	*It is also noted in Section 5.4 of the TA [APP-117] that the grid connection corridor is forecast to require a maximum of five staff vehicles (10 movements) per day during the seven-month Grid Connection Route A and B construction window. Given the location of the Grid Connection Route A and B will change as the construction is progressed, the staff associated with the construction of this element will go to the most appropriate Grid Connection Route A and B site access. There will be no staff vehicles in the network peak hours and the increase in traffic flow as a result of the staff vehicles is not expected to impact the operation of the local junctions due to the forecast low number of staff vehicles. For these reasons, the staff vehicles associated*	It is noted that grid connection workers (max 5) will travel on the LHA network and have not been assessed.

Paragraph:	Applicant's Statement:	Councils' Comments:
	with the grid connection corridors are not included within the distribution and assignment of the construction staff vehicles for the Scheme.	
9.1.3	*A further review has been undertaken on the PIC data for the A14 Junction 37, focusing on the incidents that were identified to have occurred whilst undertaking part of the 'Boomerang' movement. These movements include the right turn movement from the A14 westbound off slip and the right turn movement from the A142 to the A14 eastbound on slip.*	The Councils have reviewed PIC data for the A14/A142 Junction at Newmarket. Our conclusions are slightly different identifying: 4 collisions at the turn from the A142 to the A14 slip onto A14 westbound (17234739, 19811657,19876580, 20970797). A common factor was A142 SB turning right into the A14 slip on traffic conflicting with that travelling north on the A142. In two cases these involved 2 wheel vehicles. 3 collisions where the slip off from the A14 westbound joins the A142 (182849999, 18318564,20992319). All involved northbound vehicles on the A142, one impacting with a vehicle exiting the slip road, the other two being when vehicles stopped and were hit from behind or overtaken, the overtaking vehicle hitting a vehicle leaving the slip road. While such data is useful showing some general trends it may not represent the full picture being affected by the reduced traffic during the COVID pandemic and the long duration roadworks at this junction (2021/2).
9.1.6	*Consideration is provided below of the proposed part signalisation of the A14 Junction 37 as part of the Hatchfield Farm application (planning application reference: C/13/0408/OUT), with an insert of the scheme provided in Figure 9-1. The outline planning application for the part signalisation of the A14 Junction 37 was approved in March 2020. A date is not specified in the planning permission of when these highway improvement works will be undertaken*	SCC can confirm that it has received the design for the improvements to the A14/A142 junction as mitigation for the Hatchfield Farm development and is working with National Highways to technically accept the design and secure roadspace for delivery. At this time no data has been agreed for commencement. Due to the uncertainties regarding the road safety at this junction in terms of data, impacts and delivery of third party mitigation the Councils propose that the FCTMP&TP includes monitoring of road safety at the junction and a commitment

Paragraph:	Applicant's Statement:	Councils' Comments:
		to mitigation in the event that the Hatchfield Farm improvement scheme does not proceed or is significantly delayed and there is an increase in collisions during the Sunnica construction phase.
11.1.4	*A summary of the information provided on the site access plans drawings will be include and be provided in the next iteration of the Framework Construction Traffic Management Plan and Travel Plan that the Applicant proposes to submit at Deadline 3*	The Councild welcome the provision of additional information. However, in the Councils' opinion the information requested is no greater than is usually asked for planning applications nor is it greater than that provided by other NSIP applicants. The key matter that the LHAs wish to address is that the accesses designs are safe and can be delivered without foreseeable constraints being identified following consent of this application. The Councils have requested that the access layout, including ant traffic management and visibility splays are provided for those that will remain in use for the operational phase. No data has been provided to quantify the likely use during the operational phase but some intensification is likely, particularly East Site Access A the primary site accesses and entrance to sub stations.
Appendix B		Notwithstanding the issue with spreading the traffic impacts across the peak hour, as a drawing showing the junction geometries has not been provided; these cannot be verified, which means that the junction model cannot be approved. There is some concern for the use of a two lane approach to the junction and that both lanes have identical measurements. The provision of the survey data with traffic flow diagrams would also have been beneficial for reviewing the junction model outputs.