ID Number: 20031377

Sunnica Energy Farm EN010106

Suffolk County Council Response to the Updated Framework Construction Traffic Management Plan and Travel Plan (FCTMP&TP) (APP3-014) Deadline 4

16 December 2022

Introduction

It is proposed in 1.2.1 that the FCTMP&TP is discharged by the highway authorities. This is welcomed by SCC, although the Council would also be content if references were made to consultation with the local planning authority. The Council would be content to accept the CTMP and TP as a single or two separate documents.

Construction Movements

With respect to AILs, the length is stated but not the weight / maximum axle weight nor the width. The Council would find this information helpful when responding to the adequacy of the AIL route.

In previous responses to the ExA written questions (5.1.1 in [REP3A-049]) the Council has requested that the term HGV is added as a definition in the FCTMP&TP, so the Applicant's use of 'HGV' refers to all vehicles exceeding 7.5 tonnes in weight.

Table 2-1 indicates that the peak number of HGV movements is in month two with 57 deliveries (114 movements). This appears to contradict 2.3.6 which states that '*the peak HGV deliveries are forecast to occur in month three and four with 43 HGV deliveries per day (86 movements*)'.

Local Authority Freight Management Plans

Table 3-1 'SCC Lorry Routes' incorrectly includes the B1085 as a local access route. This road is in Cambridgeshire. However, the C610 Newmarket Road from Red Lodge to Worlington is a local access route. Further information on the Suffolk County Council Recommended Lorry Route Network is available on the SCC website: https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk/recommended-lorry-route-network-map/

Site Access, Crane and AIL Routes

The site accesses referred to in paragraph 4.1.9 includes access C and E, which will be the main entrance to the substation sites in Sunnica East. The Applicant, in the Council's view, has not provided sufficient evidence that there will be no intensification of use at these locations during the operational phase. SCC has also raised questions as to the meaning of 'maintenance' and hence the implications in terms of vehicle movements generated. The Council understands that the applicant will propose a mechanism for monitoring maintenance operations and awaits these proposals with interest. This also applies to paragraph 5.3.11 regarding access to the Grid Connections.

In 4.1.11 the Applicant states that for Sunnica East site accesses E and F '*HGV vehicles routes are proposed to use Isleham Road to/from the A11 with the inbound and outbound routes shown in Figure 6 and Figure 7 respectively'.* Figures 6 and 7 show the route using the B1102 Freckenham Road Mildenhall Road and C603 Freckenham Road, not the C608 Isleham Road.

SCC has responded to the Applicant with a number of questions regarding the traffic management proposed in paragraphs 5.2.4 and 6.1.1. The main areas of concern are:

- Lack of details for the temporary traffic signals i.e. 2, 3 or 4-way signals
- Proximity of multiple sets of traffic signals in use at the same time not complying with guidance
- Narrow carriageway widths for vehicles to pass and queue at signal heads.

While the Applicant is correct that Sunnica site access A on Elms Road is 400m from the A11 off-slip most construction traffic uses site access C, which is around 1,150m from the A11 slip road. SCC has already commented on the appropriateness of assuming a 4.8m carriageway width is suitable for passing vehicles in our LIR (REP1-024) 13.75.

The Council notes that the Applicant has used an experienced contractor that has identified the maximum size of AIL vehicles accessing the site, but no similar experienced contractor appears to have been engaged to review the routes to the site. In other DCOs, notably EA1(N) this information was provided to the examination (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). We have referred to concerns raised about the movement of AILs and suitable routes in our LIR 13.55 to 13.58 (REP1-024). Also as noted in the LIR (REP1-024) the AIL wheel track (blue for AILs) passes over the central island at the junction of the B1102 The Street / Mildenhall Road (Plate 27) so more than trimming of branches (5.6.11) may be required at this location.

Comments have also been made regarding movements of AILs on the B1103 Swan Lane specifically the oversailing loads being very close to the White Swan Public House. It is noted that in paragraph 5.8.1, the Applicant acknowledges that a 1000 tonne crane will have to traverse parts of the footway. This is a concern to the LHA as it is not known what services are beneath the footway or how quickly any damage to these or the footway will be rectified. That this occurs raises questions about the suitability of this route.

With regards to the road safety audit undertaken at access I (C576 Newmarket Road) described in paragraphs 5.11.3 to 5.11.8, SCC does not accept that the recommendation for additional temporary signing alone is sufficient to address the Council's concerns regarding the safety of this access, as notably the visibility towards the A11 is only 90m. The Applicant has not yet shared the designer's response to the safety audit with SCC nor updated the transport assessment with the speed data for this location (although it has provided this data to SCC).

Traffic Management Proposals

SCC notes the implementation of temporary traffic management in paragraph 6.1.1 to reduce the removal of vegetation to provide safe visibility at accesses. Concerns remain regarding the provision of safe access during the operational phase after the removal of the temporary traffic management measures, especially as limited information has been provided on use during the operational phase and it is not possible for the authority to understand what intensification of use will occur.

SCC is not aware that speed enforcement follows any 'tradition', only that the powers of enforcement lie with Suffolk Constabulary (for Suffolk). The authority notes the high demands on police resources and the likelihood that enforcement of temporary speed limits is unlikely to be a high priority. We would also question whether shorter lengths of temporary speed limits would be a benefit in terms of compliance. The use of temporary traffic signals would reduce most vehicle's speeds except on occasion when drivers attempt to pass through before the signals change.

If it is not possible (6.3.2) for emergency vehicles, pedestrians, cyclists or equestrians to pass through road closures, the Applicant must provide safe diversion routes.

SCC welcomes the Applicant committing to agree the layout and signage of temporary traffic management with the LHA (6.4.2).

Management (Controls, Monitoring, Reporting and Enforcement)

Will details of the DMS, as outlined in paragraphs 7.2.2 to 7.2.4, be provided in the final CTMP submitted to the LHA for approval? The proposals in paragraph 7.2.3 refer to limits on HGV deliveries, but do not state what these are, and so have limited value. The LHA considers that details of these controls on the number of HGV movements on the local highway network are necessary to ensure that these do not exceed those assessed in the Environmental Statement and Transport Assessment.

While not accepting that the impacts of HGV movements are minimal, as argued by the Applicant in paragraph 7.2.7, as disruptive traffic management is needed for large vehicles to negotiate the C610 Newmarket Road / B1102 The Street junction, SCC would accept that with suitable temporary traffic management these impacts would not be severe.

Paragraph 7.2.6 states that HGV vehicles exiting the sites in the evening peak (1700-1800) will be restricted, not arrivals. This is not consistent with paragraph 7.2.8 which states that this includes departures. It would be helpful if these two paragraphs could be consistent.

In paragraph 7.4.7, the Applicant commits to reporting data obtained from monitoring HGVs, LGVs and workers. The monitoring system together with the reporting of this information should be outlined in this document and the full details included in the final management plan submitted for approval. With respect to road safety incidents, SCC welcomes the commitment by the Applicant in paragraph 7.2.11 to raise and discuss these with the relevant LHA; but again would expect this process to be detailed in the management plans submitted for approval prior to the commencement of the project. The roles of the Transport / Travel Plan co-ordinator listed in paragraphs 7.3.2 do not include reporting of the monitoring data to interested parties nor enforcement, as would be required by paragraph 7.4.7.

It is unclear in paragraph 7.2.12 whether control of HGV emissions will be defined, enforced and reported to the local authorities. SCC's view is that this should be monitored, reported and enforced through the CTMP.

The communications strategy (paragraph 7.2.13) should also include the measures taken to inform relevant local authorities and local communities of the project and activities.

The methodology for and thresholds applied to the condition surveys must be agreed with the LHA before they are undertaken.

In SCC's opinion, the indicative layout of the site accesses should be to a level where the LHAs can assess whether they are safe, feasible and deliverable.

For movement of AILs (7.2.24), the Applicant is reminded of the necessity for early liaison with the relevant highway authority's structures team to ensure that all necessary surveys, assessments and where relevant strengthening of structures can be completed before movement of such loads are required.

SCC welcomes the commitment to include a cap on staff vehicle numbers in paragraph 7.2.25. However, for clarity we would expect these numbers, presumably based on those assessed in the Environmental Statement and Transport Assessment, to be included in the FCTMP&TP that will form a certified document in schedule 10. There is an inconsistency between paragraph 7.2.27 which states a car share of greater than 1.5 and paragraph 7.2.38 which indicates a car share of 1.3 which is the cap proposed by the Applicant. SCC would prefer the cap to remain at 1.5 to incentivise good travel behaviour noting that the Elms Road car park appears to have 600 spaces, less than the 640 staff vehicles generated for Sunnica East with a car occupancy of 1.3 (7.2.38). It is unclear if the Elms Road car park would need to be expanded and if so whether this is factored into the calculated construction traffic figures. The council also wishes to understand why the caps are for the development peak hour only and not all day (i.e. no movements), given the previous assurances around shift patterns removing the need for worker movements during the interpeak (0700 to 1900) period.

While the Applicant's desire in paragraph 7.2.26 to reduce the potential transport impacts is welcome, SCC has reservations that the development will 'maximise' the number of staff who lift share or find alternative ways of traveling to the site. For example, in paragraph 7.2.36 there remains no commitment to provide a minibus service, only to 'investigate' the potential. The concern is, as reflected in our comments on the origin of the workforce, that the assumptions made in the assessments maybe incorrect with concentrations of workers in rental accommodation located in communities such as Newmarket, Red Lodge and Mildenhall. SCC would welcome the Applicant reviewing the reduction measures (in 7.2.25) prior to submitting the final CTMP&TP for approval. SCC notes that in 7.2.30 there is no control on the routeing of staff movements beyond a general 'direction', and in any case, this is unlikely to be effective so that workers may travel through local communities. Strengthening of sustainable travel behaviour would also support the best practices listed in Table 30-1 of the Construction Environmental Management Plan (REP3-016) to reduce carbon.

The Applicant's mitigation to avoid worker trip impacts in network peak hours relies entirely on the timing of the shift patterns for all workers and visitors as stated in paragraph 7.2.31. The Council remains concerned as to how these working patterns are controlled, monitored, reported and enforced to ensure that this mitigation is delivered.

The Applicant sets out in paragraph 7.4.7 a commitment to report the following information. Additional information considered necessary by SCC, generally as included in our LIR (REP1-024) 13.120, 13.122, 13.123 and 13.128 to be reported is added in italics.

Common to freight and worker movements

- Progress of the project against specific gateways;
- Details of non-compliance with routing or speed limits;
- Near misses or safety related incidents;
- *The relevant authority should be made aware of any breaches of the CTMP or TP, as soon as reasonably possible, this should be via a standard reporting mechanism (8.2.5).*

Freight management

- Freight movement to/from the site (*routeing, timing and total daily numbers on specific roads or routes*);
- Freight compliance with appropriate exhaust emissions (Euro VI);
- Transport of AILs to/from the site (*routing, timing, classification*);

Travel Plan

- LGV* movements to/from the site (*clarity is required whether LGVs will be included within the car share ratios, mini-buses included in 'LGV numbers'*).
- Staff movement to/from the site, based on total numbers of vehicles and compliance with shift patterns (*including movements outside shift times and car share ratio*);
- Information on complaints received on transport related issues including parking
- *commitment to report the car park survey outputs to the relevant authorities.*

SCC Response to the updated Framework Construction Traffic Management Plan and Travel Plan (F CTMP&TP) REV 3 (APP3A-005)

4.11 SCC wishes to understand whether the rights to use grid connection access points includes reinstatement of any temporary traffic management.

5.2.9 SCC agrees in principle to the applicant providing passing bays on Elms Road subject to the resolution of some matters of detail, for example, layout of the passing area closest to the A11 slip road.

5.2.11 SCC anticipates that in time the Applicant will make the surveys available for inspection, for example in an updated Transport Assessment although the authority recognises that when requested the Applicant has shared specific survey data with SCC.

5.9.4 The level of data should reflect what is necessary to confirm that the proposals are safe, feasible and deliverable, not the currently available data.

5.9.5 SCC still has a number of matters to resolve with the applicant.

5.9.6 f. SCC is slightly mystified by the comments made that access SE-G will only be used by LGVs as unless these are solely mini-buses this contradicts the commitment made by the Applicant that all LGVs have to use the site car parks. SCC is also seeking evidence from the applicant that demonstrates here will not be an intensification of use of SE-J.

5.9.6 g. SCC is not convinced that the vegetation for the site accesses is wholly correct for the construction phase, specifically for forward visibility exiting the site and during the operational phase when the temporary traffic management will have been removed.

REP3-019 Sunnica Response to LIR

Chapter 13 Transport p138-177

1g: As the Applicant has only recently approached the LHA for information regarding the highway boundary we consider our comment remains valid.

1h and 1r The LHA have responded to the Applicant with a number of questions and requests for additional details with regard to the temporary traffic measures proposed.

1i The applicant has provided additional information during the examination although some deficiencies remain. Specifically, only spot road widths are shown on plans which do not enable the LHA to assess whether the widths are suitable for the access design and / or temporary traffic management. A number of drawings have been provided stating that they are based on topographic surveys rather than ordnance surveys and SCC has asked the Applicant to confirm that is the case and that the topographical information is made available. An example is the layout for access F where the Applicant has shown a width of 6m for the internal track based on a line which from google maps is clearly another feature and not the edge of the existing track.

1k, 1l, 1m and 1u The LHA's seek a written commitment on certified documents such drawings or management plans that accesses will have a bound surface adjacent to the public highway with suitable drainage to prevent water or debris flowing onto the highway and any gates are located an appropriate distance from the highway to avoid the vehicle being held or stopped on the public highway awaiting access. These commitments are considered necessary at this stage to prevent disagreement on some key safety matters when the Applicant seeks to discharge requirements.

1s The LHA does not consider that the Applicant has provided sufficient evidence that there will not be an intensification of use at the accesses retained during the operational phase, particularly those used for entry to the substation sites. Please see our general comments regarding the definition and scope of 'maintenance'.

1t While SCC is close to agreement on mitigation for HGV movements during the construction phase on Elms Road, concerns remain about HGVs using the C603 Freckenham Road and C608 Isleham Road, notwithstanding the lack of clarity regarding which road is being used. Not all junctions (e.g. B1102 The Street / C608 Isleham Road) have been assessed by swept path analysis.

1n SCC continues to have concerns that the access tracks will only be wide enough for single large vehicle movements and if conflicts occur there will not be space to manoeuvre incoming vehicles past outgoing. Whilst the applicant has stated that measures will be put in place to prevent this it is unclear what these will be and whether they will be effective.

1w SCC usually requires a stage 1 road safety audit where there is likely to be an impact on road safety to be undertaken once an outline design is available. In SCC's opinion, this should include all accesses that are to be retained for use within the operational phase and anywhere the authority has raised concerns about safety (e.g. Access I). This is common practice for other developments including EA1(N), EA2 and Sizewell C.

13.46 SCC notes that the modelling assessing capacity relies on the traffic distribution assumed by the Applicant, notably the workers' shift pattern, and that no evidence has been provided regarding the actual distributions from sites that have been or are in the process of construction. Therefore, it is essential that the shift timings are secured within the certified documents with robust monitoring, reporting and enforcement. SCC remains concerned that the workers will not arrive over the periods of 0600-0700 and 1800-1900 but will be concentrated in a short duration before and after the shift.

13.50 The information provided in the application is not of sufficient detail to allow the authority to examine the estimated HGV movements. Presumably, more information was made available to the contractor.

13.55 to 13.59 The Applicant appears to rely solely on the past movement of a transformer from Ipswich to Burwell (noting this is no longer an option for a substation site). The Applicant has not confirmed the maximum weight of AIL, only that it complies with the STGO3 classification. Thus, it is uncertain if the AILs can be moved wholly on the SRN or need to divert onto the local highway network, for example, to avoid the restrictions on A14 Hillhouse Viaduct, Stowmarket. The public highway, including structures, is subject to change and deterioration. A route used in the past may have restrictions placed on it since then. An example is the A1088 where the rapid deterioration of a bridge has necessitated an emergency weight limit of 7.5 tonnes to be applied. SCC considers it reasonable for the Applicant to engage with a competent haulier to identify a feasible AIL route and provide this information during the examination. Recent DCOs (SZC, EA1(N)) have included such information.

13.60 SCC understands that the Applicant is seeking highway boundary information from the highway authorities.

13.61 to 13.63 SCC maintains its position that the information provided within the original application was insufficient and lacking in key details. We welcome the efforts made by the Applicant to work with the LHA to resolve the matter and to provide enough detail to enable the authorities to assess if the accesses are safe, feasible and deliverable. SCC has requested additional information and raised a number of concerns regarding the temporary traffic management proposed by the Applicant.

13.64 SCC disagrees that stage 1 road safety audits are not necessary. As a minimum, the authority would expect the permanent layout and any temporary layout where there are significant road safety concerns (e.g. departures from design standards) to be audited. This is no more onerous than what is expected for most development.

13.72 The Applicant's proposals for a departure from the standard for the visibility at Sunnica East access I are discussed separately in this response.

13.74 to 13.79 SCC is considering the Applicant's proposal to provide passing bays on Elms Road. In principle, this would be acceptable subject to agreement of a number of details.

13.105 SCC remains unconvinced that the measures proposed will prevent two vehicles meeting at the site access on some occasions.

13.112 to 13.113 SCC does not consider that the applicant has demonstrated there will not be an intensification of the use of some accesses during the operational phase. Of particular concern are accesses C and E which serve the substation sites.

13.117 to 13.118 SCC welcomes the Applicant's commitment to collect and assess collision data during the construction phase.

13.139 to 13.143 SCC still considers it necessary for the applicant to review AIL routes from the point of origin to the destination, not just from the nearest strategic road. See also 13.55 to 13.59.

Appendix D (p214 to 239)

1.3 to 1.4 SCC thanks the Applicant for undertaking additional surveys. However, concerns remain that suitable safe diversion routes must be provided for NMUs displaced from closed PRoW, particularly as many of the local roads will be used for construction traffic and have little if any pedestrian or cycling facilities.

1.5 Part of the point being made by the authorities is that workers from outside the area may use locally rented accommodation in areas such as Mildenhall, Newmarket and Red Lodge.

1.6 The Applicant's clarification of the Saturday shift patterns and hence peak development traffic has, subject to suitable controls being in place to ensure this is the case, removed SCC's concerns on this matter.

1.7 The existence of a warranty is not the same as quantifying the likely requirement for replacement or major maintenance of either batteries or PV modules. SCC would seek an explanation from the Applicant of what they consider the threshold between material and non-material new or different effects would be. For site accesses would it be the maximum daily number of vehicles assumed for the construction phase?

1.8 to 1.9 The external mini-bus trips are discussed in Section 6 of the Transportation Technical Note [REP2-041] submitted at Deadline 2. The external mini-bus trips represent a separate effect, in a separate time period, which will be substantially lower than the impact assessed with the Transport and Access chapter of the ES [APP-045]. The volume of trips, i.e. a maximum of 59 trips spread across multiple routes, remains substantially lower than the peak hour construction flows. Furthermore, these movements will occur at an off-peak time, when traffic volumes are significantly lower than network peaks. Therefore, the forecast external mini-bus movements are not expected to have a significant impact on the operation of local junctions given the low number of forecast vehicles, the multiple locations travelling to/from and the time the mini-buses will be on the local highway network.

SCC notes that the majority of the minibus trips occur at the beginning of the shifts i.e. 0700 and 1900. These movements are likely to be concentrated at these times which are proximal to the network and development peaks. Nor has the applicant evidenced that the forecast number of movements is a realistic maximum based on real life data, for example, that the vehicles are occupied at or close to capacity

1.15 Whilst SCC is content that subject to acceptable caps, monitoring, reporting and enforcement that a car share ratio of 1.5 is acceptable it does not consider that one of 1.3 is. The latter does not show a willingness or aspiration to maximise sustainable transport options for this project nor reflect comments made in 2.4.6 CEMP (REP3A-005). Whilst a 1.3 car share occupancy has been tested through junction modelling at selected junctions it is not clear if the ES has been updated in this respect.

In 1.24 the Applicant states that link sensitivity has been agreed, which is incorrect. SCC has not agreed to the proposed criteria although we consider discussions on this matter to have been concluded – see our response to Appendix A Technical Note Transport and Access.

1.54 SCC would request that the definition of HGVs as >7.5 tonnes be included in the management plans.

1.61 – 1.62 SCC would expect that the commitment to no worker or LGV trips outside 0600-0700 and 1900-200 is included as a control with suitable monitoring and reporting undertaken during the construction phase. The Applicant has indicated in 1.86 to 1.87 that there will be trips outside the peak development (shift change) hours.

1.76 to 1.77 SCC considers that the monitoring shall be provided at mutually agreed regular intervals and not on request. This appears to be the Applicant's view and we look forward to changes to the FCTMP&TP to confirm this. Breaches should be reported to the LHA and LPA after an initial investigation. This is no more onerous that accepted in the EA1(N) OCTMP.

1.83 – 1.84 '*The Applicant defines a Light Goods Vehicle (LGV) as a vehicle that are less than 7.5 tonnes. The only LGVs that are anticipated to travel to / from the site will be the construction staff vehicles'.*

For clarity could the Applicant confirm that this means that LGVs will only travel to and from the car parks at the main site accesses (i.e. Sunnica East access C) and only between 0600-0700 and 1900-2000.

1.86-1.87 *'There may be a small number of worker trips to the site outside of these hours, for example, visits by management personnel to observe progress. However, any such visits will be small scale, occasional and infrequent, and all staff employed on the site will be subject to the working hours set out in the approved CEMP'.*

How will these trips be monitored and disaggregated from workers' trips? What provision has been made for parking for these visitors? Will any of these trips occur in the network peaks?

The corrective action proposed does not appear to the authority as robust when compared to recent examples (e.g. EA1(N)) https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf

154 If the breach is found to be material the following three stage process will be followed:
• Stage One – the highway authority confirms a breach and requests TCo to review the data and concerns. The highway authority and the TCo would then agree the extent of the breach of controls and agree action. This is likely to be a contractor warning at this stage;
• Stage Two – If a further material breach is identified the contractor would be given a further warning and required to produce an action plan to outline how the issue would be rectified and any additional mitigation measures proposed; and
• Stage Three – Should further breaches still occur the contractor would be required to remove the offender from the site and the contractor/ supplier would receive a formal warning. Any continued breaches by individuals of the supplier/ contractor may be dealt with by the formal dispute procedures of the contract.

1.92 The point SCC is making is that limited weight can be given to the aspiration to provide mini-bus transport as an alternative to car travel and hence the sustainability credentials of the travel plan. This is also the case with the Applicant's weakening of the car share ratio. While we appreciate the remote location makes alternatives to car travel difficult this does not remove the obligation of the Applicant to maximise any opportunities for more sustainable travel options (as EN-1 5.13.4).

Appendix A Technical Note Transport and Access

Appendix A of [REP3-019] '*Applicant's Response to the Joint Local Impact Report'* forms a Technical Note responding to comments made on link sensitivity within the Transport and Access Chapter of the Environmental Statement. The technical note focuses on the Councils' comments on link sensitivity within our Local Impact Report [REP1-024], and the Applicant's position.
In response to paragraph 3.1.2 of the appendix, for posterity, the Council does not fully agree with the overall methodology; however, in order to be helpful and move the assessment forward, have tried to specify our issues at a local level i.e. specific to each link and whether our concerns are material to the overall conclusions of the assessment or not.

With regards to paragraph 3.1.3 of the appendix, it is considered that the level of operation of the on-slips has not been evidenced within the report, nor is it considered the method for classification a reasonable approach; however, it is recognised that assuming relevant controls, reporting and enforcement is agreed that the impacts at this location on highway capacity are unlikely to be significant as they are 'off-peak'. We have made separate comments on the CTMP&TP in our Deadline 4 response, which require addressing for this to be determined.
It would have been helpful had Table 3.1 contained the proportional and numerical changes that inform the magnitude of effects, so that any locations where a change that is near to a threshold could be readily identified. This is particularly important given some confusion of the reported numbers within the Environmental Statement [APP-045], as per our comments within our LIR [REP1-024]

In section 4 of the Appendix, the Applicant undertakes a review of the development impacts based on the recommended sensitivities from Suffolk County Council. The Council recognises that the Applicant is not agreeing to these sensitivities; however, we appreciate the effort made in trying to address some of our concerns. It is, however, worth bearing in mind that the impacts are a result of a number of elements that are not currently agreed by the Council:

- Workforce origins.
- The very specific short-term impacts of large numbers of workforce vehicles arriving in 15-minute periods.
- Shift patterns and vehicle numbers; however, the Council welcomes recent commitments from the Applicant on this issue, which, begin to address some concerns, but are subject to agreement of the processes in the CTMP&TP, as above.
- The absence of a daily assessment of the change in HGV movements.

However, in order to be helpful to the examiner, the below provides comments on the specific locations identified within the technical note based on the Applicant's assessment method. Therefore, are subject to the assessed travel patterns.

<u>Red Lodge Dumbbell Roundabout North</u>

Elms Road – given the very low surveyed figures of vulnerable road users, the Council does not disagree with the Applicant's conclusions.
A11 NB On-Slip Red Lodge – The Council does not agree with the Applicant's conclusion on link sensitivity. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off peak and therefore unlikely to have a material impact on the operation of the highway network.

Newmarket Road South – The Council welcomes the Applicant's attempt to address our concerns; however, disagrees that Elms Road can be used in isolation to estimate the level of NMU movements at this location; at best it may provide an indication, but movement between Red Lodge and

Worlington, and subsequently Mildenhall would not form part of the figures provided. As a result, the Council do not currently agree with this conclusion.

Red Lodge Dumbbell Roundabout South

Newmarket Road North – The conclusion is the same as for Newmarket Road South above.

A11 SB Off-Slip Red lodge – The Council disagrees with the reasoning here that the off-slip's sensitivity is not high as it connects to the local road network. Any disruption to the operation of the off-slip could potentially have significant consequences on the operation of the strategic road network. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off peak and therefore unlikely to have a material impact on the operation of the highway network, albeit remain concerned about very peaky arrival and departure patterns.
Warren Road – No direct response is made regarding Warren Road, the Council remains concerned around the impacts through the town. Clarification is sought as it appears that classification of this link as high sensitivity would result in a change in the magnitude of effect on this corridor.

B1085 Turnpike Road – No new evidence or reasoning has been provided here, and so the Council maintains its position.

A11 SB On-Slip – The Council does not disagree with the conclusions. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off peak and therefore unlikely to have a material impact on the operation of the highway network, albeit remain concerned about very peaky arrival and departure patterns.

B1056 Bury Road / Herringswell Road / Gazeley Road

B1506 Bury Road (East) – It is believed that the Applicant is misrepresenting the Council's position here as we are well aware that sensitivity is not a product of impact. The Council is concerned about the increase in right turning vehicles, but these have not determined our suggested sensitivity. The Applicant has indicated that junction modelling has been undertaken and provided the results. However, in order to confirm that the Council accepts any assessment, we would need the origin of the turning movements, the full model outputs and a drawing of the junction including geometries to determine the acceptability of the model. That being said, the Council would agree with the conclusions drawn from those results, albeit based on the caveat around the assessment hour being subject to the assessed shift patterns, which needs to be repeated.

Gazeley Road – No new evidence or reasoning has been provided here, and so the Council maintains its position regarding the sensitivity of the location for NMUs. However, it is recognised that the change in traffic flows appears to be very low, albeit there is some confusion between Chapter 13 of the Environmental Statement [APP-045] and the new technical note, and so the Council considers that there is unlikely to be a material impact.

B1506 Bury Road (West) – The Applicant has indicated that junction modelling has been undertaken and provided the results However, in order to confirm that the Council accepts any assessment, we would need the origin of the turning movements, the full model outputs and a drawing of the junction including geometries to determine the acceptability of the model. That being said, the Council would agree with the conclusions drawn from those results, albeit based on the caveat around the assessment hour being subject to the assessed shift patterns, which needs to be repeated.

With regards to the assessment of impacts on NMUs, no new evidence or reasoning has been provided here, and so the Council maintains its position, but recognises that this will not materially impact conclusions at this location.

Herringswell Road – No new evidence or reasoning has been provided here, and so the Council maintains its position. As above, it would have been beneficial to have the numerical change in traffic flows included for comparison. This is particularly important given the concerns we raised within Annex F of our Local Impact Report [REP1024] regarding the traffic flows being reported at certain locations including Herringswell Road and Gazeley Road, as it makes undertaking reasonable comments more difficult.

A14 Junction 37

A142 Fordham Road North – No new evidence or reasoning has been provided here, and so the Council maintains its position, but recognises that this will not materially impact conclusions at this location.
A14 WB Off-Slip East – The Council does not agree with the conclusion on link sensitivity. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off-peak and therefore unlikely to have a material impact on the operation of the highway network.

In summary, there remain matters within the assessment that SCC does not agree with but that these are not of such significance that they would materially change the assessed impacts and further discussion would not be of benefit to the examination. Therefore, subject to the application of robust controls, monitoring, reporting and enforcement to secure the assumed construction movements and prevent journeys outside the assessed development peaks SCC would propose to the examiner that this matter is concluded as far as the authority is concerned.

Additional comments on Sunnica East Access I

The applicant has proposed that the visibility should be based on a departure (one step down) from the desirable stopping sight distance as shown in table 2.1of CD109. Whilst SCC is prepared to accept the use of the measured 85%ile traffic speeds for this location it has not accepted the principle of reducing visibility one step below the desirable minimum.

[redacted]

For a design speed of 70kph (40mph), table 2.10 indicates a desirable minimum of 120m with one step below the desirable minimum of 90m.

CD109 is a document issued by National Highways for Highway Link Design and in SCC views an acceptable document for assessing forward visibility on links, ie away from junctions. CD123 is the document that relates to junction design. Appendix F of Suffolk Design Street Guide sets out SCC's position on visibility, based on DMRB and Manual for Streets guidance. For a 40mph design speed, this would be a y distance of 120m.

[redacted]

https://www.suffolk.gov.uk/assets/Roads-and-transport/maintaining-roads-pavements-and-verges/5647_21%20-%20Suffolk%20Design%20Street%20Guide%20v26.pdf

CD123 section 3.4 and table 3.4 address the visibility at minor junctions and direct accesses. The y distance is stated as corresponding to the desired minimum SSD for the speed of the minor road (ie 120m in CD109). CD123 also states in 3.8 and 3.8.2 that the minimum X distance should be either a) 9.0m or b) 2.4m and that Where it is not feasible to locate point X fully in accordance with a), the minimum distance used to locate point X should be as close to a) as practicable, but no less than b). In this case, SCC would accept an X distance of 2.4m.

The stage 1 road safety audit has concluded that additional signing is required. As yet the applicant has not indicated what these signs could be and therefore SCC cannot comment on their appropriateness or acceptability.

SCC's position remains that y=120m and x = 2.4m is the minimum acceptable for access I and reserves its position on a requirement for supporting signage.