

# **Suffolk County Council (20031377)**

Answers to Examining Authority's Questions 2 (ExQ2)

## **Sunnica Energy Farm (EN010106)**

**Deadline 5**

**13 January 2023**

**Preamble:**

This document has been prepared based on a template provided by the Planning Inspectorate case team. For ease of use, questions which are not addressed to SCC have been greyed out.

**Abbreviations used:**

<b>PA2008</b>	The Planning Act 2008	<b>ExA</b>	Examining Authority
<b>AC</b>	Alternating Current	<b>LEMP</b>	Landscape and Ecology Management Plan
<b>ADR</b>	Alternative Dispute Resolution	<b>LIR</b>	Local Impact Report
<b>Art</b>	Article	<b>LHA</b>	Local Highway Authority
<b>ALA 1981</b>	Acquisition of Land Act 1981	<b>LPA</b>	Local Planning Authority
<b>ALC</b>	Agricultural Land Classification	<b>LVIA</b>	Landscape and Visual Impact Assessment
<b>AP</b>	Affected Person	<b>MoD</b>	Ministry of Defence
<b>BESS</b>	Battery Energy Storage System	<b>NE</b>	Natural England
<b>BoR</b>	Book of Reference	<b>NGESO</b>	National Grid Electricity System Operator
<b>CA</b>	Compulsory Acquisition	<b>NGET</b>	National Grid Electricity Transmission plc
<b>CCC</b>	Cambridgeshire County Council	<b>NMU</b>	Non-motorised user
<b>CEA</b>	Cumulative Effects Assessment	<b>NPPF</b>	National Planning Policy Framework
<b>CPO</b>	Compulsory Purchase Order	<b>NPS</b>	National Policy Statement
<b>CEMP</b>	Construction Environment Management Plan	<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>CTMP and TP</b>	Construction Traffic Management Plan and Travel Plan	<b>PHE</b>	Public Health England
<b>DC</b>	Direct Current	<b>PRN</b>	Primary Route Network
<b>dDCO</b>	draft Development Consent Order	<b>PRoW</b>	Public Right of Way
<b>DCO</b>	Development Consent Order	<b>PSED</b>	Public Sector Equality Duty
<b>EC</b>	East Cambridgeshire District Council	<b>R</b>	Requirement

<b>EIA</b>	Environmental Impact Assessment	<b>RPG</b>	Registered Park and Garden
<b>EM</b>	Explanatory Memorandum	<b>SAC</b>	Special Area of Conservation
<b>EN-1</b>	Overarching National Policy Statement for Energy	<b>SCC</b>	Suffolk County Council
<b>ES</b>	Environmental Statement	<b>SI</b>	Statutory Instrument
<b>FPRF</b>	United States Fire Protection Research Foundation	<b>SoS</b>	Secretary of State
<b>FRA</b>	Flood Risk Assessment	<b>SPA</b>	Special Protection Area
<b>GLVIA</b>	Guidelines for Landscape and Visual Impact Assessment	<b>SuDS</b>	Sustainable drainage system
<b>HRA</b>	Habitats Regulations Assessment	<b>TP</b>	Temporary Possession
		<b>WSC</b>	West Suffolk Council

### 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>

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## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
<b>2.0</b>	<b>Principle and Nature of the Development</b>		
Q2.0.1	The Applicant	<b>Community benefit</b>	
Q2.0.2	The Applicant	<b>Temporary development</b>	
Q2.0.3	Mr Munro	<b>Relevant planning decisions and appeals</b>	
Q2.0.4	Mr Harvey	<b>Land use strategy</b>	
Q2.0.5	The Applicant	<b>Electricity generation and food production</b>	
Q2.0.6	The Applicant	<b>NPS EN1</b>	
Q2.0.7	The Applicant	<b>NPS EN-1</b>	
Q2.0.8	The Applicant	<b>Land parcels E12, E13, E05</b>	

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
Q2.0.9	SCC	<p><b>Land parcels E12, E13, E05</b></p> <p>If the ExA were to recommend that parcels E12, E13 and E05 should remain, please identify the extent of the PV solar panels in those parcels that would effectively mitigate impacts.</p>	<p><b>E12</b></p> <p>The Councils strongly consider that to “effectively mitigate impacts” E12 should be omitted from the scheme as stated in the LIR (8.6 bullet 2, 8.57, 10.175, 10.203, 10.204, 10.205), however the following reduction in solar panels (see Figure 1) would reduce those impacts to <u>some</u> degree that would be meaningful in terms of landscape impact but would still leave residual impacts to be compensated or offset in some other way.</p> <ul style="list-style-type: none"> <li>• Provide an appropriate set back from U6006 to reduce the visual impact of having panels on both sides of the route. Please see Figure 1 showing E12, below.</li> <li>• Allow further screen planting along the boundary of E12, including with ECO3, which should be limited to a hedge.</li> <li>• Require cable crossings across the U6006 to be drilled rather than trenched to retain existing trees and minimise effects.</li> <li>• Enable the reduction of visual impacts in landscape terms on users of the U6006 road without increasing the impacts on ecology.</li> </ul> <p>The following residual issues would persist:</p> <ul style="list-style-type: none"> <li>• Because construction and operational access to E12 is restricted by ECO3, one crossing across U6006 would remain, with unacceptable impacts on TPO trees which form part of a pine line (G81-avenue of Scots pine and G82q dense group of oak, hawthorn, blackthorn, elm, AIA [REP3-021] p40 and TPP sheet 14). This could not be effectively mitigated.</li> <li>• The residual panels within E12 would continue to impact on Stone Curlew that</li> </ul>

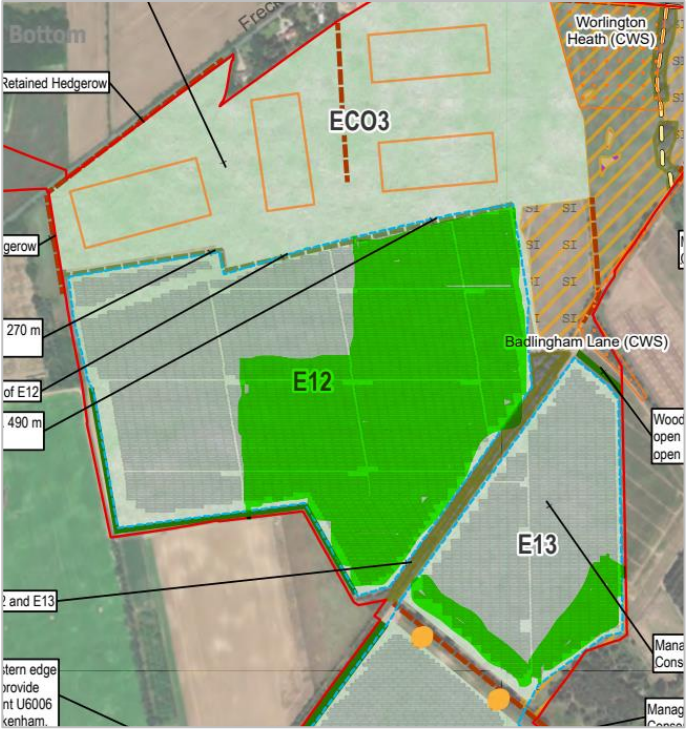
## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			<p>have regularly nested in ECO3 and E12 and potentially on the offsetting land in ECO3.</p> <p><b>E13</b></p> <p>The Councils' position is that to "effectively mitigate impacts" E13 should preferably be omitted from the scheme as stated in the LIR (8.96, 8.97) and [REP4-131] Agenda item 2b, and 2c, however the following reduction in solar panels (see Figure 1) would reduce those impacts to <u>some</u> degree and that would be meaningful but would still leave the residual impacts to be compensated/offset in some other way.</p> <ul style="list-style-type: none"> <li>• Implementation of the above changes to E12, in particular providing an appropriate set back from U6006 to reduce the visual impact of having panels on both sides of the route.</li> <li>• Set back of the solar panels and all other infrastructure from the veteran trees (T216 and T218, TCP sheet 14 AIA REP3-021) on the southern boundary of E13</li> <li>• Set back of the panels to retain the acid grassland in E13 (T13 assessed to be of county importance (Pg 8C-35 APP-079) and E13 eastern margin assessed to be on county-regional importance for invertebrates (p. 8D-21 APP-080)) Figure 2.2 [APP-030]</li> </ul> <p>The following residual issues would persist:</p> <ul style="list-style-type: none"> <li>• Because construction and operational access to E12 is restricted by ECO3, one crossing across U6006 would remain, with unacceptable impacts on TPO trees which form part of a pine line (G81-avenue of Scots pine and G82q dense group of oak, hawthorn, blackthorn, elm, AIA REP3-021 p40 and TPP</li> </ul>

## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			<p>sheet 14). This could not be effectively mitigated.</p> <ul style="list-style-type: none"> <li>The residual panels within E13 would continue to impact on Stone Curlew that have nested E13.</li> </ul>  <p><b>Figure 1:</b> Showing the solar panels to be removed from E12 and E13 shaded in light green</p> <p><b>E05</b> The Councils' preferred option is to apply the mitigation hierarchy and avoid harm, by removal of E05 as stated in SCC post hearing submission [REP4-124], in the LIR ([REP1-024] paras 8.6 bullet 2,</p>



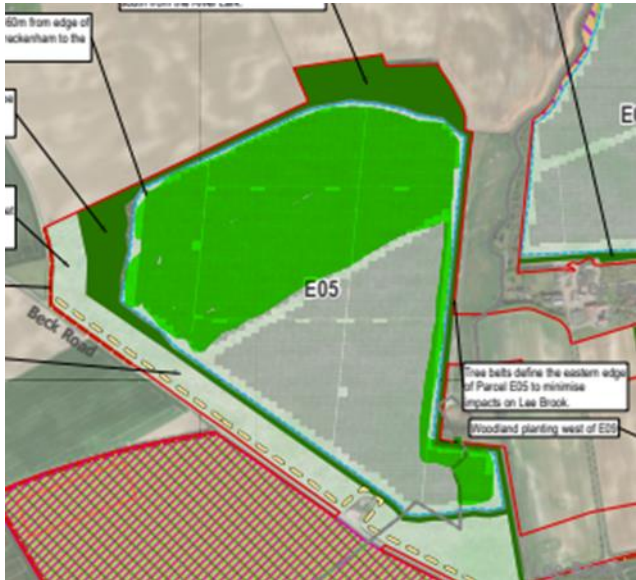
## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			<p>8.57, 10.124, 10.162, 10.164, 10.198) and WSC post hearing submission [REP4-131] Agenda item 2b. Only avoidance by removal will “effectively mitigate impacts”. However, the following reduction in solar panels would reduce those impacts to <u>some</u> degree and that would be meaningful but would still leave the residual impacts to be compensated/offset in some other way.</p> <ul style="list-style-type: none"> <li>• Reduce the north-western extent of E05 to an existing field boundary or the break in solar panels as indicated in Figure 2, outside the plane crash side.</li> <li>• Reduce the south-eastern extent of the solar panels to create a set back from Lee Brook and provide a riparian planting scheme so that the watercourse becomes more legible in the landscape, without truncating views along Beck Road, and to facilitate a walking route outside the flood zone.</li> <li>• Reduce the eastern extent of the solar panels to facilitate a walking route outside the flood zone.</li> </ul> <p>The applicant would still be required to:</p> <ul style="list-style-type: none"> <li>• Acknowledge the plane crash site and enable a reflective/ commemorative space.</li> <li>• Provide the proposed permissive footpath along Beck Road, locating it within the 100m strip away from the road. The greater distance between the road and the footpath would benefit users and also reduce any disturbance to ECO1 and ECO2.</li> <li>• Provide an additional recreational footpath route around E05 to reduce the potential for recreational access into ECO1 and ECO2.</li> </ul>

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
			<ul style="list-style-type: none"> <li>Facilitate connection of the permissive footpath and any other route with Isleham (along Beck Road and/or Sheldrick Road).</li> </ul> <p>The following residual issues would persist:</p> <ul style="list-style-type: none"> <li>Views across the open, 'empty' landscape would be truncated, albeit to a lesser degree.</li> <li>E05 would be lost as potential nesting habitat for Stone Curlew.</li> </ul>  <p><b>Figure 2:</b> showing panels to be removed from E05 shaded in light green</p>
Q2.0.10	SCC	<b>Rights of way</b>	<p>The County Councils, as Highway Authorities, are working with local communities on a Public Access mitigation package. The Councils are currently in consultation with local communities regarding access</p>

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
		What rights of way improvements are proposed as an offsetting measure if avoidance or mitigation were not possible?	<p>improvements but not in a position to provide a finalised package at present. The Councils will provide a fuller update at Deadline 6, reflecting their engagement with local communities.</p> <p>There has not yet been engagement from the Applicant regarding specific public access mitigation measures, but the Councils acknowledge the Applicant's willingness to contribute to funding such measures (as indicated at paras 7.9.4 and 7.9.5 of REP4-032).</p>
Q2.0.11	The Applicant	<b>Landscape</b>	
Q2.0.12	The Applicant	<b>General</b>	
Q2.0.13	The Applicant	<b>Timescale of proposed development</b>	
<b>2.1 Air Quality and Human Health</b>			
Q2.1.1	The Applicant	<b>Dust mitigation</b>	
Q2.1.2	The Applicant, ECDC, WSC	<b>Battery energy storage system (BESS): COMAH and P(HS) regulations</b>	
Q2.1.3	The Applicant	<b>BESS: design parameters</b>	
Q2.1.4	The Applicant	<b>BESS: design assumptions</b>	

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
Q2.1.5	The Applicant, SCC, CCC, ECDC, WSC	<b>Discharge of Requirement 7: DCO</b> Are you satisfied with the arrangements for discharge of DCO Requirement 7 in relation to the OBFSMP, as currently drafted (Rev 03, 18 December 2022 [REP4-006])? If not, please explain and supply your proposed form of amended wording.	Noting that a further revision of the OBFSMP (as well as the Applicant's answers to ExQ2 and other materials on battery fire safety issues from other parties) are being submitted at deadline 5 and such material would need to be reviewed as to any consequential implications for Requirement 7, SCC is currently content with the drafting of Requirement 7 and strongly supports the recognition that it should be the discharging authority for the final BFSMP.
Q2.1.6	The Applicant	<b>BESS: consultation</b>	
Q2.1.7	East of England Ambulance Service Trust	<b>BESS: consultation</b>	
Q2.1.8	The Applicant	<b>BESS: consultation</b>	
Q2.1.9	The Applicant	<b>BESS: consultation</b>	
Q2.1.10	The Applicant	<b>BESS: fire risk</b>	
Q2.1.11	The Applicant	<b>BESS: emergency response plan (ERP)</b>	
Q2.1.12	The Applicant	<b>BESS: emergency response plan (ERP)</b>	
Q2.1.13	East of England Ambulance Service Trust,	<b>Major accidents and disasters</b> The Applicant has stated in its response to our ExQ1.1.46 [REP2-037] that <i>"the only pollutant of</i>	Noting that a further revision of the OBFSMP is being submitted at deadline 5, the Fire and Rescue Services do not believe there is sufficient consideration to hazardous substances brought about by deflagration

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
	Cambridgeshire Fire and Rescue Service, Suffolk Fire and Rescue Service	<p><i>concern is hydrogen fluoride (HF) and ... concentrations of HF will be below the AEGL-1 value before reaching any sensitive receptors. As such there are not expected to be any adverse effects from HF. The expectation is that exposure will be avoided rather than mitigated.</i>” and that it would be the responsibility of the host authorities and fire services as first responders “to decide if measures such as evacuation or advising people to stay indoors and keep windows closed were appropriate.”.</p> <p>Are you content with these assumptions and that the issue of HF concentrations and how these will be dealt with is properly addressed in the OBFSMP?</p>	of the units and subsequent intervention by the services. This is linked to not having a confirmed battery technology. It is challenging to provide clarity that there will be no impact to receptors when SCC has noted issues in the LIR [REP1-024] (see para 15.2 and Appendix 26 [REP1-024a]) regarding the modelling and placement of the plume prediction in relation to the final plan layouts of the BESS locations.
Q2.1.14	The Applicant	<b>BESS: unplanned atmospheric emissions</b>	
Q2.1.15	The Applicant	<b>BESS: unplanned atmospheric emissions</b>	
Q2.1.16	The Applicant	<b>Human health, safety and welfare</b>	
Q2.1.17	The Applicant	<b>BESS: final version of OBFSMP</b>	
Q2.1.18	The Applicant	<b>BESS: health and safety related consents</b>	
Q2.1.19	The Applicant	<b>Emergency response and evacuation planning</b>	
<b>2.2 Biodiversity and Nature Conservation (including Habitats Regulations Assessment)</b>			
Q2.2.1	The Applicant	<b>Habitats Regulations Assessment (HRA)</b>	

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
Q2.2.2	The Applicant	<b>Arable flora</b>	
Q2.2.3	The Applicant	<b>Stone Curlew</b>	
Q2.2.4	The Applicant	<b>Stone Curlew</b>	
Q2.2.5	Natural England	<b>Stone Curlew</b>	
Q2.2.6	The local authorities	<b>Stone Curlew and archaeology</b> Please explain what you consider to be the potential conflicts between management of the archaeological areas and the Stone Curlew plots, as referred to in your joint Local Impact Report [REP1-024].	The stone curlew offsetting areas are illustrated on the Environmental masterplan [REP3-022] and include areas of ECO1, ECO2 and ECO3.

## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			 <p><b>Figure 3:</b> Extracted from Environmental Masterplan [REP3-022]</p> <p>The ES [APP-039] section 7.7.9 and 7.7.164 states that 'A number of areas in Sunnica East Site A will be required for stone curlew mitigation. These will be contained within the ECO1 and ECO2 areas (shown in Figures 3-1 and 3-2). These contain archaeological remains, which are assessed below. The stone curlew</p>

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
			<p>mitigation will comprise a non-intrusive methodology to establish grassland in these areas. These areas will be subject to further evaluation through trial trenching prior to preparation of the ground for ecological mitigation’.</p> <p>Section 7.7.165 states that ‘It is anticipated that, subject to the continued usage of the non-intrusive methodology, the archaeological remains within the ECO1 and ECO2 areas will continue to be preserved in situ, and there will be no below ground impact. There is therefore no change anticipated to the asset’.</p> <p>Section 7.8.2 explains that ‘Preserving assets in-situ would involve the embedded design measures, including: b. Minimising vegetation clearance, land disturbance and land take and consequent loss of archaeological remains’</p> <p>LIR 7.42 explains the importance of the ten areas of significant (high value) archaeological interest. The paragraph states that ‘An Historic Environment Management Plan should be prepared to provide a mechanism by which these sites will be suitably protected under pasture, managed and maintained - indicating by whom throughout the life of the solar farm, along with proposals for what will happen to them should the site be decommissioned and dismantled’.</p> <p>LIR 7.46 states that ‘Environmental Management Plans should include a section for Heritage Management. Sites that are to be protected under grass should include appropriate schedules of cutting and de-scrubbing to prevent invasive roots or matting</p>



## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
			<p>to occur that would require future invasive mitigation need, the avoidance of which is desirable’.</p> <p>English Heritage provide guidance on the preservation of archaeological sites in situ. The guidance requires maintenance of a closed grass sward with little, if any, soil intrusion or chemical input that might change existing soil conditions. West Suffolk Council have submitted a copy of this guidance with their submission.</p> <p>[APP-258] - Offsetting Habitat Provision for Stone-Curlew Specification sets out the requirements for ECO1, ECO2 and ECO3. It states that Stone Curlew nest plots will be established using various cultivation techniques to create a rough tilth and or bare ground ‘depending on ground conditions and other environmental constraints’. In addition, 108ha of close-cropped grassland will be created, which within Sunnica East site A will be chalk grassland. Within Sunnica East site B the grassland is intended to be semi-natural grassland, characteristic of the Brecks heaths.</p> <p>The document sets out that within areas ECO1 and ECO3 the Stone Curlew plots will be created following the recommendations in guidance provided by RSPB and in the Countryside Stewardship Higher Tier guidance (4.1.9), and a cultivation programme (which replicates the RSPB guidance) is set out in section 4.1.11. This guidance is not referred to in section 4.1.12 - 4.1.15 ‘Establishment and management of plots and grassland in archaeological areas (ECO2)’.</p> <p>LIR 8.63 points out inconsistencies in which area (of ECO1 and/or ECO2) is archaeological mitigation and</p>


## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
			<p>the concern that there are potentially conflicts in managing the area for both archaeology and for Stone Curlew.</p> <p>Natural England's guidance on the provision of Stone Curlew mitigation is set out in the advice note 'Sourcing and managing mitigation land'. This explains that 'Stone Curlew generally nest in open fields with dry soil, with areas of dry, bare, stony ground or low vegetation'. The guidance sets out how stone curlew offsetting land can be established and managed. West Suffolk Council have submitted a copy of this guidance with their submission.</p> <p>Aspects of the stone curlew offsetting which have the potential to cause conflict with preservation and management of archaeological interest include:</p> <ul style="list-style-type: none"> <li>• Reduction of nutrient levels prior to the establishment of grassland</li> <li>• Establishment of grassland</li> <li>• Management of bare ground nesting plots</li> <li>• Management/grazing of grassland</li> </ul> <p>The archaeological requirements /constraints include:</p> <ul style="list-style-type: none"> <li>• Disturbance or intrusion of the topsoil must be minimised/avoided including topsoil removal or inversion</li> <li>• Additions to the existing topsoil can alter the PH of the soil and harm buried archaeology. This includes chemicals which should be minimised</li> <li>• Cultivation of topsoil is limited to disc harrowing or drilling, and ploughing should be avoided</li> </ul>

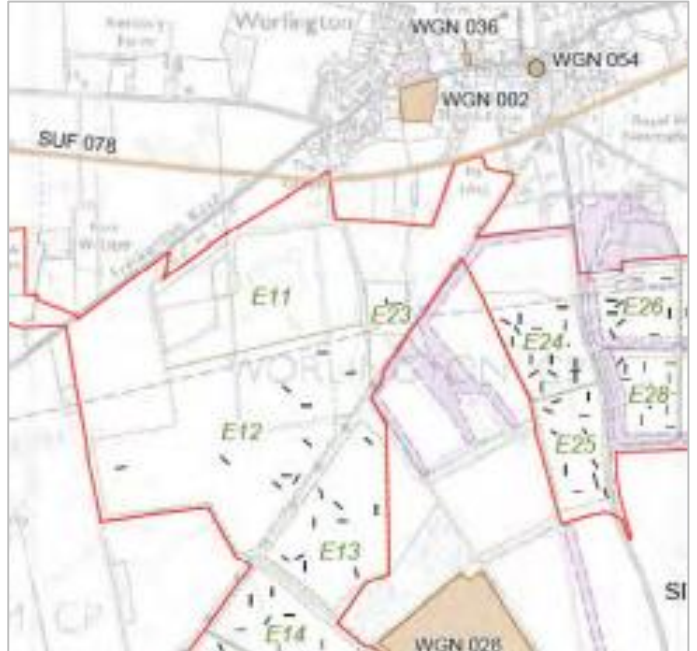
## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			<ul style="list-style-type: none"> <li>• The grassland should be a closed grass sward maintained to prevent scrub development</li> <li>• Bare ground should be avoided to prevent wind blow which might expose buried archaeology</li> <li>• Disturbed ground plots can be delivered where trial trenching has demonstrated that buried archaeology is not present. Areas where trial trenching has been undertaken is illustrated at Annex 3 - 6.2 Appendix 7H: Sunnica East Sites A and B Archaeological Trial Trenching Report [PDA-002]</li> <li>• Grassland maintenance could include grazing by sheep or mechanical topping/mowing</li> <li>• Grazing by rabbits must be avoided because of the disturbance rabbits cause.</li> </ul>
			

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
			 <p><b>Figure 4:</b> Extracts from figure 1 of [PDA-002] showing locations of trial trenching</p> <p>Ecological requirements /constraints</p> <ul style="list-style-type: none"> <li>• Stone Curlew generally nest in open fields with dry soil, with areas of dry, bare, stony ground or low vegetation.</li> <li>• Reduction of key soil nutrients from the arable land is required to achieve semi-natural grassland, required prior to grassland establishment. There are several techniques to achieve this.</li> <li>• For grassland establishment natural regeneration is the preferred technique with active weed management.</li> </ul>

## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			<ul style="list-style-type: none"> <li>• Ideally, management of a low sward would be achieved through intense grazing by rabbits and controlled livestock grazing.</li> <li>• Mowing outside the breeding season, particularly in the early years of vegetation establishment.</li> <li>• Scope to adapt and change management prescriptions should the offsetting land not deliver on the objective to achieve 'no net loss of stone curlew in and around the scheme.'</li> </ul> <p>ECO1 – this area is known to be of high archaeological value and is shown as archaeological mitigation on the Environmental Masterplan. Trial trenching has identified two areas where the 2ha disturbed Stone Curlew ground plots can be delivered. The third area tested by trial trenching is unacceptable to the County archaeologists. The Stone Curlew nesting plots shown on the Environmental Masterplan do not appear to correspond to the locations that are acceptable to County archaeologists.</p> <p>ECO2 – this area is also known to be of high archaeological value but is not shown as archaeological mitigation on the Environmental Masterplan. Trial trenching has identified three areas where the 2ha disturbed Stone Curlew ground plots can be delivered. The Stone Curlew nesting plots shown on the Environmental Masterplan appear to differ from these trial trenching locations and include areas which are unacceptable to County archaeologists.</p> <p>ECO3 – the archaeological interest of this area has not been fully investigated. The area has been shown to contain some archaeology through geophysical</p>

## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
			<p>surveying but has not been evaluated. No trial trenching has been undertaken and therefore the potential for delivery of bare ground plots in this area remains unknown.</p> <p>The Councils are currently not satisfied that all the conflicts between the preservation of archaeology within the site and the delivery and maintenance of stone curlew offsetting have been reconciled. The concern is that currently it is not certain that the ten 2ha disturbed ground plots can be delivered. In addition, for those plots which can be delivered, it is not clear whether the archaeological constraints will further restrict the ability to deliver top-quality habitat for Stone Curlews.</p> <p>The Councils are also concerned that the archaeological constraints will restrict management of the area in the future and limit any adaptive management measures that might be necessary to the effectiveness of the stone Curlew Offsetting land, particularly as there is currently no contingency for the situation that the Stone Curlew mitigation strategy is not effective.</p>
<b>2.3 Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations</b>			
<b>The ExA has no questions in this round.</b>			
<b>2.4 Cultural Heritage and Historic Environment</b>			
Q2.4.1	The Applicant	Chippenham Park RPG	
<b>2.5 Draft Development Consent Order (dDCO)</b>			

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
The ExA has no questions in this round.			
<b>2.6 Environmental Statement – general matters</b>			
The ExA has no questions in this round.			
<b>2.7 Landscape and Visual Effects</b>			
Q2.7.1	The Applicant	Landscape and ecology management plan (LEMP)	
Q2.7.2	Liam and Clare MacGillivray	Design principles	
Q2.7.3	The Applicant	Hedgerows	
Q2.7.4	The Applicant; and Say No To Sunnica action group	Visual Impact	
<b>2.8 Noise and Vibration</b>			
Q2.8.1	The Applicant	Noise affecting equestrians	
<b>2.9 Socio-Economics and Land Use</b>			
Q2.9.1	The Applicant	Agricultural survey	
Q2.9.2	The Applicant	Agricultural survey	
Q2.9.3	The Applicant	Soil quality	

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
Q2.9.4	The Applicant	<b>ALC assessment</b>	
Q2.9.5	The Applicant	<b>Food security</b>	
Q2.9.6	The Applicant	<b>Agricultural land productivity</b>	
Q2.9.7	The Applicant	<b>Agricultural land productivity</b>	
Q2.9.8	The Applicant	<b>Crop yields</b>	
Q2.9.9	The Applicant	<b>Public rights of way (PRoW)</b>	
Q2.9.10	CCC	<b>PRoW closures</b> Regarding CCC's D4 Submission - Comments on the Applicant's D3 and D3A submissions [REP4-137] relating to concerns about closure of parts of the PRoW network, please would the CCC specify wording for amendment to the CTMP and/or propose amendments to the DCO that will ensure closures are as a last resort after thorough discussion with the LHA and once it has been agreed that there is no other alternative, including location and timing of signage?	Whilst this question is addressed to CCC, SCC shares these interests in the PRoW network. SCC supports the concerns raised by CCC and will comment on any specific wording proposed at D6.
Q2.9.11	CCC	<b>PRoW disruption</b> CCC is requested to provide its proposed wording to include within the DCO to ensure disruption to PRoW users is mitigated through agreement as to reinstatement works and inspection and certification by the LHA, and restoration of boundary features agreed	Whilst this question is addressed to CCC, SCC shares these interests in the PRoW network. SCC supports the concerns raised by CCC and will comment on any specific wording proposed at D6.



## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
		with CCC, as discussed in CCC D4 Submission - Comments on the Applicant's D3 and D3A submissions [REP4-137].	
Q2.9.12	CCC	<b>PRoW and haul roads</b> Please provide a proposed wording to amend the DCO [REP4-005] Schedule 2: Detailed design approval, to include approval of design for hedgerows of PRoW to be removed and restored together with the requirement for reinstatement of the surface and width of PROW affected by haul road/cable route crossings, including provision for inspection and certification by the LHA.	Whilst this question is addressed to CCC, SCC shares these interests in the PRoW network. SCC supports the concerns raised by CCC and will comment on any specific wording proposed at D6.
Q2.9.13	The Applicant	<b>PRoW plans</b>	
Q2.9.14	The Applicant	<b>PRoW improvement plan</b>	
Q2.9.15	The Applicant	<b>Public access strategy</b>	
Q2.9.16	The Applicant	<b>Permissive access</b>	
Q2.9.17	The Applicant	<b>Permissive path within E05</b>	
Q2.9.18	The Applicant, CCC	<b>Fordham walking group concerns</b>	
Q2.9.19	The Applicant	<b>Soils</b>	
<b>2.10</b>	<b>Traffic, Transport and Highway Safety</b>		

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
Q2.10.1	The Applicant	<b>General</b>	
Q2.10.2	The Applicant	<b>General</b>	
Q2.10.3	The Applicant	<b>Access to Sunnica East Site B</b>	
Q2.10.4	The Applicant	<b>Abnormal load access to Burwell National Grid substation</b>	
Q2.10.5	The relevant highway authorities	<p><b>Site access and crane routes</b></p> <p>In your joint response to our ExQ1.10.45 and 1.10.46 [REP2-078], you express reservations about various issues relating to site access and crane routes, including road widths, the use of Manual for Streets on high speed rural roads and a post consent crane access route review.</p> <p>Are you satisfied with the Applicant's response [REP3A-036] to the concerns you raise? If not, what issues are outstanding, and are they capable of satisfactory resolution?</p>	<p>AIL access from A11 / A14 to site: A number of matters of detail remain to be resolved e.g., the over-run of the island at B1102 Mildenhall Road / U6003 Elms Road junction.</p> <p>SCC has, in principle, accepted the provision of passing places on Elms Road. This resolves the issue of MfS road widths for this location.</p> <p>SCC does not accept that the applicant has demonstrated that the proposed temporary traffic management proposals are safe and deliverable.</p> <p>SCC does not accept that the applicant has demonstrated that the site access layouts for use in the operational phase are safe (e.g., acceptable visibility).</p> <p>SCC does not consider that Access I is safe due to the limited visibility to the south.</p>

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
			<p>SCC notes that in 1.5.22 of their response [REP3A-036] the applicant states that they are still considering matters raised in our response.</p> <p>In reference to [REP3A-036] at para 1.10.46, SCC notes that not all ports have established AIL routes. Lowestoft is the only port with a DfT advisory high and heavy route. SCC understands from discussions that the Applicant intends to engage a haulier to conduct a review of AIL routes and looks forward to submission of those details.</p> <p>Within the SoCG between the applicant and NH [REP2-048], SCC cannot see a reference to AIL movements on the SRN other than stop-over laybys.</p> <p>While SCC would accept a post consent crane (and AIL) review, SCC considers there is a fundamental need to demonstrate feasible and safe access routes identifying any impacts or constraints prior to the end of the examination. The LHA is concerned that it may be put in a position that it would have to either accept unsatisfactory routes in the future or prevent or delay the project.</p> <p>SCC response to REP4-141 includes further comments on these matters.</p>
Q2.10.6	The relevant planning and highway authorities	<p><b>Baseline conditions</b></p> <p>We note the Applicant's response to our ExQ1.10.81 [REP2-037] relating to baseline traffic conditions [REP2-037], where it is stated that <i>"The LHAs concern was whether there was a scenario where construction flows and baseline flows combined were likely to be</i></p>	<p>The applicant is correct that our original concern was that a mid-day shift change on a Saturday may coincide with a network peak greater than the Monday to Friday network peak with an adverse impact in terms of delay. However, SCC would concur with the ExA that the proportional impact should also be considered and agree that this is necessary as there may be adverse impacts, other than delay, such as</p>

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
		<i>higher than in the weekday assessment, and not whether there would be a higher proportionate impact</i> . Surely a Saturday assessment should be undertaken as the additional weekend construction traffic will be proportionally higher and impact more on peaceful enjoyment?	that on the recreational use of highway and PRoW (e.g., fear and anxiety, severance, amenity) as their use for recreation at weekends is likely to be greater and the proportional increase in construction traffic higher than in a weekday.
Q2.10.7	The relevant highway authorities	<b>Baseline conditions</b> We note your response to our ExQ1.1.85 [REP2-078] regarding the Applicant's assertion in its Transport Assessment [APP-117] that there is no " <i>particular safety concern that needs to be considered as part of the Scheme proposals.</i> " and to the Applicant's response [REP3A-036] in which it refers to further review at various locations and the need for and timing of safety audits. Are you satisfied with the Applicant's response? If not, what issues are outstanding, and are they capable of satisfactory resolution?	SCC has concerns regarding safety, specifically at the A11 NB offslip joining Elms Road (LIR 13.71). While SCC acknowledges that the historic frequency of collisions would not require investigation, SCC are concerned that this junction will see a significant increase in traffic concentrated at specific times and that this may create conditions where a significant increase in collisions occurs. SCC has proposed that the applicant commits to monitoring road safety incidents and, if these are project related, commit to engaging with the LHA to resolve such issues, if necessary, by committing to highway improvements.
Q2.10.8	The relevant planning and highway authorities	<b>Assessment methodology</b> We note your response to our ExQ1.10.98 [REP2-078], particularly in respect of the assessment of links, and to the Applicant's response [REP3A-036] [REP2-041]. Are you satisfied with this response?	The Applicant states that link sensitivity has been agreed, which is incorrect. SCC has not agreed to the proposed criteria, although SCC considers discussions on this matter to have been concluded. Further information is provided in Appendix A of REP4-141.
Q2.10.9	The Applicant	<b>Forecast peak HGV movements on local roads</b>	
Q2.10.10	The Applicant	<b>Forecast peak HGV movements on local roads</b>	

## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
Q2.10.11	The relevant planning and highway authorities	<p><b>Joint LIR</b></p> <p>We refer to the joint LIR [REP1-024] and to the Applicant's Response [REP3A-034].</p> <p>Other than topics raised elsewhere in this section of questions ExQ2, are there any other outstanding transport and access issues?</p> <p>If so, please give details and indicate whether or not these issues are capable of satisfactory resolution.</p>	<p>See Annex A, attached below, for detailed comments on outstanding transport and access issues.</p> <p>Key remaining matters are:</p> <ul style="list-style-type: none"> <li>• <u>Protective Provisions / Side Agreement</u>: Draft Heads of Terms have been provided by Sunnica, which are being reviewed by SCC. Parties have agreed to meet to discuss further, but currently unresolved.</li> <li>• <u>CTMP</u>: Matters raised regarding adequacy of controls, monitoring, reporting and enforcement have not been resolved. Can be resolved by alterations to CTMP to make measures more robust.</li> <li>• <u>Safe access during the operational phase</u>: Not resolved and unclear whether resolution is possible.</li> <li>• <u>Temporary traffic management measures during the construction phase</u>: Not resolved. It is difficult to see how some measures can be resolved due to physical constraints of highway preventing compliance with code of practice. Further discussion may be necessary.</li> </ul>
Q2.10.12	The Applicant	<b>Updated Framework CTMP and TP [REP3A-004]</b>	
Q2.10.13	The Applicant	<b>Updated Framework CTMP and TP [REP3A-004]: crane and AIL routes</b>	
Q2.10.14	The relevant highway authority	<b>Updated Framework CTMP and TP [REP3A-004]: crane and AIL routes</b>	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

## SCC Responses to ExQ2

Responses due by Deadline 5: Friday 13 January 2023

ExQ2	Question to:	Question:	SCC Answers:
		<p>In paragraph 5.4.11, the Applicant states that <i>“the routes included within the review do not necessarily mean they will be the final routes of the AILs. It will be the hauliers’ responsibility to finalise the AIL route in coordination with the relevant highway authorities and any other relevant authority ...”</i></p> <p>If the actual route chosen to each site access is different from the route identified here, are you satisfied that the powers available to you in the DCO are sufficient to ensure that the actual route agreed for each site access is no worse in terms of impact and effects than the case which has been assessed and reported in the ES?</p>	<p>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, and SCC now understands that the Applicant intends to engage a haulier and awaits submission of further information.</p> <p>There remain outstanding issues on the terms of the CTMP (as above). For all of these reasons, SCC is not currently satisfied that there are adequate controls in the DCO to ensure that impacts and effects will be no worse than has been assessed and reported in the ES.</p>
Q2.10.15	The Applicant	<b>Updated Framework CTMP and TP [REP3A-004]: site accesses</b>	
Q2.10.16	The Applicant	<b>Updated Framework CTMP and TP [REP3A-004]: construction staff vehicle numbers</b>	

## SCC Responses to ExQ2

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ExQ2	Question to:	Question:	SCC Answers:
2.11	Water Resources, Flood Risk and Drainage		
Q2.11.1	The Applicant	Sustainable Drainage Systems	

## Annex A: SCC outstanding issues related to Highways and Transport

**Table 1: Issues raised in LIR [REP1-024]**

LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.4	AIL	The impact of AILs, including on highway structures, has not been fully assessed.	While SCC accepts that the applicant has provided information on AIL access from the SRN to the site accesses the routing between leaving the port and the exit from the SRN has not been considered. Whilst there are comments about co-ordinating removal / reinstatement of highway infrastructure REP3A-004 7.2.22) and giving advance notice to owners of structures (7.2.24) no mechanism is suggested to review structures nor to reimburse highway authorities for their costs.	This can be resolved by a commitment to include these measures in a side agreement or protective provisions.
13.6	CTMP	The Councils seek a number of changes to management plan, including controls of traffic and HGV movements in the outline Construction Transport Management Plan (OCTMP) and Outline Travel Plan (OTP) to limit the transport impacts to those assessed in the ES and TA.	REP4-141 includes details of omissions.	A revised CTMP could address these concerns.
13.7	Protective Provisions	The Councils are also seeking protective provisions, to discharge their responsibilities to access, inspect and maintain the public highway within the order limits.	The latest version of heads of terms for side agreement was received on the 20/12/2022.	The heads of terms are being reviewed by SCC.
Table 9: 1g	Access (boundary)	Applicant does not demonstrate that the junction layout required to provide safe access can be achieved fully within highway or DCO boundary	REP4-141:1g: As the Applicant has only recently approached SCC for information regarding the highway boundary, SCC considers its comment remains valid.	We anticipate that once boundary details are



## SCC Responses to ExQ2: Annex A

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
		prior to approval may result in the later provision of a safe access being unfeasible.		available and reviewed this mater can be resolved subject to no anomalies being identified.
Table 9: 1h	Access	Visibility Applicant has not demonstrated that visibility appropriate to the speed of the road can be achieved fully within highway or DCO boundary prior to approval may result in the later provision of a safe access being unfeasible. Construction of an inappropriate junction would be significantly detrimental to highway safety.	REP4-141 :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.	Not resolved.
Table 9: 1r	Access	Traffic Management There are sites where it appears unlikely that an intrinsically safe design can be achieved without additional mitigation measure being in place while the access is in use. No specific details appear to have been provided in this regard. failure to provide appropriate safe access to the highway would be significantly detrimental to highway safety	REP4-141: 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	Not resolved.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			carriageway width is suitable for passing vehicles in our LIR (REP1-024) 13.75.	
Table 9: 1s	Access	Proposed reinstatement of accesses The proposed reinstatement of verges after the construction phase, while retaining access during the operation phase will fail to provide safe access for the intensification of use, which would be significantly detrimental to highway safety.	REP4-141: 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'.	Not resolved.
Table 9: 1w	RSA	The Road Safety Audit provided in the application does not appear to have been submitted by or to the Local Highway Authority or had its brief or designers' response reviewed by them as the Overseeing Organisation. Its validity is therefore questionable, and it is not clear whether the hazard to highway safety has been adequately resolved	REP4-141: 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.13.64 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	Not resolved. Applicant can commit to undertaking a RSA 1 on accesses other than Access I.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			concerns (e.g. departures from design standards) to be audited. This is no more onerous than what is expected for most development.	
13.16	AIL	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.	In SCCs opinion the applicant has not demonstrated that its transport management plan complies with this guidance.	Not resolved.
13.51		Table 2-6 Summary of Equipment and Material Requirements in Outline Skills, Supply Chain and Employment Plan [APP-268] does not quantify the materials required and does not identify items such as aggregate for haul roads and hardstands, concrete or asphalt.	No further information has been supplied to allow the authority to analyse or challenge the assumptions made and thus comfort that the number of HGVs will be as forecast.	Robust controls on HGV numbers (by day on each link or to each access) would reduce the risks of these calculations being found to be inaccurate.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.58	AIL	The Applicant has not demonstrated whether highway structures in the area adjacent to the site (and the wider regional route to suitable ports) can carry appropriate heavy loads. At para 2.1.4 of Appendix P: Proposed Changes to the Application [AS-276] the applicant implies that discussions with the police and LHA will be conducted at a later stage. Therefore, at this time uncertainty remains whether AILs can access the site.	REP4-141: Response to LIR (REP3-019)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.	SCC understands that the applicant has engaged a haulier to conduct a review the route from a suitable port of origin to the site to demonstrate that there is a viable route acceptable to NH and the LHAs.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.6	Access (boundary)	The Councils are concerned that the Applicant has not requested highway boundary details of the relevant junctions so that it can be confirmed that AILs (or other works) do not extend beyond the public highway except where already identified. In many cases, it will be necessary to commission surveys to establish boundaries. The use of Ordnance Survey baseline map data also constitutes a risk particularly where tolerances between loads and structures are small.	REP4-141:1g: As the Applicant has only recently approached the LHA for information regarding the highway boundary SCC considers its comment remains valid.	We anticipate that once boundary details are available and reviewed this any anomalies between the order limits and boundaries can be identified, although an element of risk remains that without topographic survey data. Issues may therefore arise during the detailed design phase.
13.64	RSA	Except for Access I none of the accesses has been subject to a Stage 1 Road Safety Audit. For highway works, both County Councils as Local Highway Authority require this at the outline planning stage for the majority of applications, hence this should be provided for this development.	REP4-141: 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	Not resolved

## SCC Responses to ExQ2: Annex A

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			audit with SCC nor updated the transport assessment with the speed data for this location (although it has provided this data to SCC).	
13.5	Road Safety	The Councils identify a number of highway safety issues/potential issues at several key junctions, particularly with the A11, which have to be addressed by the Applicant.	REP4-141: Response to LIR (REP3-019) 13.117 to 13.118. SCC welcomes the Applicant's commitment to collect and assess collision data during the construction phase. However, this not reflected in the CTMP n or other management document.	This matter can be resolved by including this as a commitment within the CTMP or side agreement.
13.71	Road safety	A11 Northbound off-slip / Elms Road Junction Although the frequency of collisions at this location has not caused SCC to prioritise road safety improvements at the location, SCC does periodically receive complaints about near misses. Typically, these refer to drivers failing to stop at the give way lines. With the proposed construction traffic, the Councils are concerned that the greater volume of traffic will increase the frequency of crashes. Of particular concern is the pm workers peak where the volume of traffic exiting Elms Road towards Red Lodge is likely to delay drivers turning right from the A11 slip off. This may lead to drivers taking greater chances and choosing smaller gaps with an increase likelihood of collisions.		

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.72	Access (site I)	The Councils are concerned that Access I is unsafe for use as a construction access due to the poor visibility to the south and high traffic speeds on Newmarket Road.	<p>REP4-141: 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 2.1 of 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. 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.</p> <p>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, i.e., 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. 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 (i.e. 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)</p>	SCC's position remains that y=120m and x = 2.4m is the minimum acceptable for Access I.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			<p>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.</p>	



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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.81	AIL	B1102 Mildenhall Road / C603 Freckenham Road, Freckenham Brief mention is made in the application regarding vegetation clearance, but the Councils are concerned that the applicant has not fully considered what work is necessary at these locations and could use its powers in the DCO to undertake works within the public highway without appropriate consent, and if necessary local consultation.	The plan provided by the applicant ( <b>REF</b> ) still shows the vehicle modelled over-runs the island. 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. 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.	Not resolved.
13.94	Operational Phase / Maintenance	The Councils' main concern is the potential for operational traffic movements to result from replacement of PV cells, batteries or other infrastructure during the life span of the project, for which there has been no assessment. This is both in terms of the number of movements that result, for example replacement of large numbers of PV cells, or access or the larger loads or cranes requiring to travel to or from the substation or battery storage sites.	REP4-141: 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. SCC understands that the applicant will propose a	Not resolved.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			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.	
13.100	Access (site J)	Golf Links Road is recognised by the Applicant as being unsuitable for HGV access and the other two accesses are to be removed during the operational phase. The Applicant is asked to clarify how HGVs required for access or maintenance are to access this part of the site.	No change.	Not resolved.
13.105	Access	The access widths are based upon a single vehicle movement, such that a vehicle waiting to leave the site would fully obstruct the access. This would result in vehicle dwelling in the highway risking collision with other road users. In the absence of appropriate traffic data for all sites, it is not possible to fully consider this risk. It should however be reasonable to anticipated that two-way movement for appropriately sized vehicles is likely to be necessary at many sites and must therefore be accommodated to ensure safe use of the highway.	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.	Not resolved.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.107	Access (site I)	Access I is of great concern with respect to the limited visibility to the south.	<p>REP4-141: 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 2.1 of 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. 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, i.e., 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. 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 (i.e., 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</p>	<p>SCC's position remains that y=120m and x = 2.4m is the minimum acceptable for Access I.</p>

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			<p>practicable, but no less than b). In this case, SCC would accept an X distance of 2.4m.</p> <p>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.</p>	

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.113	Access	It appears likely that appropriate visibility at junctions may not be achieved at some locations and that there may be some reliance on traffic management such as traffic signals and signing to afford safe access. While this may be adequately managed during the construction phase under a suitable traffic management plan when the access is regularly trafficked, there is a risk that shortcuts will be taken when access is required on an ad hoc basis during then operational phase, especially if the requirements of providing Traffic Management are considered disproportionate to the work to be undertake. Use of such accesses during the operational phase may result in inappropriate use of unsuitable accesses to the detriment of highway safety.	REP4-141: 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. 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.	Not resolved. Concerns remain.
13.116	Access (boundary)	Highway boundary and topographic surveys are necessary to ensure that the proposals are deliverable	In REP4-141, SCC made the comment: 'As the Applicant has only recently approached the LHA for information regarding the highway boundary SCC consider its comment remains valid'. Having checked with our highway record team, SCC have not been approached with regard to highway search enquiries in the parishes of Worlington, Freckenham, and Red Lodge.	Unresolved. Applicant has not sought highway boundary information from SCC.

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.118	Road Safety	Commitment from the Applicant to undertake improvements to road safety if these are identified during the above monitoring during the construction phase.	REP4-141: Response to LIR (REP3-019) 13.117 to 13.118. SCC welcomes the Applicant's commitment to collect and assess collision data during the construction phase. However, this not reflected in the CTMP n or other management document.	This matter can be resolved by including this as a commitment within the CTMP or side agreement.
13.49	CTMP	The Councils consider that HGV movements and routes should be controlled during the construction period and that those proposed in the submitted Framework Construction Traffic Management Plan & Travel Plan [APP-118] are not robust, contrary to para 5.13.11 of EN-1. Details of the internal site layout are not included within the application so the Councils cannot confirm that the parking arrangements for HGVs are adequate. Similarly, the FCTMP&TP is not, in the Councils' opinion, satisfactory in terms of avoiding disruption to users of the public highway including public rights of way	REP4-141: Response to APP3-014 Revised CTMP: 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	SCC would expect the CTMP to include: maximum number of HGVs using individual routes or using specific accesses. The number of workers on site and numbers of LGVs arriving / departing to be recorded. This would show compliance with HGV, LGV movements and car share ratio achieved.
13.120	CTMP	Management plans secured by the DCO currently lack sufficient commitments to ensure that: the development impacts do not occur in the peak hours; <ul style="list-style-type: none"> <li>• the number of HGV movements do not exceed those assessed;</li> <li>• the number of workforce movements do not exceed those assessed;</li> <li>• car share assumptions are achieved;</li> <li>• monitoring, reporting and enforcement is</li> </ul>		

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
		<p>effective; or that</p> <ul style="list-style-type: none"> <li>the workforce travel patterns are sustainable</li> </ul>	<p>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</p>	
13.122	CTMP	<p>To ensure that the final TP can be effectively enforced, it is important to define what will constitute a breach. The following actions are considered to constitute a breach of the TP, whereby corrective measures would be required:</p> <p>Construction workers overspill parking on the public highway;</p> <ul style="list-style-type: none"> <li>Exceedance of assessed daily employee vehicle numbers;</li> <li>Construction employee traffic operating within the development area outside of agreed hours or shift patterns; and</li> <li>Construction traffic being driven inappropriately, e.g. speeding.</li> </ul>	<p>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</p>	<p>Details of what constitutes a breach should be included in CTMP and reported.</p>

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.123	CTMP	<p>3The Councils consider that monitoring and reporting outputs need to be more robust to ensure compliance with the impacts assessed and therefore no material difference – between the project as implemented and as consented – to occur. These should include the following:</p> <ul style="list-style-type: none"> <li>• Progress of the project against specific gateways;</li> <li>• Freight movement to/from the site;</li> <li>• Details of non-compliance with routing or speed limits;</li> <li>• Near misses or safety related incidents;</li> <li>• Freight compliance with appropriate exhaust emissions (Euro VI);</li> <li>• Transport of AILs to/from the site;</li> <li>• LGV movements to/from the site;</li> </ul>	<p>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, SCC would expect these numbers, presumably based on those assessed in the Environmental Statement and Transport Assessment, to be included in the FCTMP&amp;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</p>	<p>CTMP should include what is reported based on suggestions in LIR.</p>
13.124	CTMP	<p>Staff movement to/from the site, including modal split to ensure compliance with car share targets and compliance with shift patterns; and</p>		<p>Details of what constitutes a breach should be included in CTMP and reported.</p>
13.125	CTMP	<p>Information on complaints received on transport related issues including parking</p>		<p>Details of what constitutes a breach should be included in CTMP and reported.</p>



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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			<p>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. SCC 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)</p>	

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			<p>prior to submitting the final CTMP&amp;TP for approval. SCC notes that in 7.2.30 there is no control on the routing 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. SCC 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</p>	

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			management • Freight movement to/from the site (routing, 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.	
13.126	CTMP	The monthly monitoring report should be submitted to the Local Highway Authorities and a contribution for time and costs associated with reviewing and monitoring by the Local Highway Authorities should be paid.	REP4-141: 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 SCC looks 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 than accepted in the EA1(N) OCTMP.	Revised CTMP with commitment to agreeing PPA based on these outline requirements.
13.127	CTMP	Within the FCTMP&TP the following actions are considered to constitute a breach of the CTMP, whereby corrective measures would be required: Exceedance of assessed daily HGV numbers: • Construction HGV traffic operating outside of agreed hours; • Construction HGVs not adhering to the agreed routes; or	<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005234-">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-005234-</a>	

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
		<ul style="list-style-type: none"> <li>• Construction HGV traffic being driven inappropriately, e.g. speeding</li> </ul>	<a href="#">8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf</a> 1.3 Planning Performance Agreement 24. The Applicant will not undertake any works to any highway or highway asset that is the responsibility of SCC until a Planning Performance Agreement (PPA) has been agreed with SCC (both parties acting reasonably and in good faith) which will allow SCC to recover reasonable costs including but not limited to: <ul style="list-style-type: none"> <li>• Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway;</li> <li>• Visual and structural condition surveys of the highway (A1094, B1069, B1122, Lovers Lane, Sizewell Gap and parts of A12) and contributions towards structural repairs;</li> <li>• Surveys and assessment of highway structures to facilitate AIL movements;</li> <li>• Damage to the Highway (in accordance with the provisions of Section 59 Highways Act 1980);</li> <li>• Creation of temporary traffic regulation orders (including SCC consultation and issue of permits);</li> <li>• Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements;</li> <li>• Technical approval and inspection of highway accesses (Requirement 16)</li> </ul>	
13.131	CTMP	1The Councils require provisions to ensure that the relevant thresholds are not exceeded to ensure that the impacts considered in the ES are accurate and the embedded mitigation remains appropriate. These thresholds should be for: <ul style="list-style-type: none"> <li>• Maximum HGV movements per day</li> <li>• Maximum HGV movements per hour between 0700 and 0900 and 1600 to 1800</li> <li>• Haulage fleet to be 100% compliant with emissions requirements (Euro VI)</li> </ul>		

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			<p>and Work No.35, Work No.37, Church Road Friston traffic management and cable crossings as detailed in the approved construction traffic management plan; and</p> <ul style="list-style-type: none"> <li>• Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PROW Strategy etc).25. In undertaking works on the public highway, the Applicants shall ensure through appropriate agreements and approvals that:</li> <li>• The areas of the public highway occupied pursuant to Articles 12, 13 or 15 of the DCO are maintained to the standards defined in SCC's Highway Operational Management Plan (SCC, July 2019) (taking account of the category of highway asset) during that period of occupation.</li> <li>• The Applicants shall ensure that the periods and physical extents of occupation are defined, and that SCC is protected against third party claims caused by the Applicants' occupation of the public highway pursuant to Article 12, 13 or 15 of the DCO.</li> <li>• In seeking to temporarily stop up, alter, divert or use as a temporary working site a street to which Article 12(5)(c) of the DCO applies, the Applicants shall allow a reasonable advance notice period in line with the New Roads and Street Works Act (Department for Transport</li> </ul>	

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
			<p>1991) and the Statutory Guidance for highway authority permit schemes (Department for Transport 2019), which directs three months' notice for Major Works, 10 days for Standard Works and three days for Minor Works).</p> <ul style="list-style-type: none"> <li>• Notwithstanding the above, SCC is not unreasonably refused access to inspect or maintain the highway in accordance with its duties under the Highways Act 1980.</li> </ul> <p>26. Any dispute or difference arising in connection with the terms of the proposed PPA between the Applicant and SCC, shall be referred to arbitration in accordance with Article 37 of the draft DCO.</p>	
13.137	Protective Provisions	The Councils consider it reasonable to pursue either protective provisions for the LHAs similar to those which are proposed for National Highways, or alternatively a side agreement with the LHAs to ensure that the LHA can control works to the public highway and recovers reasonable costs for doing so.	Latest version of heads of terms for side agreement received on the 20/12/2022. SCC is reviewing the document. However, the proposals in the EA1(N) Outline Construction Traffic Management Plan are considered an appropriate basis for discussion with regard to LHA approval for construction of accesses.	Protective provisions or a side agreement could resolve this.
13.140	CTMP	An obligation to undertake visual and structural surveys of all routes intended to carry construction HGVs prior to, during and after the construction period and to undertake or pay for the highway authority to undertake any such work that is deemed necessary to return the carriageway to its original condition	A commitment is made in 7.2.15 of the CTMP (REP3A-005). However, no reference to agreeing the nature of the condition surveys with the LHAs are included in the CTMP nor the latest version of heads of terms for side agreement received on the 20/12/2022.	Revised CTMP with commitment to agreeing PPA based on the outline requirements in

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LIR Ref	Topic:	Issue:	Deadline 5 position:	Resolution:
13.141	CTMP	A contribution for review of submitted materials for monitoring the CTMP and for monitoring the TP for the life of the project.	Not included in the latest version of heads of terms for side agreement received on the 20/12/2022.	13.126, 127, 131.
13.142	Protective Provisions	The sum of 7.5% of the cost of total off-site highway works on or before the commencement of construction, to be applied to cover the full audit, legal costs, S278 agreements, dedication of land into highway, land compensation events and supervision fees for the transport schemes to be implemented by the Applicants under the DCOs.	Not included in the latest version of heads of terms for side agreement received on the 20/12/2022.	
13.143	Protective Provisions	Reimbursement of the Highway Authority for all costs associated with assessments of highway structures and the moving, removing, installed and reinstalling street furniture, streetlights, traffic signals, traffic islands and all other highway infrastructure including structures necessary for safe movement of AILs and any associated traffic management and temporary traffic orders	Not included in the latest version of heads of terms for side agreement received on the 20/12/2022.	Protective provisions or a side agreement could resolve this.

**Table 2: Issues identified in response to Updated Construction Traffic Management Plan [REP4-141]**

Document	Topic:	Description:	Resolution:
REP4-141	CTMP / dDCO	In previous responses to the ExA written questions (5.1.1 in [REP3A-049]), SCC 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.	Not resolved.
REP4-141	Access	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. SCC understands that the applicant will propose a mechanism for monitoring maintenance	Not resolved.

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Document	Topic:	Description:	Resolution:
		operations and awaits these proposals with interest. This also applies to paragraph 5.3.11 regarding access to the Grid Connections.	
REP4-141	Access	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.	This remains unchanged.
REP4-141	CTMP (car share ratio)	In 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. For example, this change would require more parking than allowed for in the present layout.	New issue. Not resolved.
REP4-141	Link Sensitivity	In 1.24, the Applicant states that link sensitivity has been agreed, which is incorrect. SCC has not agreed to the proposed criteria although SCC considers discussions on this matter to have been concluded – see our response to Appendix A Technical Note Transport and Access.	Concluded with exception of Saturday movements.