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30 May 2025

Via E-Mail to:

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Dear Ms McKay,

## **NORTH FALLS OFFSHORE WIND FARM (EN010119) – DEADLINE 5 SUBMISSION**

### **REPONSE TO THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION (EXQ2)**

Please find attached in **Appendix A** our responses to the two Written Questions addressed to National Highways by the Examining Authority on 13 May 2025:

- Q.7.0.3 - relating to cumulative effects.
- Q.17.0.1 - relating to terrestrial traffic and transportation, specifically junction modelling.

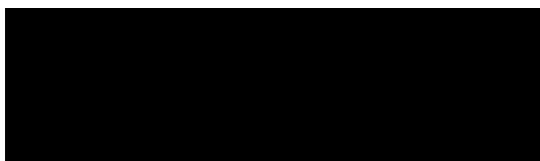
Following National Highways' Deadline 4 submission, we have engaged in further constructive meetings with the Applicant regarding the outstanding matters related to the Strategic Road Network (SRN).

A number of these matters have now been addressed to the satisfaction of National Highways, as reflected in the Statement of Common Ground (SoCG), which the Applicant will submit at Deadline 5. However, National Highways remains concerned about the potential impacts of construction traffic on some of the junctions and this is addressed in our response to Q17.01 in Appendix A of this submission. We consider that some additional modelling is required but that most junctions could be dealt with by further amendments to the OCTMP.



In addition to this outstanding matter, we continue our discussions with Applicant on National Highways' Protective Provisions. These are now agreed in principle subject to the resolution of one issue in the Side Agreement. We envisage that this is resolvable before the close of the Examination.

Yours sincerely,



Spatial Planning Manager (East)

**Project:** North Falls Offshore Wind Farm (ref: EN010119)

**Subject:** Response to The Examining Authority's Written Questions and Requests for Information, dated 13 May 2025 (ExQ2)

**Date:** 30 May 2025

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## 1. Introduction

1.1 Two Written Questions raised by the Examining Authority for the North Falls Offshore Wind Farm DCO application were specifically addressed to National Highways. These were as follows:

- **Traffic and Transport Study Area – Cumulative Effects (Q.7.0.3)**

Traffic and Transport Study Area – Cumulative effects SCC's Comments on any submissions received at the previous deadline [REP3-068] item LIR\_SCC\_08 states: "SCC recognises and accepts that the applicant's TTSA was agreed with National Highways and defers to their judgement given that the A12 south of Ipswich is within National Highways' ("NH's") administration. SCC appreciates the clarification given by the applicant on the worst-case peak increase in traffic flows and that the project is not likely to cause significant effects on the A12.

Regarding cumulative impacts, SCC notes that several nationally significant infrastructure projects ("NSIPs") in Suffolk will be using the A12 concurrently with the applicant. The fact that the TTSA's [Traffic and Transport Study Area] of these projects do not overlap with the applicant's does not necessarily mean that there will be limited potential for cumulative impacts. East Anglia ONE North, East Anglia TWO and Sizewell C each include the A12 in their study areas which the applicant will also have to use to access the A120. There will also be other projects using the A12 concurrently with the applicant, including Five Estuaries, Norwich to Tilbury, and Bramford to Twinstead. SCC recognises that this section of the A12 is within Essex and under the administration of NH and so defers to NH and Essex County Council ("ECC") on this issue and the discretion of the Examining Authority as to whether they wish to explore this matter further."

- **Could ECC and National Highways comment on SCC's concern regarding the potential for cumulative effects on the A12?**

and

- **Terrestrial Traffic and Transportation (Q17.0.1)**

**Review of traffic models of Horsley Cross and Bentley Road junctions**

- (i) With reference to the Statement of Common Ground between the applicant and National Highways [REP4-056], could National Highways confirm the timescales for confirming its position following the review of the above traffic models?
- (ii) What are the implications if the review is not concluded before the completion of the examination of the application on 28 July 2025 or that further modelling of other junctions is required?

1.2 National Highways' response to these questions is set out below in points 2 and 3 of this note.

**2. Traffic and Transport Study Area – Cumulative Effects (Q.7.0.3)**

- 2.1 National Highways have recently reviewed the traffic forecasts for A12 Junction 29 (Ardleigh Crown Interchange) and are in discussion with the Applicant with regards to assessing the impact of the proposed growth at this junction. (See point 3 below)
- 2.2 Beyond A12 Junction 29, based on recent information provided by North Falls' transport consultants, the anticipated impact of the North Falls project on the A12 is expected to be minimal.
- 2.3 Table 1 below presents the trip assignment for North Falls construction traffic (worst case peak hour trips) on the A12 from A12 Junction 29, showing northbound and southbound flows in the morning and evening peak periods in two different construction scenarios provided by the Applicant.
- 2.4 The figures suggest that the North Falls project is unlikely to have a significant impact at A12 junctions around Ipswich, as trips are distributed fairly evenly in each direction and generally result in fewer than 30 vehicles in each direction along the mainline A12.
- 2.5 In Scenario 1 (the worst-case scenario), there are more than 30 trips during the AM peak on the A12 northbound, and during both peak periods on the A12 southbound. However, we anticipate these trips are expected to be strategic in nature and will disperse across several junctions, making it unlikely that they will be concentrated at any single junction.
- 2.6 Therefore, it is reasonable to conclude that there is no need to request the Applicant to extend the transport study area for the North Falls project beyond the A120 and A12 Junction 29.

Table 1: Trip Assignment for North Falls' trip on the A12 travelling northbound and southbound

| Assignment at<br><br>A12 Junction 29 (Ardleigh<br>Crown Interchange) | Op2     |      |           |         |      |           | Sc1     |      |           |         |      |           |
|--|---------|------|-----------|---------|------|-----------|---------|------|-----------|---------|------|-----------|
|  | AM Peak |      |           | PM Peak |      |           | AM Peak |      |           | PM Peak |      |           |
|  | HGVs    | LGVs | Total     | HGVs    | LGVs | Total     | HGVs    | LGVs | Total     | HGVs    | LGVs | Total     |
| A12 northbound   | 12      | 11   | <b>23</b> | 12      | 11   | <b>23</b> | 23      | 12   | <b>35</b> | 16      | 12   | <b>28</b> |
| A12 southbound   | 12      | 16   | <b>28</b> | 12      | 16   | <b>28</b> | 23      | 20   | <b>43</b> | 16      | 20   | <b>36</b> |

### 3. Terrestrial Traffic and Transportation (Q17.0.1)

#### **Review of traffic models of Horsley Cross and Bentley Road junctions**

- 3.1 National Highways' transport consultant, AECOM, have completed the majority of their review of the Junction modelling undertaken by the Applicant's consultants for the Horsley Cross and Bentley Road junctions on the A120. National Highways is satisfied that the modelling demonstrates there are no issues of concern associated with the Horsley Cross junction. For the Bentley Road junction, AECOM need to review traffic flow matrices which were provided by the Applicant on 28 May 2025 to confirm this junction can operate without expected problems. This review is expected to be completed by 6 June 2025.
- 3.2 In addition to the above, AECOM have reviewed trip assignment traffic flow diagrams provided by the Applicant's consultants on 29 April. These indicate forecast increases in excess of 30 vehicles at each of the junctions east of Horsley Cross and at A12 Junction 29 (Ardleigh Crown).
- 3.3 National Highways is concerned about the potential for traffic congestion at these junctions, and potential safety issues as a consequence, to arise during the construction phase of the North Falls project.
- 3.4 National Highways' policy is that a junction capacity assessment must be undertaken for any junctions that are projected to experience more than 30 additional vehicle movements during a peak hour. Table 2 below presents what we understand to be the trip assignment for North Falls traffic (worst case peak hour trips) at several SRN Junctions under the two construction scenarios.
- 3.5 However, to enable agreement before the close of the Examination, National Highways would be content to waive this policy requirement in this instance, if the Applicant can make some further changes to the OCTMP to provide assurance that peak hour movements at these junctions will not exceed 30 additional movements. Notwithstanding this, National Highways remain of the opinion that the A120 / Harwich Road junction, which is expected to have the largest increases in traffic, should be modelled.
- 3.6 National Highways is committed to working with the Applicant to ensure that the OCTMP is sufficiently robust and suggests additional text similar that below, is provided:

*"Should, once appointed, the Principal Contractor(s) identify the requirement for vehicle movements through any of the A120 junctions or the A12 Junction 29 that would result in greater than 30 two-way vehicle movements, during a highway network peak hour the Principal*

*Contractor(s) will discuss with NH the requirement for any supporting junction capacity assessments and/ or the need for mitigating measures, before 30 two-way vehicle movements can be permitted. This would be undertaken as part of the preparation and approval of the Final CTMP(s) prior to the commencement of construction.”*

#### **4. Summary**

- 4.1 National Highways is not concerned about the impact of North Falls construction traffic, in combination with that arising from other projects, on A12 junctions in Suffolk due the expected traffic volumes and distance from the main work sites.
- 4.2 Junction modelling indicates no concerns regarding the future operation of the A120 / B1035 junction (Horsley Cross Roundabout). The position in respect of the A120 / Bentley Road junction will be concluded by 6 June 2025.
- 4.3 Demand forecasts for the junctions to the east of Horsley Cross and also A12 Junction 29 show exceedance above the level to require traffic modelling to be undertaken. However, National Highways is content to accept additional wording in the OCTMP to protect the operation of the SRN instead of further junction modelling, with the exception of Harwich Road junction.
- 4.4 Should these issues not be resolved by the close of the Examination, National Highways considers it will be necessary for a suitably worded requirement to be secured as part of the Development Consent order (DCO).

Table 2: Trip Assignment for North Falls' trip (worst case peak hour trips)

| SRN Junction   | Option 2 |      |           |         |      |           | Scenario 1 |      |           |         |      |           |
|--|----------|------|-----------|---------|------|-----------|------------|------|-----------|---------|------|-----------|
|  | AM Peak  |      |           | PM Peak |      |           | AM Peak    |      |           | PM Peak |      |           |
|  | HGVs     | LGVs | Total     | HGVs    | LGVs | Total     | HGVs       | LGVs | Total     | HGVs    | LGVs | Total     |
| A12 J29 (Ardleigh Junction)<br>(roundabout only)               |          |      | 36        |         |      | 31        |            |      | 48        |         |      | 42        |
| A120 / Harwich Road  | 30       | 36   | <b>65</b> | 30      | 30   | <b>59</b> | 38         | 55   | <b>93</b> | 38      | 47   | <b>85</b> |
|  |          |      |           |         |      |           |            |      |           |         |      |           |
|  |          |      |           |         |      |           |            |      |           |         |      |           |
| A120 / B1352 (Ramsey)  | 25       | 4    | <b>29</b> | 49      | 4    | <b>54</b> | 30         | 6    | <b>36</b> | 30      | 6    | <b>37</b> |
| A120 / Station Road / Parkeston<br>Road (Parkeston Roundabout) | 25       | 2    | <b>27</b> | 49      | 3    | <b>52</b> | 30         | 4    | <b>34</b> | 30      | 4    | <b>34</b> |
| St Nicholas (LRN but very close<br>to Parkeston)               | 25       | 1    | <b>25</b> | 49      | 1    | <b>50</b> | 30         | 1    | <b>32</b> | 30      | 2    | <b>32</b> |