

Comments for Deadline 2 – Cumulative traffic impacts

Sporle with Palgrave Parish Council represented by [REDACTED]

Executive Summary

1. *The AADT from August 2025 is more representative of peak traffic flows as it takes into account peak holiday period traffic and should be used to project a future baseline for 2031.*
2. *The need to deal in the examination with the cumulative aspects of High Grove and possibly Jafa schemes on traffic along the A1065 and wider area with the increasing likelihood of concurrent construction with the Drovers.*
3. *Concern that the requirements and purpose for each access junction and traffic route is clearly secured in the oCTMP and DCO and subsequent CMTP.*
4. *Concern that the number of closely spaced cumulative access points along the A1065 will create increased driver delays not just on the A1065 but over the wider road network.*
5. *Concern expressed over the practicalities of the planning of deliveries shown in oCMTP and asking for evidence where these methods have worked.*
6. *Concern that the increased traffic and delays will cause increased use of local minor roads as ‘rat runs.’*
7. *Concern that the review of collisions on the A1065 is not sufficient to allay local concerns for road safety on what is regarded as the most dangerous road in the county.*
8. *Suggest that localised capacity assessments are made and a wider assessment of the county’s roads in view of the increasing number of solar schemes being developed.*
9. *The need for more thought into the mitigation measures needed to gain local support and increased community involvement.*

Sporle with Palgrave Parish Council (PC) wish to make a number of comments with respect to the following submissions in relation to the impacts on traffic along the A1065 during the construction phase:

- ES 6.2.1 Chapter 9 Transport and Traffic (Tracked) REP1-037
- oCTMP (Tracked) REP1-053
- ES Appendix 9.2 Traffic Assessment APP-163
- High Grove PEIR Chapter 13 Traffic and Transport
- NCC LIR REP1-094
- NCC response Q15.0.6 to ExQ1 REP1-095
- NCC SoCG REP1-019

Sporle with Palgrave PC comments:

1. With reference to Table 2 below and the results of the AADT's undertaken and shown in the ES and Traffic Assessment, the baseline for 2031 does not appear to be based on the AADT done in August 2025. (This AADT was requested by NCC). This is far more representative of peak traffic flows during the busy holiday season when the A1065 is used by visitors accessing the North Norfolk Coast. The PC would contend that when using these figures, and using the same Tempro factor as used by the Applicant on the AADT October 24 figures, more realistic projected peak traffic figures for 2031 are obtained, and these should be the ones used in arriving at the increase in traffic numbers caused by construction of the scheme. This is shown on Table 2 below.
2. Table 2 also shows the impact of the Drovers construction traffic as supplied in the above documents based on the amended 2031 figures.
3. The NCC response to ExQ1 mentioned above states:
Yes, NCC are happy that the effects are unlikely to be significant based on the information currently available. As per my previous correspondence, continued coordination between High Grove Solar, your team and the Highway Authority will be essential as both applications progress.

This highlights the importance that PC representations have put on the need for speedy action during this examination to deal with the cumulative impacts caused by the increasing likelihood of construction taking place at the same time of both the Drovers and High Grove. There is the possibility of the Jafa solar development also impacting this too.

4. Table 2 also shows the possible impact of High Grove based on figures from their PEIR documentation. (An estimation based on those figures has been made for the Jafa development also.). (High Grove state that they are likely to build both Western and Central areas of the development at the same time and therefore taking the two major proposed entry points AP01 and AP02, it is reasonable to take 2/3 of their daily traffic movements assuming the other 1/3 will be to the smaller Western area.)
5. It is noted that High Grove has updated their figures in course of discussions with local communities in the form of meetings and emails, however it is unknown what figures they will submit with their DCO application. This further supports the contention made in point 3 above.
6. It is noted that NCC in their SoCG with the Applicant are still querying the methodology applied in assessing the cumulative impacts with High Grove.
7. NCC have stated in their LIR that they considered Route C as unsuitable for construction traffic so the whole of the Drovers will be accessed off the A1065 by access A and access B. Again, in the SoCG, they continue to discuss the requirements and purpose for each access junction and the routing of traffic with the Applicant.
8. The PC would wish to add their concern that this be clearly secured at this stage in the oCTMP as part of the DCO and any subsequent CMTP.
9. The overarching concern is the disruption to traffic traveling on the A1065 by the fact that there could be 4-5 construction access points between the A47 junction with the A1065 and where Southacre Road crosses the A47 just beyond Drovers access A and temporary access C as shown in Fig3.1 of the Traffic Assessment.

10. On leaving the A47 junction heading north on the A47 the construction accesses are as follows:

TABLE 1

<i>Access</i>	<i>Development</i>	<i>Distance from A47 junction</i>	<i>Distance from last access</i>
AP02	High Grove area C02 west of A1065	560m	N/A
B	Droves west of A1065	1184m	624
AP01	High Grove area C03 east of A1065	1312m	128m
C	Droves temporary access to east of A1065	Approx 2300m	988m
A	Droves access to west of A1065	Approx. 2400m	100m

Table 1 shows that over a distance of approximately 2.4km (1.5 miles) there will be possibly 4-5 construction accesses. This will cause considerable disruption with far reaching consequences if not properly managed and the PC is very sceptical of the general view of the Applicant and the traffic authorities that this will cause only insignificant impacts.

11. The PC welcomes that the oTP is appended to the latest version of the oCTMP. However, this is only a statement of intentions and no real hard data or actions to allay the PC's concerns and the concerns of local people. It only seems to concentrate on the traffic movements of operatives working on the site and not the considerable addition of HGV's to the traffic load which will be turning slowly off the A1065 and causing increasing delay to the traffic.
12. It is welcomed that in the oCTMP the intention is to avoid deliveries during the peak travel periods, the inclusion of arrival and departure procedures, plus the possibility of identification and GPS tracking measures to ensure correct routes are used. However, the practicalities of introducing these measures with delivery drivers (possibly foreign unused to UK driving conditions) passing through ports at times not under the contractor's control will make this considerably hard to achieve. The PC suggests that the ExA asks for evidence as to their effectiveness where these types of measure have been used.
13. It is noted that a 40mph temporary speed limit is imposed between access A and B. In likelihood of the High Grove development being built at the same time there will be a need to lengthen this speed restriction to somewhat before AP02, possibly back to the existing 40mph limit on the edge of Swaffham. This will cause further delay to traffic.
14. The potential for delay will cause drivers to take options to use alternative routes widening the traffic problems over a larger area. The Street in Sporle is already used by drivers seeking to use it as a 'rat run'; leaving the A1065 at Newton by Castle Acre to reach the A47 to head eastwards towards Norwich and also coming from the opposite direction too. The PC's concern is that this will only increase with the increased delays on the A1065, plus serious difficulties accessing the A1065 going north to Fakenham if the Jafa solar project is also in construction at the same time.

15. In addition, Sporle, Castle Acre and the communities of the Nar Valley will have increasing difficulties accessing the A1065 via the Southacre Road junction (both north and south) and the nearby Castle Acre junction. Junctions that are particularly difficult to negotiate with heavy traffic (vision is severely restricted with traffic approaching from the north on the Southacre junction).
16. The review of collisions along the A1065 over the last 3 years in the Traffic Assessment concludes that there are no existing highway safety concerns. However, the A1065 is considered to be by many in Norfolk to be the most dangerous road in the county and six accidents causing injury in that period will do nothing to allay that concern. With increasing delays on the A1065 during the construction of both Drovers and High Groves and the likelihood of increased traffic on associated minor roads as a result, the PC is concerned for road safety.
17. With the above in mind and despite the ES 6.2.1 Chapter 9 Transport and Traffic (Tracked) stating in 9.8.13 that no localised capacity assessments need to be made, the PC would suggest that these be undertaken to allay concerns about the wider impacts on the local road system and to help form more detailed mitigation.
18. The PC would suggest that further work be done on the cumulative wider impacts on the county road system, taking into account High Grove, Jafa and also the likelihood of the Shipdham Airfield solar and BESS project being in construction at the same time.
19. All of these measures require considerably more thought to avoid delays and restrictions to the local populace in moving about locally over a considerable period. This will potentially engender considerable antagonism towards the development unless well managed and with increased community engagement.

Location as shown on Fig
 2.2 Location of ATC
 surveys in Traffic
 Assessment

	<u>Observed AADT Oct 24</u>			<u>Observed AADT Aug 25</u>			<u>Future baseline 2031</u>			<u>Estimated Drokes 2-way construction trips from table 6.7 Traffic assessment</u>			<u>Addition of Drokes traffic to baseline 2031</u>		
	TOTAL	HGV's	% HGV's	TOTAL	HGV's	% HGV's	TOTAL	HGV's	% HGV's	TOTAL	HGV's	% HGV's	TOTAL	HGV's	% HGV's
1 A1065 south	7937	332	4%	9848	344	3%	8394	351	4%	464	86	19	8858	437	5
2 A1065 mid	7819	371	5%	9609	300	3%	8269	392	5%	387	10	3	8656	402	5
4 A1065 north	7125	398	6%	8952	299	3%	7535	421	6%	164	10	6	7699	431	6
							<u>Amended baseline 2031 on 2025 figures using same factor</u>			<u>Addition of Drokes traffic to amended baseline 2031</u>					
1 A1065 south							10415	371	4				10879	457	4
2 A1065 mid							10162	415	4				10549	425	4
4 A1065 north							9468	445	5				9632	455	5
							<u>Total traffic % change over amended baseline</u>								
	<u>High Groves estimated construction based on their PEIR</u>			<u>High Grove and Drokes concurrent added to amended baseline</u>											
	TOTAL	HGV's	% HGV's	TOTAL	HGV's	% HGV's									
1 A1065 south	297	124	42	11176	581	5			13						
2 A1065 mid	0	0	0	10549	425	4			10						
4 A1065 north	0	0	0	9632	455	5			8						
	<u>JAYFAR estimated construction</u>			<u>Addition of JAJA</u>											
	TOTAL	HGV's	% HGV's	TOTAL	HGV's	% HGV's									
1 A1065 south	30	22	73	11206	603	5			14						
2 A1065 mid	30	22	73	10579	447	4			10						
4 A1065 north	30	22	73	9662	477	5			8						

TABLE 2