



NH ref: NH/26/14731

Your Ref: EN0110019

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16 March 26

Email

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Dear [REDACTED],

EcoPower Suffolk

Thank you for consulting National Highways (NH) as per your letter dated 26th January 2026 in relation to the EIA Scoping Consultation in support of proposals for the EcoPower solar project in Suffolk.

NH has a vested interest in managing the Strategic Road Network (SRN), which in this case comprises the A11 which runs broadly north east-south west, approximately 20km to the east of the proposed order limits. The A14 is at a similar distance to the south and A47 to the north. When considering the impact of the proposals on the SRN, our interest focuses on the assessment of the junctions and links that include a series of junctions and links connecting with the local road network. This includes the junctions on the route of the A11 between Snetterton and Thetford, the A47 to the north and the A14 to the south which should be considered in terms of potential traffic impacts.

We have undertaken a high-level review of the project documentation comprising the EIA Scoping Report.

This response intends to provide sufficient details of NH's requirements to enable the applicant to consider SRN impacts in further documentation for the Development Consent Order (DCO) for the project.

This response includes further recommendations we envisage needing to see and the applicant to consider as part of further work.

We welcome that a detailed plan for consultation as the project evolves has been set out, and that we have been included at an early stage in the process.

The Proposed Development

It is understood that the proposal comprises:

- A solar photovoltaic (PV) generating station exceeding 100 MW.
- A Battery Energy Storage System (BESS) (centralised or decentralised options).
- Approximately 1,175 ha within the draft Order Limits:
 - 900 ha – Principal Area (solar arrays, BESS, substations, ecological areas)
 - 275 ha – Cable Corridors (interconnecting cables + grid connection)
- Underground connection to the new National Grid Substation at Yaxley.
- Located near Yaxley, Brome, Eye, Gislingham, Mellis and Occold.

The project includes 40 years of operation, followed by a decommissioning phase. Construction is expected to begin in late 2028, lasting approximately 24 months.

EIA Approach and requirements

The study area refers to a series of local roads including A and B roads, and it is welcomed that the final agreement of the study area is to be discussed with NH as well as SCC. We note that the study area as discussed does not include reference to the A11, A14 or A47. Although these routes are at some distance, we consider that much of the construction traffic for the proposed project will be strategic in nature and will make use of one or more of these routes.

Potential effects on the wider SRN could be experienced in relation to construction traffic activity, even in cases where the works site might be at significant distance from the SRN. We will expect to see traffic flow forecasts for construction traffic flows and distribution, in order to identify any peak hour impacts on junctions on routes. It is also recommended that the applicant seeks to engage with NH regarding any proposals for Abnormal and Indivisible Loads (AIL) as part of the project as and when such information comes available for consultation.

In relation to Section 7.9 Traffic and access, we are in agreement regarding the methodology for gathering baseline information, which includes the use of WebTRIS data. We welcome that a Traffic and access chapter would be prepared, and that a Transport Assessment would be prepared which will inform the chapter. The proposed management plans for the construction and operational phases are welcomed and we would wish to be engaged in the review of measures within these documents.

We welcome the proposed use of the IEMA 2023 guidance as the appropriate basis for assessing highways impacts. We also recommend that reference should also be made to guidance and standards in the DMRB in terms of highways assessments. We recommend that reference is made to the DfT Circular 01/2022, which provides guidance regarding how the impact of the proposed development on the SRN should be assessed together with 'The strategic road network and the delivery of sustainable development (National Highways and the strategic road network)'.

DfT Circular 01/2022 recommends in Paragraph 50 that an opening year assessment is carried out, which is likely to be different to the typical scenarios including peak operation. It is also recommended that engagement takes place in order to reach agreement with local authorities regarding traffic growth and committed development.

We note that it is suggested within the Traffic and access scope and methodology that the assessment would scope in driver delay for the construction and decommissioning phases and scope out for the operational phase. However we recommend that traffic flow information is provided for all of these phases is provided in order to inform scoping in or out on a numerical basis.

We would wish to see a methodology and outputs for distribution and for traffic flows to be demonstrated on the local and SRN for all scenarios. This will provide us with an indication on any junction assessments that could be expected to be carried out. These assessments will be important in terms of establishing the extent of the requirement for traffic mitigation measures.

With regard to the potential for traffic surveys, any requirement in relation to the SRN is dependent upon the route assignment for trips, and so this would be subject to further discussion once SRN access points are established. Traffic data is available through WebTRIS although flows for minor arms on the local road network would be needed for a potential assessment. If any surveys are proposed on the SRN, this would require agreement from the NH Network Management Team in order to agree access.

We recommend that the applicant's consultant obtains the Personal Injury Accidents (PIA) data from the local highway authority based on the study area which should be agreed beforehand and include the relevant junctions linking to the SRN. The data should be inclusive of the full STATS-19 dataset including locations, timings and

causation, and it is important to note that the period from March 2020 until August 2021 (inclusive) will not be accepted due to the COVID-19 pandemic and therefore a longer period should be included.

We welcome that a Construction Traffic Management Plan (CTMP) is proposed as part of the application documentation. Significant focus should be placed on the CTMP which will be a key mitigation measure in terms of potential effects on the SRN. Similarly, the Abnormal Indivisible Load (AIL) Study should be informed by engagement between the applicant and NH Network Management on this area of work.

I hope that the above is clear and will allow you to proceed, if you need anything further, please do not hesitate to contact me.

Yours sincerely



Spatial Planner
National Highways
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