

**Job Title:** Sunnica Energy Farm DCO Scheme, Cambridge  
**Job No:** 2022-4937  
**File Ref:** CA4937-N01-DR-SM-Transport Note (221111)(220268477.1).docx  
**Date:** 11/11/2022

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**Subject:** **Sunnica Energy Farm – DCO Scheme**  
**Assessment of Transport Impacts at Federated Hermes Property Unit Trust Campus,**  
**Newmarket Road, Fordham, Cambridgeshire**

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## **Executive Summary**

Caneparo Associates has been appointed by Federated Hermes Property Unit Trust (FHPUT) to investigate the potential transport, access and parking impacts associated with Sunnica Energy Farm’s proposed energy farm and cable route on FHPUT’s biotech campus in Fordham, Cambridgeshire (the “Campus”). Sunnica Energy Farm’s proposals are the subject of a Development Consent Order (DCO) which includes wide-ranging compulsory purchase and temporary possession powers.

The DCO Scheme comprises an energy farm comprising solar PV and battery storage on land near Red Lodge, Suffolk and Chippenham, Cambridgeshire, and associated works. The DCO Scheme proposes to connect the above sites to the National Grid system at Burwell via a cable. It is proposed that a section of this cable will route on land at the rear of the Campus.

The DCO Scheme seeks wide-ranging powers over a substantial part of the Campus to authorise the installation of the cable and associated works with construction, maintenance and decommissioning access rights over an existing access through the Campus and a staff car park to the rear.

We are informed that any use by construction traffic of the Campus’s access road, disruption to that access and any loss of staff parking will have the potential to impact on the operations that take place at the Campus potentially resulting in delays to testing and the development of new medicines and the treatment of patients with rare medical conditions.

The Environmental Statement (ES) considers a number of alternative cable routing options but does not give clear reasons for selecting the proposed alignment to the north and east of the Campus, which would cause serious adverse impacts on the Campus, as opposed (for example)

an option which routes the cable to the west and between the Campus and the scheduled monument to the south, which would not cause such impacts.

The ES that has been submitted in support of the DCO Scheme does not include an assessment of the potential traffic, access and parking impacts on the operation of the Campus. The DCO application includes Access Rights and Cable Rights that could result in unconstrained numbers of HGV and other vehicle movements along the Campus access road and within the rear car park. Sunnica's Transport Assessment suggests this could involve up to 12 staff vehicle trips per day, 6 LGV trips per day and 148 HGV trips per day if the other access arrangements proposed as part of the DCO application, being dirt tracks, prove unavailable or unsuitable and the only viable access to the cable route and Sunnica West Sites A and B is via the Campus's tarmacked access road.

Furthermore, the DCO Scheme fails to consider how the existing strict security measures at the Campus will be maintained or operate if the access route through the Campus is used by Sunnica Energy Farm personnel and its vehicles.

We are informed that from a transport perspective, wherever the scale of use by Sunnica of the Campus's access road sits, the impacts would be as follows:

- If the access through the Campus is obstructed and staff or visitors are unable to access the Campus or that a delivery of important hazardous substances or materials is missed this would adversely affect operations that take place at the Campus.
- In addition, if the DCO Scheme results in the loss of staff car parking, this would result in a reduction in workforce as the existing staff parking provisions are heavily utilised and there are no other forms of suitable transport available to staff and visitors to the Campus.
- A reduction in workforce would result in the halting or pausing of operations.
- Even very short-term impacts will be potentially catastrophic for the activities that take place at the Campus.

We are instructed that FHPUT welcomes the direction of travel demonstrated by Sunnica Energy Farm's recently proposed revised access arrangements for the proposed cable route, which would

include the routing of all HGVs and large machinery through land to the north of the Campus and only a limited number of cars / light vans through the Campus. However, the Campus is not suited to conveying third party construction traffic of any scale and it is not clear why all such traffic (cars, light vans, HGVs and large machinery) cannot be routed via the proposed access to the north of the Campus. We are further instructed to explore with Sunnica whether these proposals can overcome FHPUT's concerns.

## **Introduction**

1. Caneparo Associates (CA) has been appointed by HPUT A Limited and HPUT B Limited as trustees of the Federated Hermes Property Unit Trust ("FHPUT") to investigate the potential transport, access and parking impacts associated with Sunnica Energy Farm's Development Consent Order application (the "DCO Scheme").
2. The DCO Scheme comprises a proposed energy farm comprising solar PV and battery storage on land near Red Lodge, Suffolk and Chippenham, Cambridgeshire and the associated installation of a cable to the rear of FHPUT's Campus (the "Campus") at Newmarket Road, Fordham, Cambridgeshire.
3. FHPUT owns the Campus comprising the freehold of the land and buildings lying to the east of the A142 Newmarket Road in Snailwell, Newmarket.
4. This Transport Note assesses the potential transport effects of the DCO Scheme on the Campus in relation to access and parking.
5. This note has been produced following a review of the following DCO Scheme documents:

| <b>Table 1: List of Key DCO Scheme Transport and Access Related Documents</b>                |   |  |
|--|---|--|
| <b>Document</b>  | <b>PINS Examination Library Reference</b> | <b>Electronic Filename (on PINS website)</b>   |
| ES Chapter 13 (Transport and Access)   | APP-045                                   | SEF_ES_6.1_Chapter_13_Transport and Access.pdf   |
| ES Appendix 1A (ES Scoping Report)   | APP-051                                   | SEF_ES_6.2_Appendix_1A_Sunnica Energy Farm Scoping Report.pdf                              |
| ES Chapter 4 (Alternatives and Design Evolution)   | APP-036                                   | SEF_ES_6.1_Chapter_4_Alternatives and Design Evolution.pdf                                 |
| ES Appendix 13B (Transport Assessment (TA))  | APP-117                                   | SEF_ES_6.2_Appendix_13B_Transport Assessment.pdf   |
| ES Appendix 13C (Framework Construction Traffic Management Plan (CTMP) and Travel Plan (TP)) | APP-118                                   | SEF_ES_6.2_Appendix_13C_Framework Construction Traffic Management Plan and Travel Plan.pdf |
| Access and Rights of Way Plan (ARWP) (Sheet 16) (IP (APFP) Regulation 5(2) (K))              | APP-008                                   | SEF_2.3_Access and Rights of Way Plans.pdf   |
| Land and Crown Land Plan (LCLP) (Sheet 16)   | APP-006                                   | SEF_2.1_Land and Crown Land Plans.pdf  |
| Figure 4-3 ES Pre-Application Scoping Cable Route Options                                    | APP-173                                   | SEF_ES_6.3_Figure 4-3 Cable Routes PreScoping.pdf  |
| Figure 9E 'PDA 5: Land at Snailwell Constraints'   | APP-054                                   | SEF_ES_6.2_Appendix_4A_Alternative Sites Assessment.pdf                                    |
| Sunnica West Site A and Site B Accesses Extract  | APP-153                                   | SEF_ES_6.3_Figure 3-14 Sunnica West Access.pdf   |

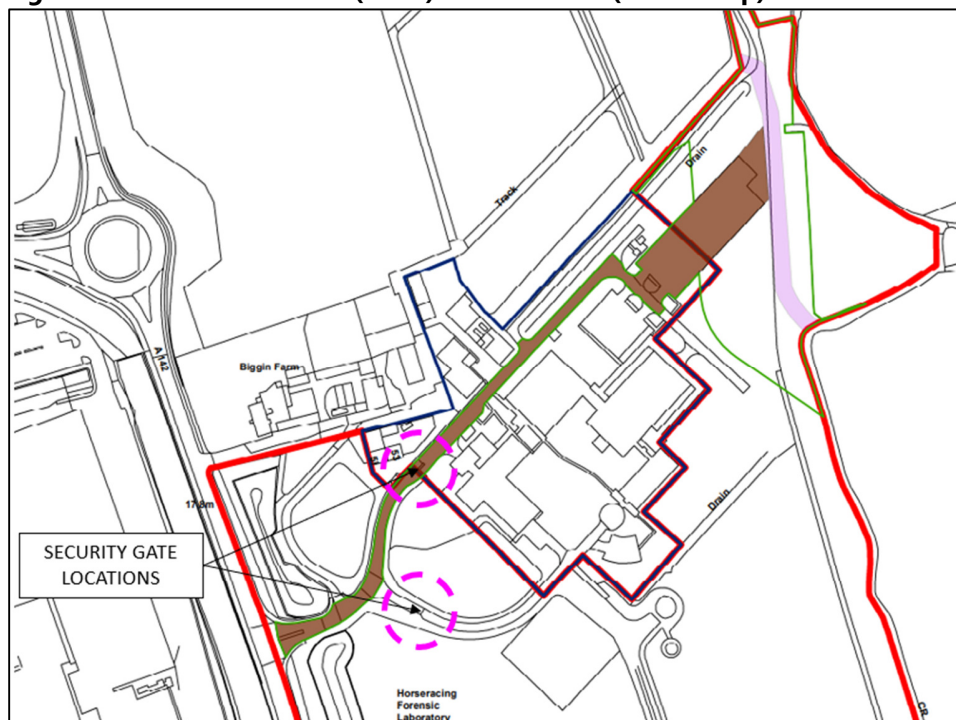
6. Local transport policy has been considered during the production of this note, where relevant.
7. In addition to the documents referred to above, this note refers to the Property Cost Estimation Plan (PCEP) (plan reference WSP\_SEF\_PCE\_Plan\_HPUT) prepared by WSP on Sunnica Energy Farm's behalf which has been provided to FHPUT.
8. This note therefore relies on information contained within the above referenced DCO Scheme documents and supplementary information provided by WSP on Sunnica Energy Farm's behalf and other associated information as highlighted later in this report.

9. Reference has also been made to email correspondence and discussions with WSP / Sunnica Energy Farm, the client team including FHPUT, Savills, and Ion Acoustics during the production of this note.
10. No discussions have taken place with the local highway or planning authorities.

### The Campus

11. The site that comprises the Campus is bounded by the A142, Newmarket Road to the west, Biggin Farm (including stables) and grazing / open / agricultural land to the north. The eastern edge of the site includes part of the River Snail. To the south of the Campus lies open / agricultural land.
12. The brown hatched area shown on the PCEP includes the vehicle access into the Campus from the A142, Newmarket Road. A marked-up extract of the PCEP is included in **Figure 1** below. This is the sole access route to the Campus from the local road network and is used by staff, visitors and by delivery and servicing personnel to access the Campus throughout the day, especially during the morning and evening commuter peak periods Mondays to Fridays.

**Figure 1: WSP SEF PCE Plan (PCEP) HPUT Extract (Marked Up)**



Source: WSP\_SEF\_PCE\_Plan\_HPUT (with CA Annotations)

13. I am advised that pedestrian crossing movements along this route are significant with staff / servicing and delivery personnel moving between various buildings and storage areas that are dotted around the Campus.
14. Security gates are located at the Campus as highlighted in Figure 1 above. These are the only entry and exit points into the facility.
15. The brown hatched area shown on the PCEP also includes a staff car park (comprising some 136 car parking spaces) to the rear of the Campus.
16. There are additional car parking areas at the Campus (not included in the brown hatched area).
17. There are circa 400 staff and personnel based at the Campus. The Campus is occupied between 06:00 and 22:00 Mondays to Sundays. The Campus is not occupied on Bank Holidays although instrumentation based at the Campus operates automatically, when required, 24 hours a day, all year round.
18. The majority of staff arrive at the Campus between 07:00 and 09:00 and depart between 16:00 and 18:00 Mondays to Fridays. A proportion of staff also access the Campus Saturdays and Sundays.
19. I am advised that given the rural nature of the surrounding area and that there are no public transport opportunities within the vicinity of the site the vast majority of staff, if not all staff, travel to and from the Campus by car. A significant proportion of staff car-share. As such, I understand the car parking provisions at the Campus, including the car park that is included in the brown hatched area on the PCEP, are heavily utilised between circa 07:00 and circa 18:00 Mondays to Fridays.
20. I understand from my discussions with FHPUT that if staff cannot access and / or park at the Campus the operations that take part at the Campus will be disrupted. The implications for any halting or pausing of the operations that take place at the facility are considered later in this note.
21. I am advised that the Campus is one of only six International Federation of Horseracing (IFHA) Reference Laboratories and the only one based in the UK. Furthermore, I understand that contracted turn-around-times mean that it is not possible for operations at the Campus to cease

for any period of time or provide the services from another location. I also understand that any halting or pausing of laboratory work would delay the development of new medicines and products and potentially create shortages in availability of medicines and therefore delays to the treatment of patients with rare medical conditions.

22. I am advised that around 30 deliveries are made to the Campus per day, on average. This includes the delivery of substances which are ordered automatically based on volume sensors. When deliveries are taking place, the access road marked brown on the PCEP is partially blocked for the duration of unloading (as the storage compound is located on the other side of the access road to the main facility). If access to the storage compound cannot be achieved because the access is blocked, I am advised that the delivery has to be cancelled and re-arranged to a later time, leaving the Campus and the operations that take place compromised and unable to function (noting delivery is based on a just-in-time supply).
23. The vast majority of deliveries to the Campus are made using small / light to medium goods vehicles.
24. General waste is collected from the Campus once per week by a 16 yard skip loader. Other regular waste collection events take place from Newmarket Road. Hazardous waste is collected twice per week using a light goods vehicle.
25. I am advised that it is rare for a delivery or collection to be made using a Heavy Goods Vehicle (HGV). I understand, special arrangements are made if a delivery or collection is to be made using an HGV in order to minimise the impact on access to the site, car parking, and the operations that take place at the Campus. I understand that when a delivery or collection by HGV needs to be arranged or when notification is received that an HGV is required to access the Campus, lab managers and associated staff are made aware of potential impacts on that given day and time. I further understand that when HGVs are required to access the Campus certain activities are either suspended, where possible, or have a delayed start, so not to invalidate any readings or results.
26. I am advised that a number of human drug testing activities are undertaken at the Campus which involve work of a forensic nature. In addition, some of the work undertaken at the Campus is subject to strict controls requiring a Controlled Drugs License. As such, all visitors to the Campus

(including deliveries) are therefore by prior arrangement only and access to the Campus via the security gates referred to above (highlighted in Figure 1 above) is strictly controlled / monitored.

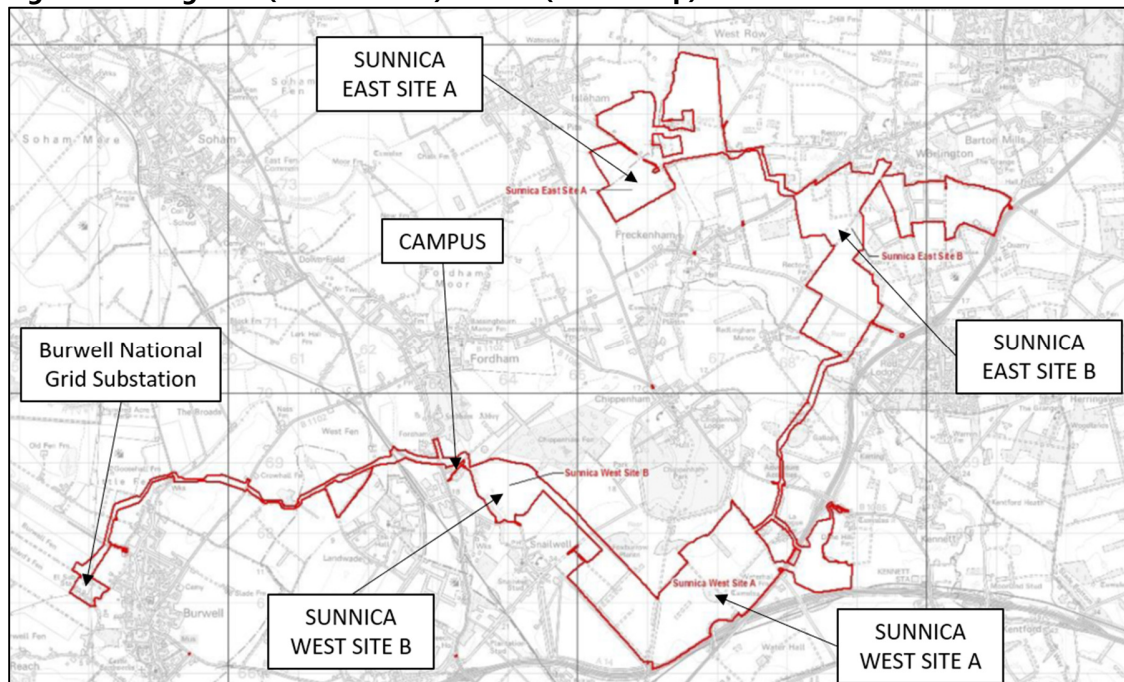
- 27. Regulatory training is required for all persons accessing the Campus.

**The DCO Scheme**

- 28. As highlighted earlier in this note, the DCO Scheme comprises a proposed energy farm comprising solar PV and battery storage on land near Red Lodge, Suffolk (defined in the TA as Sunnica East Site A and Site B) and land near Chippenham, Cambridgeshire (defined in the TA as Sunnica West Site A and Site B). Sunnica East Site A and Site B and Sunnica West Site A and Site B will connect to the National Grid system at Burwell via a cable.

- 29. Figure 1 of the TA shows the locations of the above sites. A marked-up extract of this figure with the location of the Campus highlighted is included in **Figure 2** below.

**Figure 2: TA Figure 1 (Site Location) Extract (Marked Up)**



*Source: Figure 1 of TA (With CA Annotations)*

- 30. The DCO Scheme seeks wide-ranging powers over a substantial part of the Campus (shown edged green on the plan included in Figure 2 above) to authorise the installation of a section of the



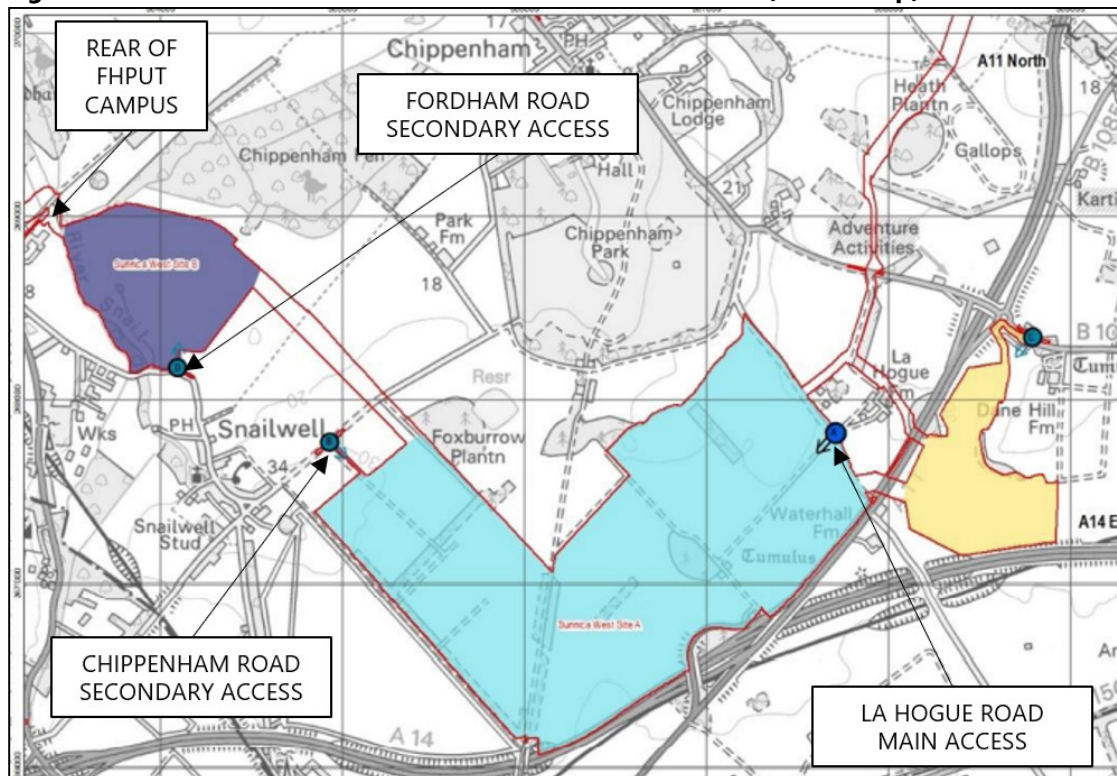
proposed cable on land at the eastern side of the Campus and associated works with construction, maintenance and decommissioning access rights over the existing access through the Campus described earlier in this note and shown hatched brown on Figure 1.

### Transport Comments on DCO Scheme

#### Access to Sunnica West Site A and Site B

31. Figure 5 of the TA indicates that the main access for the Sunnica West Site A and Site B will be from La Hogue Road which is located on the east side of Sunnica West Site A. The same figure shows two secondary access points; one on Chippenham Road to the north west of Sunnica West Site A and one on Fordham Road to the south of Sunnica West Site B. For ease of reference, **Figure 3** (below) shows the locations of these access points and the land to the rear of the Campus.

**Figure 3: Sunnica West Site A and Site B Site Accesses Extract (Marked Up)**



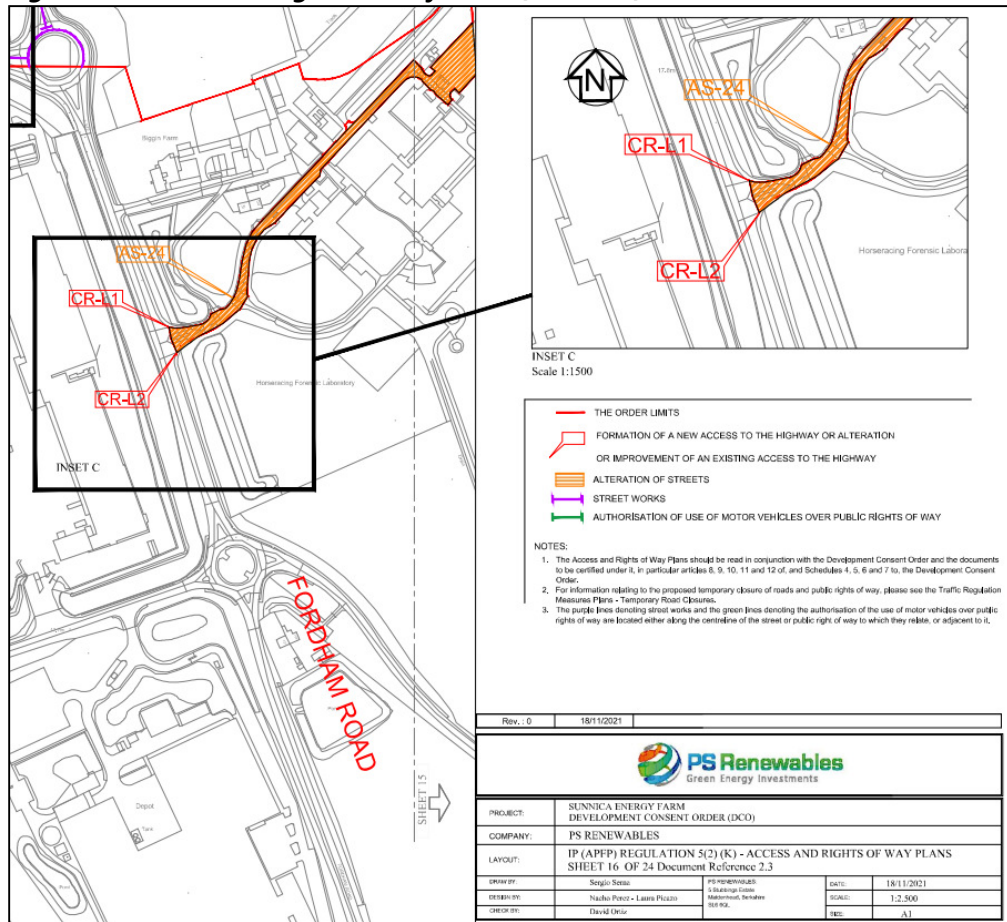
Source: TA Figure 5 (with CA Annotations)

32. Paragraph 5.4.7 of the TA states there will be 51 HGV deliveries per day (102 movements per day) to Sunnica West Site A and Site B during peak construction times.
33. Paragraph 5.4.9 of the TA states that the main access to the Sunnica West Site A and Site B is proposed to be from La Hogue Road and that to minimise the number of HGV movements on the local road network, internal routes from the main access will be used. It also states that where HGVs are unable to use internal routes, the secondary access points (described above and highlighted in Figure 8 above) will be used.
34. However, paragraph 3.2.4 and Table 3.2 of the TA indicates that Fordham Road and Chippenham Road (the roads where the secondary access points are proposed) are not recommended routes for HGVs (as defined by Cambridgeshire County Council's (CCC's)) and therefore, given the DCO Scheme includes Access Rights and Cable Rights over the Campus, that could result in an unconstrained number of HGVs and other vehicle movements along the Campus access road and within the rear car park, it is considered that there is the potential for the need to access Sunnica West Site A and Site B via the Campus.
35. The DCO Scheme does not consider the potential for the Sunnica West Site A and Site B to be accessed via the Campus. For the reasons set out in this note, the routing of construction vehicles associated with Sunnica West Site A and Site B along the Campus access road and rear car park is unacceptable.

#### **Access to Cable Installation**

36. Paragraph 5.4.21 of the TA states that the access locations associated with the construction of the cable are shown on the Access and Right of Way Plans (ARWP). Sheet 16 of the ARWP includes the proposed access route through the Campus. An extract from Sheet 16 of the ARWP is included in **Figure 4** below.

**Figure 4: Access and Rights of Way Plans (Sheet 16) Extract**



Source: DCO Application

37. Paragraph 5.4.20 of the TA states that on average there will be up to 23 HGV deliveries (46 vehicle movements) per day associated with the cable installation works. However, data included in Annex E of the TA (see table referenced 'Burwell Substation to Sunnica West A') indicates that during peak times there will be 23 HGV deliveries and 3 LGV deliveries per day, on average, during the cable installation works.
38. In addition to the above, paragraph 5.4.30 of the TA states that a maximum of 6 staff vehicles will access the cable installation works sites per day.
39. Table 6.2 of the TA indicates that the works to Sunnica West Site A and Site B and the cable installation works could take place in parallel. Therefore, if there are issues with internal routes, and the secondary access points off Fordham Road and Chippenham Road are found to be unsuitable for HGVs, permission to use the access off the A142 via the Campus for construction

vehicles associated with the cable installation works and Sunnica West Site A and Site B could be sought at a later date (via a revision to the submitted Framework Construction Traffic Management Plan (CTMP) and Travel Plan (TP), for example). This would be authorised through the DCO, which allows the Campus access route to be used for construction; maintenance and decommissioning. As shown in the table below, this could result in up to circa 12 staff vehicle trips per day, 6 LGV trips per day, and 148 HGV trips per day using the access through the Campus.

| <b>Table 2: Estimated Potential Construction Traffic Generation</b> |  |                               |                                  |
|---|--|-------------------------------|----------------------------------|
| <b>Works Description / Location of Works</b>                        | <b>Staff Vehicles Per Day</b>                    | <b>LGV Deliveries Per Day</b> | <b>HGV Deliveries Per Day</b>    |
| Cable Installation Works  | 6<br>(6 in and 6 out)                            | 3<br>(3 in and 3 out)         | 23<br>(23 in and 23 out)         |
| Sunnica West Site A and Site B                                      | 0<br>(Staff Car Park Accessed Via La Hogue Road) | 0                             | 51<br>(51 in and 51 out)         |
| <b>TOTAL</b>  | <b>6<br/>(6 in and 6 out)</b>                    | <b>3<br/>(3 in and 3 out)</b> | <b>74<br/>(74 in and 74 out)</b> |

40. The TA states at paragraphs 7.1.11 and 7.1.13 that the delivery routes for both the works to the Sunnica West Site A and Site B and the cable installation sites cannot be determined at this time and that for the cable installation works, HGV deliveries will vary depending on the section that is being built. Therefore, the number of traffic movements that could occur via the Campus could be at the level stated in the table above given the wide-ranging powers that are being sought along the Campus access road and rear car park.

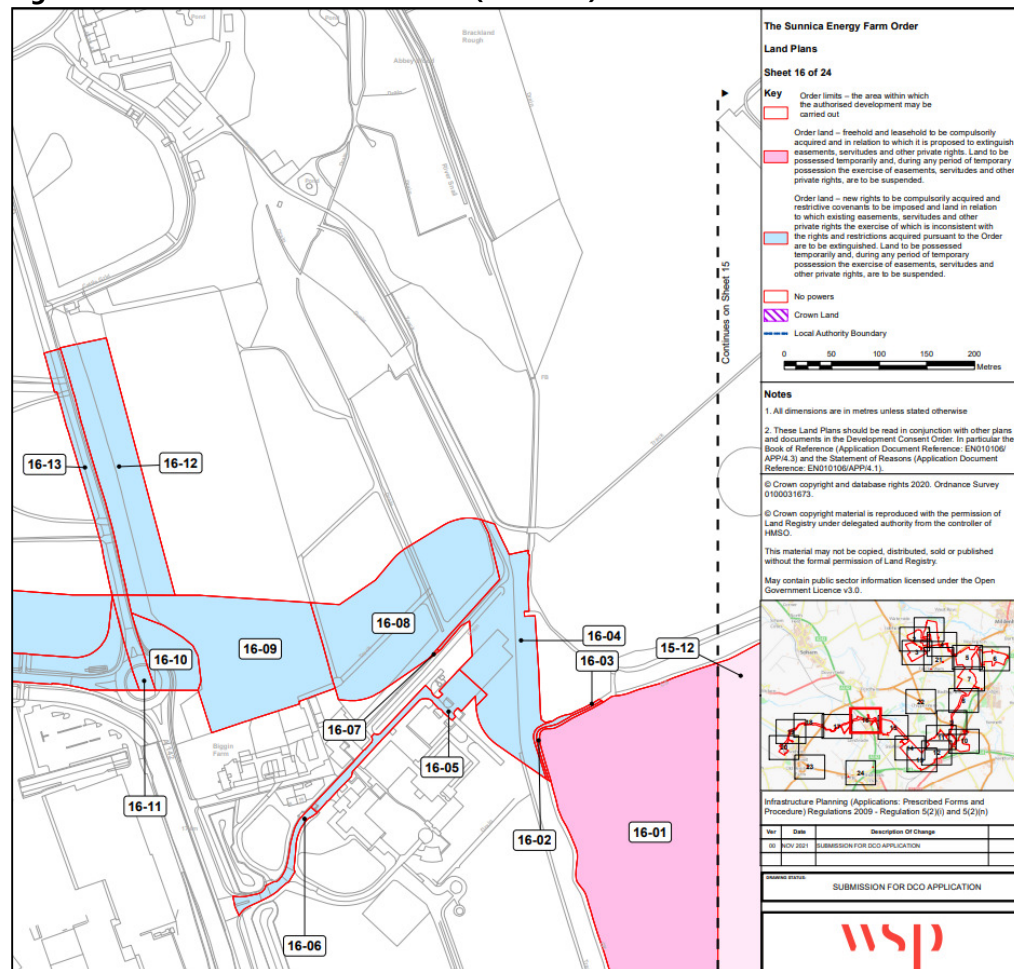
#### **Access to Sunnica West Site A Sub-Station**

41. The above assessment assumes the proposed sub-station at Sunnica West Site A would be accessed via the main access off La Hogue Road if the DCO Scheme is approved. If the proposed sub-station at Sunnica West Site A needs to be accessed via the Campus, which may be the case if it is found that the main and secondary access points are not suitable, significantly more traffic movements than that estimated above could occur on the route through the Campus.

### Framework Construction Traffic Management Plan and Travel Plan

42. It is noted that the TA makes several references to the Framework CTMP and TP included in Appendix 13C of the ES.
43. The Framework CTMP and TP states at paragraph 1.2.3: "...*certain details remain to be developed as the scheme progresses into detailed design*". As such, there is uncertainty surrounding the final / actual DCO Scheme requirements and therefore what the impact might be on the Campus.
44. Furthermore, paragraph 5.1.4 states: "*The final CTMP and TP is expected to identify any changes to the information provided within this section. This could include changes in size of the site accesses, changes in vehicle sizes and types proposed to enter / egress the site accesses, confirmation of the crane vehicles and routes to be used...*".
45. Given the above, there is scope for the access strategy to change if the DCO Scheme is approved. The proposed access arrangements are therefore unconstrained. Any changes to the access arrangements could include increased utilisation of the access through the Campus and therefore additional disruption to the Campus and the operations that take place there. It is noted that the key on Sheet 16 of the LCLP (extract include in **Figure 5** below) states that for the covered part of the Campus new rights are to be compulsorily acquired and restrictive covenants are to be imposed and that existing easements, servitudes and other private rights and restrictions are to be extinguished. Therefore, if the DCO is approved, access to the Campus will likely be disrupted for the duration of the construction phase and, potentially, during the maintenance and decommissioning phases. As highlighted later in this note, the DCO Scheme does not explain or consider how the Campus will continue to operate during the construction, operational and decommissioning phases of the development.

**Figure 5: Land and Crown Land Plans (Sheet 16) Extract**



Source: DCO Application

46. In addition, to all the permanent rights being acquired, the DCO Scheme would allow Sunnica Energy Farm to enter on and take temporary possession anywhere within the Order Limits (see land bounded in red on the LCLP / Figure 5 above) and enable the construction of the authorised development in order to remove anything on the land, construct temporary works, structures and buildings etc in connection with the authorised development.
47. With regard to the maintenance phase, paragraph 5.1.4 of the Framework CTMP and TP states that the accesses for the cable (which includes the access via the Campus) are not required during the operational phase and therefore these access points will be reinstated. However, the same paragraph states that the Applicant requires the ability to reinstate and use these access points should it be necessary to carry out maintenance and therefore there is the potential for further

disruption to occur to the Campus during the operational phase of the development. The access arrangements during the operational phase (to carry out maintenance works) are therefore also unconstrained.

48. In terms of the decommissioning phase, which is anticipated to occur around 40 years after installation (according to the DCO Scheme), the TA and ES state that the impacts will be no greater than those that are associated with the construction phase and therefore there is the potential for further disruption to the operations that take place at the Campus during the decommissioning phase at a scale similar to that which could occur during the construction phase.

#### **DCO Scheme Site Access Review**

49. Section 5.3 of the Framework CTMP and TP summarises the site access review for the cable installation works with details included in Annex C of the document.
50. The access through the Campus is considered on page 162 of the Framework CTMP and TP. It states that the access to the Campus off the A142, Newmarket Road, can accommodate the entry and egress movements of a 16.5m articulated vehicle and that as such no alterations to the access or traffic management measures are proposed during the construction or operational phases.
51. However, no swept path analysis has been provided for the Campus site access junction on the A142, Newmarket Road, to confirm this. Furthermore, no swept path analysis has been provided for the internal access route through the Campus to demonstrate that HGV and existing vehicle movements can be accommodated safely and efficiently with no disruption to the operations that take place at the Campus or the staff car park at the rear of the Campus. Furthermore, the ARWP, as currently drafted, allows the access through the Campus to be altered. The DCO Scheme does not define the extent of potential alteration works and therefore the potential impacts on access to the Campus and staff car parking provisions.
52. The access route through the Campus varies in width. The section of the access route through the Campus located close to the interface with the A142, Newmarket Road, is wide enough for a car to pass an HGV. However, the access route narrows to circa 6 metres as it extends into the Campus up to the security gate. In theory, the section of access route between the A142, Newmarket Road, and the security gate is wide enough for a car to pass an HGV. However, the

access route incorporates two bends located close together and therefore swept path assessments should be carried out to demonstrate that the access route would operate safely.

53. The Framework CTMP and TP does not include any swept path assessments for the access route through the Campus and therefore does not demonstrate that an HGV would be able to manoeuvre along the access without causing disruption to the operations that take place at the Campus, impact on the security gate or the car park to the rear of the Campus.
54. The Framework CTMP and TP does not explain how staff / personnel and goods vehicle drivers accessing the cable installation works area will obtain security clearance. As highlighted earlier in this note, regulatory training is required for all persons wishing to route through the Campus.
55. If an HGV driver is denied security clearance after they have turned off the A142, Newmarket Road, at the access to the Campus it may be necessary for the driver to reverse the HGV back along the access route and onto the A142 (given there are no formal turning facilities between the security gates and the access onto the A142) which would compromise highway safety, and potentially lead to delays to deliveries and staff and visitors accessing the Campus.
56. the Framework CTMP and TP does not consider how the Campus will operate and be accessed by Campus staff, visitors and delivery and servicing personnel during the construction, operational and decommissioning phases of the DCO Scheme. As highlighted earlier, the on-site instrumentation is operational 24 hours, 365 days a year.
57. Under the current proposals, there is the potential for the site access and / or the entire rear staff car park to be closed to staff and visitors if the DCO Scheme is permitted. I am advised that a reduction in car parking provisions would result in a reduction in workforce which in turn would result in the pausing or halting of the operations that take place at the Campus, leading to delays to the testing and development of new medicines and the treatment of patients with rare medical conditions.
58. As highlighted above, the DCO Scheme has the potential to generate a significant number of HGV and other vehicle movements along the access through the Campus and within the rear car park.



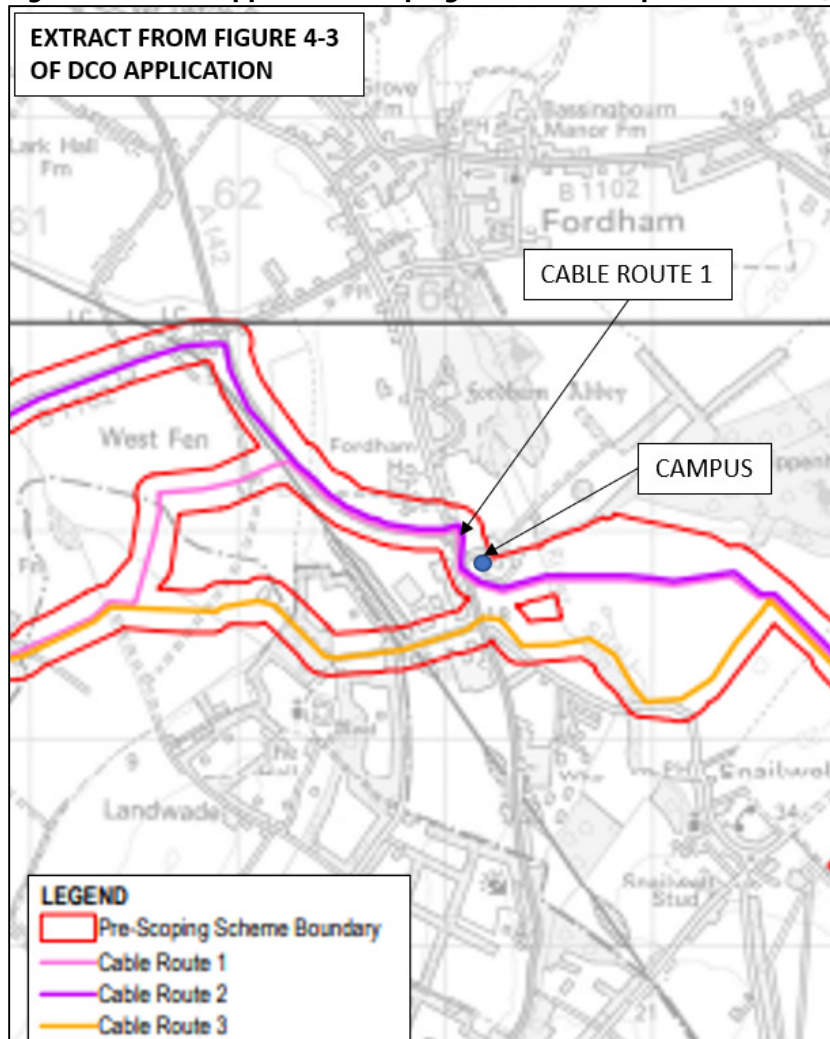
59. These movements have the potential to increase the risk of conflict between vehicles and staff crossing from one part of the facility to the other and impacting on the delivery of hazardous substances or materials that are essential to the operation of the Campus.
60. If deliveries of hazardous substances or other important materials are missed as a result of the access being obstructed by an HGV or other vehicle associated with the DCO Scheme, the operations that take place at the Campus would be interrupted resulting in delays to the testing and development of new medicines and the treatment of patients with rare medical conditions.
61. If any significant maintenance works are required to the cable installation once it has been installed and this maintenance work was to require space within the car park located within the brown hatched area on the PCEP this may disrupt access to the facility for staff, visitors and delivery and servicing personnel leading to the halting or pausing of on-site operations resulting in delays to testing and the treatment of patients with rare medical conditions.

## **Transport Assessment of Alternative Cable Routes and Access Arrangements**

### **Alternative Cable Route Options**

62. The ES appraises three potential options for the cable route alignment. These routes are shown in Figure 4-3 of Chapter 4 of the ES. A marked-up extract of Figure 4-3 of the ES is included in **Figure 6** below.

**Figure 6: ES Pre-Application Scoping Cable Route Options Extract (Marked Up)**



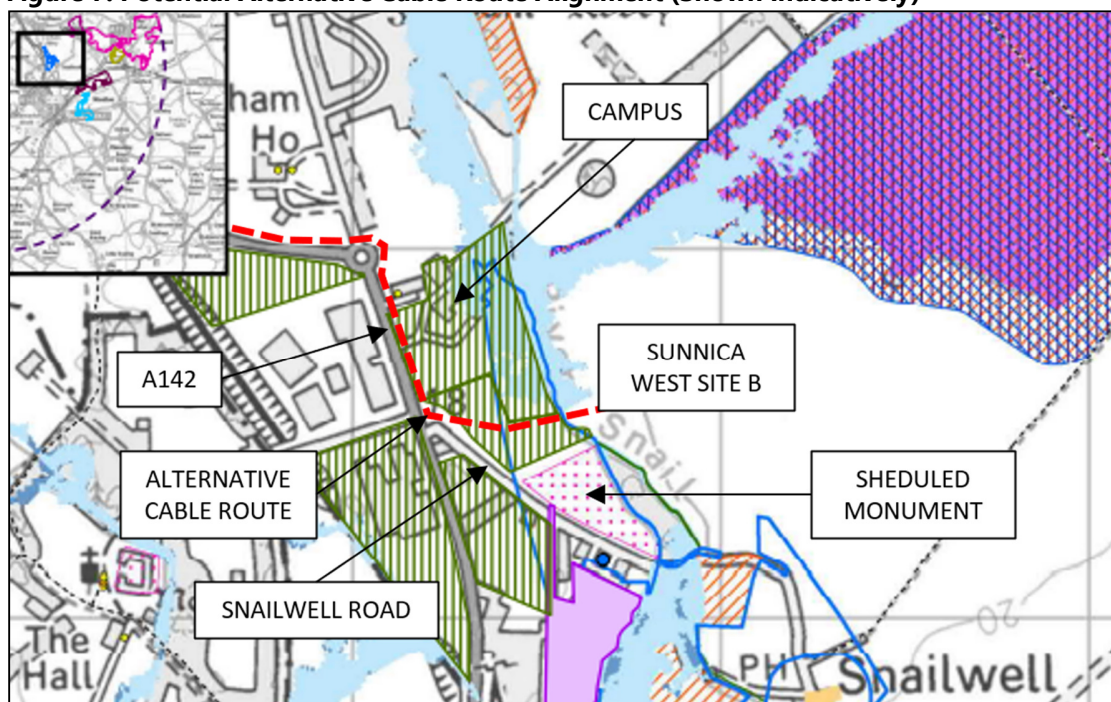
Source: DCO Application (with CA Annotations)

63. Option 1 was selected as the preferred option. As is apparent from the figure above, Option 1 (shown in light pink) ran to the west and south of the Campus.
64. Paragraph 4.8.7 of the ES states that the cable route alignment was amended in response to the EIA Scoping process to avoid the sewage treatment works to the north of Burwell. Paragraphs 4.8.8 and 4.8.9 provide additional reasons for amending the cable route alignment. However, these mainly relate to the railway crossing which is to the west of the Campus.
65. Rather than pursuing Option 1, the DCO Scheme proposes an alternative cable route, which runs to the north of the Campus and requires access through the Campus. The DCO Scheme fails to

explain in detail why the preferred cable route alignment was amended to route to the north of the Campus as currently proposed.

66. For reasons which are not apparent, the DCO Scheme fails to consider or assess in detail an option where the cable route runs parallel to the A142, Newmark Road, (on the east or west side of the road) between the roundabout junction of the A142, Newmarket Road, and Newmarket Road (located to the north west of the Campus) and the junction of the A142, Newmarket Road, and Snailwell Road before turning east towards the River Snail and Sunnica West Site B between the 'Scheduled Monument' and the Campus.
67. The above alternative cable route is shown indicatively on a marked-up version of Figure 9E 'PDA5: Land at Snailwell Constraints' (of Annex D (Assessment Mapping), ES Appendix 4A (Alternative Sites Assessment)) in **Figure 7** below.

**Figure 7: Potential Alternative Cable Route Alignment (Shown Indicatively)**



Source: DCO Application (with CA Annotations)

68. If the cable was to route as shown in Figure 7 above and access was achievable from Sunnica West Site B and / or from Snailwell Road the access route via the Campus would no longer be required. This would remove the potential for the DCO Scheme to disrupt the operations that take place at the Campus.

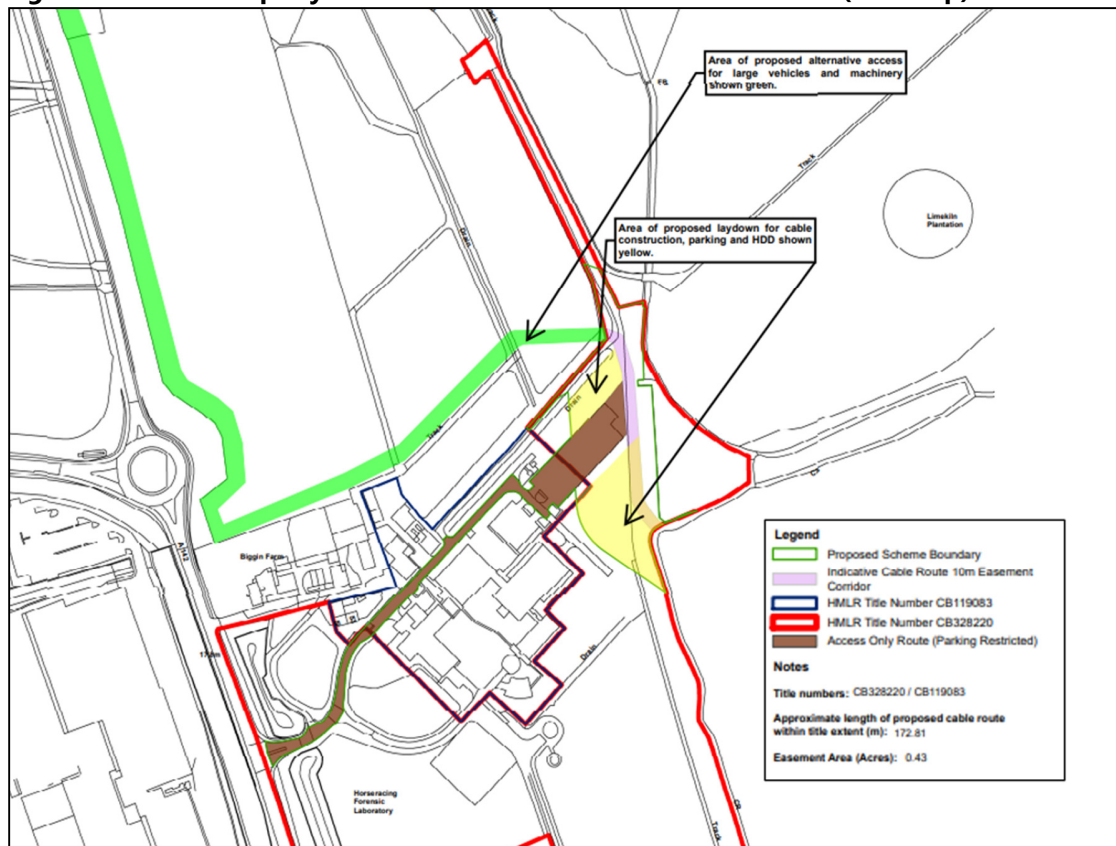
### **Alternative Access Option for Proposed Cable Route**

69. In terms of access to the currently proposed cable route, the DCO fails to consider or assess in sufficient detail the option of routing all construction, maintenance and decommissioning vehicles via a route through the area of land to the north of the Campus.
70. This is despite the Framework CTMP and TP identifying an existing field access located to the north of the roundabout junction of Newmarket Road and the A142. This access point is referenced 'Cable Route Access Location K' in the DCO Scheme documents and an access route via this field access has been accounted for in the Land and Crown Land Plans (Sheet 16) an extract of which is shown in Figure 3 above.
71. The DCO application fails to adequately demonstrate that construction, maintenance and decommissioning vehicles would not be able to utilise Cable Route Access Location K instead of the proposed access route through the Campus.

### **Transport Assessment of Supplementary Information**

72. WSP has circulated a revised PCEP on behalf of Sunnica Energy Farm in response to a number of queries that have been raised by FHPUT regarding the currently proposed access route through the Campus shown in the DCO Scheme. A marked-up extract of the revised PCEP is shown in **Figure 8** below.

**Figure 8: WSP's 'Property Cost Estimation Plan Sheet 1 of 1' Extract (Mark-Up)**



Source: WSP via Email 20.10.22

73. With reference to the above Figure, Sunnica Energy Farm's revised proposals, whilst not yet secured in any way, appear to be as follows:
- Areas for construction laydown and parking for Sunnica vehicles are coloured yellow (within an area currently the subject of proposed Access Rights) to the north and south of the Campus car park hatched brown (an area currently the subject of proposed Access Rights).
  - All HGVs and large machinery are to be routed via the Cable Route Access Location K referred to above and the area of land located to the north of the Campus (shown via the green line on the above Figure) instead of routing HGVs and large machinery through the Campus.
  - Only cars / light vans would use the proposed access route through the Campus to access the laydown and parking areas coloured yellow.

- Sunnica Energy Farm has indicated that a maximum of 15 cars / light vans (up to a maximum gross weight of 3.5 tonnes) would route through the Campus.
  - Sunnica Energy Farm has indicated that the revised arrangements would not require the use of any existing Campus car parking bays, all of which would remain available for use by the Campus throughout all construction, operation, and decommissioning of the DCO Scheme.
  - Sunnica Energy Farm has indicated that HGVs and large machinery would access the proposed cable installation works laydown and parking areas via the cable route corridor coloured purple on the revised PCEP, avoiding the need for HGVs and large machinery to be routed via the access through the Campus and the Campus car park to the rear.
  - Sunnica Energy Farm has indicated that there is to be no parking of vehicles associated with the DCO Scheme on the access route through the Campus or rear car park hatched brown on the revised PCEP.
74. The Campus is not suited to conveying third party construction traffic of any scale and it is not clear why all such traffic (cars, light vans and HGVs) cannot be routed via the access route to the north of the Campus shown green on the Figure above and the revised PCEP. Even so, we are instructed by FHPUT to continue to engage with Sunnica Energy Farm in an attempt to explore whether these proposals are sufficient to overcome its objection.
75. Given the DCO application and the Outline CTMP and Travel Plan includes caveats that would enable Sunnica Energy Farm to re-evaluate the access arrangements if the DCO Scheme is approved and that Sunnica Energy Farm are not proposing to remove the access route via the Campus entirely, there remains the potential for HGVs and cars / light vans to route via the Campus and for the car park to the rear to be closed to staff which would result in significant disruption to the operations that occur at the Campus.
76. As mentioned earlier in this note, the DCO Scheme fails to consider or assess in detail the potential impacts of the development proposals on the operations that take place at the Campus if access to the proposed cable route can only be achieved via the proposed route through the Campus.

77. The DCO Scheme therefore fails to consider or assess in detail the unconstrained access arrangements that are proposed at the Campus. This is a significant omission for the reasons contained within this note.

## **Summary**

### **Deficiencies in Transport Assessment**

78. In summary, the DCO Scheme fails to provide sufficient information regarding the proposed access and spatial requirements at the Campus and therefore to consider or assess the potential impact on the operations that are conducted at the Campus in adequate detail.
79. The DCO Scheme is deficient in a number of respects, including:
- The DCO Scheme fails to provide a detailed assessment of the potential traffic, access and parking effects on the Campus.
  - It therefore fails to demonstrate that the proposed unconstrained access arrangements would not disrupt access to the Campus for staff, visitors or deliveries, or access to the staff parking areas and the operations that take place at the Campus during the construction, operational and decommissioning phases of the DCO Scheme.
  - It fails to consider in detail the impact of the loss of staff car parking on access to the Campus and what the impact would be on the operations that take place at the facility if a reduction in workforce was to result in the loss of on-site car parking for staff.
  - It does not include plans showing the spatial arrangements for plant / storage areas and large machinery at the Campus during the construction, operational and decommissioning phases of the DCO Scheme for the unconstrained access arrangements that are proposed.
  - It does not provide a profile of vehicle movements and types requiring access via the Campus throughout the construction, operational and decommissioning phases of the DCO Scheme.
  - It does not include plans demonstrating the access route via the Campus is of sufficient width to accommodate two-way traffic comprising HGV and large machinery use during the construction, operational and decommissioning phases of the DCO Scheme.

- It fails to provide swept path analysis for all vehicles that would require access through the Campus.
- The DCO Scheme would allow Sunnica Energy to make alterations to the access and staff car park at the Campus at any time and for all time. It does not describe what these might be and fails to assess the impact these potential alterations would have on access to the Campus and staff parking.
- It fails to assess the impacts of the DCO Scheme on the Campus if access through the Campus is required for longer than assumed by Sunnica Energy Farm.
- It fails to consider how the existing security measures at the Campus will be maintained or operate if the access route through the Campus is used by Sunnica Energy Farm personnel and its vehicles.
- It fails to consider the potential impact of the proposals (including the unconstrained access arrangements) on the delivery of hazardous materials to the Campus.

### **Potential Impacts**

80. As highlighted throughout this note, the DCO Scheme includes unconstrained access arrangements that could potentially result in a significant number of HGV and other vehicle movements along the route through the Campus and rear staff car park.
81. If the rear car park was to be closed to staff this would result in a reduction in available parking which would result in a reduction in workforce. I am advised that a reduction in workforce would result in the pausing or halting of the operations that take place at the Campus leading to delays to the testing and development of new medicines and the treatment of patients with rare medical conditions.
82. The DCO Scheme also have the potential to increase the risk of conflict between vehicles and staff crossing from one part of the Campus to the other and impacting on the delivery of hazardous substances or materials that are essential to the operation of the Campus.
83. If deliveries of hazardous substances or other important materials are missed as a result of the access being obstructed by an HGV or other vehicle associated with the DCO proposals, the



operations that take place at the Campus would be further interrupted resulting in further delays to the testing and development of new medicines and the treatment of patients.

## **Conclusions**

84. Based on information included within the DCO Scheme, I consider that the proposed unconstrained access arrangements and the associated potential traffic generation, vehicle parking, loading and unloading requirements, and machinery and materials storage requirements associated with the DCO Scheme have the potential to result in significant disruption to the operations that take place at the Campus which would lead to delays to the testing and development of new medicines and the treatment of patients with rare medical conditions.