

Sunnica Energy Farm EN010106

Suffolk County Council Comments on the Applicant's Response to Relevant Representations

Deadline 2

11 November 2022

Preamble

The Council is submitting these comments on the Applicant's response to its Relevant Representations in order to set out that, in most instances, the issues raised by in Relevant Representations have been further detailed and largely overtaken by the joint Local Impact Report (LIR) [REP1-024]. As a general point, several matters have been picked up by Examining Authorities Questions (ExQs) and, in many cases, the Council and the Applicant are pursuing further discussions to resolve some of these issues.

This submission does not intend to provide a comprehensive response to all points because at this point in the examination it is likely to be more useful to address the matters in both parties' responses to ExQs, at Issue-Specific Hearings (ISHs), in the Statements of Common Ground (SoCGs) or other kinds of written submission and in any case by reference to the LIR rather than Relevant Representations.

Suffolk County Council (SCC)'s Comments on the Applicant's Response to Relevant Representations

Applicant's Ref.	Theme	Issue	Summary of issue raised	Applicant's response	SCC's comments
SCC-1	Other	Development consent	SCC is unable to support the proposal as it stands and considers that development consent should not be granted for the proposal as submitted.	This comment is noted. However, the Applicant respectfully disagrees and considers that development consent should be granted for the Scheme. The Scheme will be a critical part of the development of the UK's portfolio of large-scale solar generation required to decarbonise its energy supply quickly and provide secure and affordable energy supplies. The Applicant will continue to work with Suffolk County Council and seek to address its concerns.	See the executive summary (para 1.1-1.3) of the joint LIR [REP1-024] for further details on impacts and the collective position of the Councils.
SCC-2	Renewable energy and climate change	Local authority policy	In general, SCC has adopted a policy of being supportive in principle to renewable and low carbon energy generation schemes, while working to ensure that the impacts of these schemes are suitably minimised.	This comment is noted. The impacts of the Scheme have been reduced and minimised through the Environmental Impact Assessment process.	The joint LIR sets out the Council's view of impacts the development and identifies opportunities for impacts to be further minimised.
SCC-3	EIA process	Assessment	The draft DCO is unacceptable as several key assessments are inadequate, making it impossible for a decision-maker to evaluate the significance and degree of impacts.	The Applicant respectfully disagrees with SCC and considers that its application is adequate and gives a clear indication of the benefits and impacts of the Scheme. However, the Applicant is currently undertaking further engagement with SCC in order to understand its concerns and to allow the Council to elucidate the additional evidence requested.	SCC awaits further engagement on the draft DCO.

SCC-4	EIA process	Assessment	The lack of precision in assessments, if not corrected, would also cause challenges in the post-consent detailed design phase and risk confusion over the limits of materiality for any proposed changes.	The Applicant is currently undertaking further engagement with SCC in order to understand its concerns and to elucidate the additional evidence requested. However, the Applicant considers that the assessment is robust and the mechanisms for approval of detailed mitigation measures sufficient.	The joint LIR details where further information is required and where officers find the currently supplied information to be insufficient. SCC looks forward to further engagement with the Applicant.
SCC-5	Other	Examination process	SCC suggest that a date should not be set for a Preliminary Meeting until an action plan to address the evidential issues has been agreed between the applicant and the local authorities.	This comment is noted. However, the Applicant considers that no such action plan is necessary.	Overtaken by events.
SCC-6	Design	Scale	SCC remains concerned about the scale of this particular proposal, both physically and temporally, and the resulting impacts, which will be explored fully in the Local Impact Report.	This comment is noted. The Statement of Need [APP-260] builds upon the case for need established in the National Policy Statements (NPSs) for the urgent development of low carbon electricity generation, and sets out the need for a rapid increase in low carbon electricity generation capacity in Great Britain to meet decarbonisation obligations, and the critical role that large-scale solar schemes will play in meeting that need.	<p>The Council does not dispute the case for need established in the NPSs, but maintains that this proposal is a particularly large example of grid-scale solar and simply observes that this is relevant for a number of different impacts.</p> <p>Refer to relevant sections of the joint LIR for the Council's view on impacts during construction, operation, and decommissioning phases. Particularly sections on ecology and biodiversity and landscape and visual amenity impacts (8 and 10 respectively).</p>

					Para 1.2 outlines a summary of the land parcels the Councils recommend to remove to address the scale and magnitude of impacts of the developable area.
SCC-7	Operations	Operating life	SCC considers that the proposed lifespan of the project of 40 years, and the consequent temporal accumulation of adverse effects, has not been justified in the application nor demonstrated to be reasonable and appropriate.	Refer to RR SCC-52 in this table.	No response required.
SCC-8	Design	Design process	SCC is concerned that insufficient regard has been had to the mitigation hierarchy, and that all reasonable efforts have not been made to avoid, prevent, and reduce impacts, before turning to mitigation or compensatory/offsetting measures.	The Applicant respectfully disagrees with this comment. The mitigation hierarchy has been followed throughout design and assessment of the Scheme and all efforts have been made to avoid, prevent and reduce impacts before turning to mitigation or compensatory/offsetting measures. For example, a number of areas (over 30% of the Scheme area) have been left out of the developable area of the Scheme in order to avoid impacts to local residents, archaeology and biodiversity.	This comment is noted. Refer to para 1.2 of the joint LIR for the Councils position for a summary of the areas where insufficient regard has been given to the mitigation hierarchy and thereby where the land parcels are recommended to be removed from the developable area.
SCC-9	Design	Mitigation	SCC is concerned that residual adverse impacts have not been minimised to the greatest extent or offset where further mitigation is not practicable.	The Applicant respectfully disagrees with this comment and considers that all impacts have been minimised and offset to the greatest extent practicable. The Applicant is currently undertaking further engagement with SCC in order to elucidate the additional evidence requested by SCC.	Refer to SCC-8, above, in this table.

SCC-10	EIA process	Assessment	<p>SCC considers the current low quality of assessments and evidence within the Environmental Statement (ES) by the Applicant on a number of topics to be unacceptable: many of the assessments are lacking crucial information or are not sound enough to provide useful conclusions on impacts. Consequently, the mitigation package proposed is insufficient and not evidence based - some of the impacts anticipated by SCC are not mitigated at all, whilst, where mitigation is proposed, it often lacks ambition.</p>	<p>The Applicant respectfully disagrees with this comment and considers that the scope of its assessments and the mitigation strategies proposed are robust, including detailed requirements that are specific to the Scheme's location and impacts.</p> <p>The Applicant is currently undertaking further engagement with SCC in order to understand its concerns and to elucidate the additional evidence requested.</p>	<p>Refer to relevant sections of the joint LIR for their assessed positive, neutral, and negative impacts during construction, operation, and decommissioning phases, required mitigation as well as requested obligations and requirements on each topic area.</p>
SCC-11	Landscape and visual amenity	Assessment	<p>The scale, longevity and geographical distribution of the proposed development are likely to result in significant adverse effects as a result of intra-cumulative and accumulated impacts. SCC is concerned that, due to the way evidence is presented the ES assessment tends to under-estimate impacts. Mitigation proposals are not sufficiently tailored across a variety of landscape character types, and are not ambitious enough to sufficiently deal with the degree of harm caused by the project.</p>	<p>The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and neighbourhood scales to local landscape character areas defined by the Applicant. It is acknowledged that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character type (LT) defined within the Suffolk Landscape Character Assessment 2010 – for further information, please refer to Appendix 10D - Published Landscape</p>	<p>SCC notes that section 10 of the joint LIR [REP1-024] sets out the Councils' concerns in more detail, and intends to discuss this issue (particularly mitigation proposals) in more detail with the Applicant.</p>

				<p>Character Extracts of the Environmental Statement [APP-103].</p> <p>Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices provides a detailed assessment of landscape and visual effects on each receptor. This includes an assessment of landscape effects at different scales and on sequential views from roads and public rights of way accounting for the different sites, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape experienced along the route and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition.</p> <p>Regarding the longevity of impacts, as noted in paragraph 10.3.6 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], the following terminology and durations have</p>	
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				<p>been used for the landscape and visual assessment:</p> <ul style="list-style-type: none"> a. Short term durations are considered to be two years or less; b. medium term durations are considered to be between two and ten years; and c. long term durations are considered to be more than ten years. <p>Paragraph 10.3.7 states that the Local Planning Authority (LPA) response to engagement with the Applicant (17 February 2020) noted these terms and durations were acceptable.</p> <p>To draw distinctions between the duration and permanence of effects, the following assessment years were considered:</p> <ul style="list-style-type: none"> a. Scheme construction (winter); b. Scheme operation year 1 (earliest 2025) (winter); <p>Scheme operation year 15 (earliest 2040), (summer); and sites, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape experienced along the route and views of the landscape.</p>	
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				<p>This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition.</p> <p>Regarding the longevity of impacts, as noted in paragraph 10.3.6 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042], the following terminology and durations have been used for the landscape and visual assessment:</p> <ul style="list-style-type: none"> a. Short term durations are considered to be two years or less; b. medium term durations are considered to be between two and ten years; and c. long term durations are considered to be more than ten years. <p>Paragraph 10.3.7 states that the Local Planning Authority (LPA) response to engagement with the Applicant (17 February 2020) noted these terms and durations were acceptable.</p> <p>To draw distinctions between the duration and permanence of effects, the following assessment years were considered:</p> <ul style="list-style-type: none"> a. Scheme construction (winter); 	
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				<ul style="list-style-type: none"> b. Scheme operation year 1 (earliest 2025) (winter); c. Scheme operation year 15 (earliest 2040), (summer); and d. Scheme decommissioning (earliest 2065), (summer). <p>This is in line with the methodology set out in Appendix 10C of the Environmental Statement [APP-102] and the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (paragraph 3.22).</p> <p>Effects on some receptors would be significant at construction and year 1 of operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G of the Environmental Statement [APP-106].</p> <p>The Scheme has been designed to retain the existing landscape pattern and features as far as possible and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change, the majority of key characteristics will be retained. For example, within the Rolling Estate Chalklands landscape character type (LT), the large uniform fields</p>	
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				<p>enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages with flint and thatch vernacular houses and many new large “prestige” homes in villages will not be altered. Further information is set out in the Landscape and Ecology Management Plan included as Appendix 10I of the ES [REF-108].</p> <p>With regard to ecology and nature conservation, consideration is given to specific receptors present across the multiple sites and assesses the Scheme wide impacts within the Order limits. Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the rationale for habitat creation, including how it forms a coherent nature network across the multiple sites. For example, paragraph 1.7.29 sets out how the Scheme will align with and contribute to Buglife’s B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators.</p>	
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				Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long-term management will be set out in the detailed LEMP to be approved by the local planning authority at the detailed design stage.	
SCC-12	Landscape and visual amenity	Assessment	SCC expects the Applicant to provide a more thorough presentation of key areas of impact, and to work with the local authorities to reduce these impacts on the most sensitive receptors by redesigning elements of the scheme and propose more ambitious mitigation proposals.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices [APP-100 to APP-108] provide a thorough and detailed assessment of the likely effects of the Scheme on specifically considered landscape and visual receptors and appropriate mitigation which takes account of the surroundings of the Scheme. These documents set out the key areas of impact and related mitigation. The LVIA and the design of the Scheme was carried out in consideration of comments made in the Scoping Opinion (refer to Appendix 1B of the Environmental Statement [APP-052]) and in meetings between the Applicant and relevant local planning authorities during the pre-application period). The Applicant has been undertaking further discussions with SCC to explain how the design and mitigation proposals have developed over time to account for key areas of impact.	SCC was aware of the mentioned application documents prior to the drafting of the relevant representation. SCC therefore looks forward to discussing this issue in more detail with the Applicant and maintains that it expects the Applicant to work with the local authorities to reduce these impacts as they are noted in the Landscape and Visual Impact section of the joint LIR (section 10).
SCC-13	Transport and access	Pre-application	As a result of the Applicant not having undertaken pre-	The Applicant respectfully disagrees with this assertion. Before the production of the	SCC notes that the joint LIR [REP1-024] sets out the

		engagement	submission engagement with SCC on the transport assessment, SCC has not had the opportunity to discuss or provide comments on the methodologies for the Transport Assessment [APP-117] and the ES assessment of Transport and Access impacts [APP-045] pre-submission.	Preliminary Environmental Information Report (PEIR) consultation was undertaken with both Local Highways Authorities (LHAs) and National Highways including the methodology for the PEIR. After the production of the PEIR and before the production of the ES [APP-032 – APP-259] , two meetings were held with the LHAs and an additional meeting held with National Highways with identified the approach for the ES. Further consultation was undertaken via email correspondence with SCC regarding specific topics. The Environmental Statement includes a summary of comments raised by SCC, and how they have been addressed.	Councils' concerns in more detail, and looks forward to discussing this issue in more detail with the Applicant.
SCC-14	Transport and access	Assessment	The submitted material is not considered by SCC to be acceptable. SCC consider the assessments seriously flawed they fail to evidence conclusions, and SCC disagrees with many of the assumptions used, including the workforce modelling as an input to the transport assessment. There are also deficiencies in the highway-related provisions in the draft DCO.	<p>The assumptions and mitigation is set out in Chapter 13: Transport and Access of the Environmental Statement [APP-045], Appendix 13B (Transport Assessment) of the Environmental Statement [APP-117] and Appendix 13C (Framework Construction Traffic Management Plan and Travel Plan) of the Environmental Statement [APP-118]. It is un-clear which specific assumptions or part of the workforce modelling is in question. Responses to specific points raised are included throughout this document.</p> <p>The Applicant is in discussions with SCC on their comment that there are deficiencies in the highway – related provisions in the draft DCO [APP-019] and will seek to agree</p>	SCC notes that the joint LIR [REP1-024] sets out the Councils' concerns in more detail, and the Council looks forward to discussing this issue in more detail with the Applicant.

				a position with SCC during the examination.	
SCC-15	Transport and access	Assessment	SCC expects of the Applicant as a minimum to update the ES chapter on transport and the transport assessment and methodology, in order to provide credible evidence of impact and required mitigation, to accordingly improve the mitigation proposals, and to re-write the highway provisions in the DCO.	<p>Further to a meeting with both local Highways Authorities on 26 April 2022, it was agreed that additional technical information would be supplied to the councils. This will be supplementary information and potential sensitivity testing, and is not anticipated to require an update to Chapter 13: Transport and Access of the Environmental Statement [APP-045]. The mitigation has been clearly evidenced and is outlined in Appendix 13C (Framework Construction Traffic Management Plan and Travel Plan) of the Environmental Statement [APP-118] as well as the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011].</p> <p>The Applicant is in discussions with SCC on their comment that there are deficiencies in the highway – related provisions in the draft DCO and will seek to agree a position with SCC during the examination.</p>	<p>This comment is noted.</p> <p>SCC was aware of [APP-118] and appendices [APP-009] to [APP-011] prior to raising the issue in the relevant representation and maintains its position.</p> <p>SCC awaits further engagement regarding provisions in the draft DCO, particularly following the SoGC meeting on Transport on 4 October 2022.</p>
SCC-16	Land use	Assessment	Inappropriate baseline evidence and assumptions mean that the workforce modelling contained in the Socio-economics chapter of the ES is unsound as a basis for the Outline Skills, Supply Chain and Employment Plan. This has implications for any other	The Applicant considers that the approach taken to the baseline modelling underpinning assessment of construction employment generation presented in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] is appropriate, as it is based on good practice guidance (HCA Additionality Guidance). The conclusions of the	SCC was aware of [APP-044] prior to the issue being raised in the relevant representation. Para 12.17 – 12.22 of the joint LIR explain in further detail the Council's lack of confidence in the socio-economic ES assessment.

			assessments that would be expected to make use of this modelling, such as Transport.	assessment are also considered to be sound both on this basis and previous experience. The Applicant is liaising with SCC to discuss its concerns.	
SCC-17	Land use	Assessment	Contrary to the Applicant's assessments, SCC does not anticipate employment and socio-economic benefits of any significance. Until sound assessments can be provided, SCC asks the ExA to consider that local and regional socio-economic benefits are negligible for this project.	<p>The employment and socio-economic benefits of the Scheme are as reported in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044]. This reports that there is a significant temporary beneficial effect arising from the generation of construction and decommissioning employment and from the associated increase in gross value added (GVA) during construction respectively. The conclusions of the assessment are considered to be sound both on this basis and previous experience. To maximise and expand the economic benefits of the Scheme for the local community an Outline Skills, Supply Chain and Employment Plan [APP-268] has been included in the Application.</p> <p>The Applicant's assessments are considered robust and the Council has not provided any clarity as to why it considers the assessment to be unacceptable. The Applicant is liaising with SCC to discuss its concerns.</p>	<p>SCC was aware of [APP-044] prior to submission of the issue raised.</p> <p>As explained in para 12.27 – 12.33 of the joint LIR, the Councils anticipate negligible positive employment, skills and education impacts during the construction phase; para 12.67 notes that the Councils cannot identify the positive impacts during the operational phase due to lack of confidence in the ES assessment.</p>
SCC-18	Landscape and visual amenity	Landscape and Visual impact	A project of the scale and nature proposed, which will radically change the sense of place, the place attachment of the residents,	The landscape within the study area is the product of centuries of increasingly intense agricultural expansion and development. It is, by design, a productive landscape. A	SCC notes that the joint LIR [REP1-024] sets out the Councils' concerns in more detail, and looks forward to

			<p>and the recreational amenities of the affected villages and communities, over a long period of time. It will also change the character of an area which has been shaped by a unique combination of agriculture and horse racing. The ES does not recognise this, and the need to mitigate/compensate for these impacts.</p>	<p>detailed assessment of landscape character has considered the likely effects of the Scheme on the landscape at different scales. Most of the area is under intensive arable production with some areas of pasture around village edges and is interspersed with other uses such as settlement, large-scale free range pig farming and quarrying. In the southern part of the study area, the horse racing industry has transformed the landscape with extensive, manicured training areas and associated facilities. Important areas for nature and historic conservation are recognised as islands within the agricultural landscape.</p> <p>The Scheme is large and to mitigate this it has been designed as a series of discrete sites separated by substantial areas of largely intensively managed agricultural land and offsets from settlement edges. The landscape on the fringes of these settlements, which is not proposed to include above ground infrastructure related to the Scheme, tends to be more intricate than the surrounding arable land, with smaller fields defined by mature vegetation and well vegetated gardens. This, together with tree and shrub and hedgerow planting proposed as part of the masterplan for the Scheme, will maintain the sense of place and place attachment of residents. Several settlements are located</p>	<p>discussing this issue in more detail with the Applicant.</p>
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				<p>in the study area defined within Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042].</p> <p>Individual community areas are described in turn below:</p> <ul style="list-style-type: none"> Worlington – This small village, centred on The Street, is the closest to proposed solar farm infrastructure within Sunnica East Site B. The nearest area of solar panels (parcel E24) would be located 220m from the property of Queens Hill, on the southern edge of the village. Chalk grassland and a belt of woodland is proposed between the southern edge of the village and the solar panel arrays. Parcels E26 and E27 would be located approximately 200m south of the club house of the Royal Worlington and Newmarket Golf Club, which is surrounded by dense vegetation and beyond shelter belts which would enclose the Scheme. On the western edge of the village, solar farm development within parcel E12 would be located approximately 270m south of the closest property, beyond an area of open land currently used for free range pig farming. This open edge would be retained by an extensive area of grassland (ECO3). In summary, proposed offsets and the density of existing and proposed vegetation would limit perception of the Scheme 	
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				<p>and the potential effects on the setting of the settlement.</p> <ul style="list-style-type: none"> • Red Lodge – This is a largely post-war settlement, centred on Warren Road. The closest part of the Scheme would be parcel E21 of Sunnica East Site B, located approximately 450m west of Red Lodge, beyond the busy A11 trunk road and industrial development on Bridge End Road. The sense of place and place attachment of residents will not be affected. • Freckenham – The closest area of solar panels to this village would be parcel E05 in Sunnica East, approximately 1.2km to the north, with native grassland within ECO1 and ECO2 and several belts of existing and proposed vegetation in between on boundaries of fields in the largely flat landscape. The sense of place and place attachment of residents will not be affected. • Isleham – Solar panels would be located approximately 500m from the southeastern corner of the village in parcel E05 of Sunnica East, beyond intervening arable land. A belt of woodland is proposed to enclose and screen the structures. Solar panels in parcels EE01 and E03 would be located approximately 1.2km from the eastern edge of the village, beyond Lee Brook, which is not perceptible due to 	
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				<p>intervening vegetation in the flat landscape.</p> <ul style="list-style-type: none"> • West Row – The southern edge of this small village would be located approximately 700m from the closest area of solar panels to the southwest located in parcel E02 of Sunnica East. The Scheme would lie beyond the well-vegetated River Lark. • Fordham – The closest area of solar panels to Fordham would be parcels W01 and W02 of Sunnica West, approximately 1km south of the settlement and located to the east of Snailwell. There is substantial woodland and other mature vegetation in the intervening landscape, such that the Scheme will not affects its setting or character. • Chippenham – This small village lies to the north of Chippenham Park and Gardens. The closest part of the Sunnica East Site B would be parcel E19, approximately 2km to the northeast. The closest part of Sunnica West would be approximately 1.6km south, beyond Chippenham Park and Gardens. The sense of place and place attachment of residents will not be affected. • Snailwell – The hamlet of Snailwell would be located approximately 260m west of the closest area of solar panels 	
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				<p>in parcel W03 of Sunnica West, enclosed by proposed woodland planting and screened by intervening vegetation and rising land. There would also be solar panels in parcel W02 to the north, beyond an existing belt of mature trees. The sense of place and place attachment of residents will not be affected.</p> <ul style="list-style-type: none"> • Burwell – The proposed cable connection at Burwell would be located adjacent to and in the context of the existing substation. The fields on the western side of the village are small and defined by tree lines and dense hedgerows, creating physical separation from the sub-station. <p>In summary, it is acknowledged that the scale of the Scheme is large. The layout, across discrete sites within Sunnica A and Sunnica B, is intentional. The Scheme has been designed to avoid development within or directly on the boundaries of existing settlement and to retain separation between settlements and the wider landscape. Significant effects on the sense of place and place attachment of residents of settlements is not likely.</p> <p>There are sections of roads where solar farm infrastructure would be in closer proximity, for example to the north of Beck</p>	
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				Road between Isleham and south of the B1102 Freckenham Road between Worlington and Freckenham. In such cases mitigation has included limiting development to one side of the road, providing offsets of grassland and additional planting to enclose and screen solar farm infrastructure.	
SCC-19	Other	Local benefits	SCC expects an appropriate mitigation/compensation package for local communities.	<p>An Outline Skills, Supply Chain and Employment Plan has been submitted as part of the DCO Application [APP-268] and has been updated in response to the relevant representation. This seeks to secure the potential improvements, mitigation and compensation to local communities that could be implemented as part of the Scheme. The opportunities for this that the Outline Plan highlights are:</p> <ul style="list-style-type: none"> • Provision of apprenticeships; • Provision of other workforce training; • Support with STEM Education and Careers; • Measures to secure local recruitment; • Maximisation of the Diversity of the Workforce; • Business Networking and Support; and, • An inclusive procurement Strategy <p>In addition, the Applicant is in discussions with the council regarding wider</p>	<p>This comment is noted.</p> <p>SCC awaits further discussions regarding community benefits following on from the Councils initial proposal sent to the Applicant on 15/07/22.</p>

				community benefits.	
SCC-20	Heritage	Assessment	SCC Archaeological Service has been working with the Applicant on the design and carrying out of archaeological evaluation work since early stages of the project. While there is potential for SCC to reach agreement with the Applicant on this matter during the examination, at the present time a full evaluation report has not been presented as part of the application, and mitigation has not yet been secured in the draft DCO or through obligations.	Mitigation is detailed in paragraph 7.6.6 to 7.6.9 and in Section 7.8 of Chapter 7: Cultural Heritage of the Environmental Statement [APP-039]. However, as noted in paragraph 7.8.4 “ <i>Outstanding results, from evaluation trenching that was delayed due to land access and cropping schedule constraints, will be submitted prior to the examination stage of this application.</i> ” This information was required before a more specific mitigation strategy could be completed. The outstanding results of the evaluation was submitted to the ExA at Procedural Deadline A. A Detailed Archaeological Mitigation Strategy will be prepared for discussion with the County Councils and will be submitted to the Examination. The draft DCO [APP-019] does already provide for the securing of archaeological mitigation through Requirement 13.	This comment is noted.
SCC-21	Heritage	Assessment	SCC must reserve its position pending sight of a full archaeological evaluation report and firm proposals how mitigation can be secured.	The full archaeological evaluation report was submitted to the ExA at Procedural Deadline A. The archaeological evaluation report will inform the preparation of the Detailed Archaeological Mitigation Strategy.	This comment is noted.
SCC-22	Ecology	Assessment	For this kind of project it should be possible for the Applicant to deliver sufficient ecological mitigation and enhancement, but	The Scheme has followed the mitigation hierarchy and sought to avoid impacts to important ecological features, where possible. With reference to Chapter 8:	SCC was aware of APP-040, APP-258, and APP-108 prior to inclusion of the issue in the Relevant Representation.

			<p>gaps in the assessment must be corrected and adherence to the mitigation hierarchy should be more clearly evidenced. Outline mitigation proposals are lacking in detail, meaning that at present there is a lack of clarity concerning residual impacts.</p>	<p>Ecology and Nature Conservation of the Environmental Statement [APP- 040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8- 6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely residual impacts and effects undertaken in section 8.9. For example, details of the habitat creation and management for Stone Curlew is provided in Section 4 of the Offsetting Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108].</p> <p>In addition, specific areas will be managed for arable plants (refer to the illustrative parameter plans (see Figures 3-1 and 3-2 of the Environmental Statement) within Sunnica East Site B. Here four 3x20m wide strips will be provided in field E30 and four 3x10m wide strips in field E17/18. The creation and management of these plots is set out in paragraph 8.8.10 7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. This will protect the long-term future of arable flora across the Order limits.</p> <p>Further details and examples of mitigation</p>	<p>Para 8.166 – 8.203 of the joint LIR outline the required ecological mitigation as well as the requirements and obligations requested as amendments to the draft DCO.</p>
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				<p>proposals are set out in Section 8.8 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] and the Landscape and Ecology Management Plan [APP- 108].</p> <p>The Applicant would welcome the Council identifying where it considers there are gaps in the assessment, lack of detail in the mitigation proposals and lack of clarity regarding residual impacts.</p>	
SCC-23	Ecology	Assessment	<p>SCC requires from the Applicant that gaps in the assessments are closed. Further detail and evidence of the mitigation proposals, in line with the mitigation hierarchy, have to be presented, and mitigation must be appropriately secured in the dDCO or in planning obligations. SCC must reserve its position pending sight of this information.</p>	<p>As per SCC-22, the Applicant would welcome the Council identifying where they consider there are gaps in the assessment and the required further detail and evidence of the mitigation proposals. The development of ecological mitigation is secured pursuant to Requirement 8 of the draft DCO [APP-019].</p>	<p>Section 8 of the joint LIR on ecology and biodiversity should address the Applicant's queries regarding inadequacies of information provided. Para 8.166 – 8.192 address the required ecological mitigation. Para 8.193 – 8.203 outline where the Councils request changes to the draft DCO APP-019 in ecological terms.</p>
SCC-24	Water resources	Flooding and drainage	<p>SCC's review of the submitted materials and well as its local knowledge as Lead Local Flood Authority, indicates that there are few outstanding issues; these are likely be resolved through further technical work.</p>	<p>This comment is noted.</p>	<p>No response required.</p>
SCC-25	Human health	Battery safety	<p>SCC has, in its role as Suffolk Fire and Rescue Authority, outlined to the Applicant its firefighting requirements for dealing with the unique characteristics of Battery</p>	<p>The draft Development Consent Order [APP-019] includes requirement 7 in Schedule 2 which secures the Battery Fire Safety Management Plan ("BFSMP"). The BFSMP is to be approved by the relevant</p>	<p>The Council understands that the Applicant is providing a revised outline BFSMP, and looks forward to seeing the updated details.</p>

			Energy Storage System fires. An initial review of the Outline Battery Fire Safety Management Plan [APP-267] indicates that appropriate measures will be put in place. Subject to securing appropriate mechanisms in the DCO, it is likely that agreement can be reached during the examination.	planning authorities, in consultation with the fire and rescue services. The BFSMP must be in accordance with the Outline BFSMP which accompanies the application [APP-267]. If SCC accepts that the Outline BFSMP then the Applicant will seek to agree this in a Statement of Common Ground.	
SCC-26	Planning	National policy statements	SCC agrees with the Applicant's planning statement (see 1.4.4 – 1.4.5 of [APP-261]) that National Policy Statement EN-3 does not 'have effect' for the purposes of S104 of the Planning Act 2008, and that therefore it is appropriate for the application to be decided under S105, unless at some point during the examination the draft EN-3 is designated.	<p>This comment is noted. However, the Applicant does not expect the draft NPSs to have effect under section 104 of the PA 2008 even if they are designated during the course of the examination. Transitional arrangements for the draft Energy NPSs are set out in Section 1.6 of Draft NPS EN-1. This states at paragraphs 1.6.2 and 1.6.3 that:</p> <p>“...The 2021 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the designation of those amendments.</p> <p>However, any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with</p>	This comment is noted.

				<p>regard to the specific circumstances of each development consent order application.”</p> <p>Although draft NPS EN-3 is in draft form and has not been designated, the Applicant expects that the Secretary of State will consider it to be relevant and important to their decision, as was the case for the recent decision on the Little Crow Solar Park DCO. This is because it is the most recent expression of government policy and is in a relatively advanced stage of preparation.</p> <p>Despite the transitional arrangements set out in the document, should draft NPS EN-3 be designated before the DCO application is decided, the Applicant considers that the weight given to it in the Secretary of State’s decision should be significant, since it would represent policy that is in force that directly concerns the type of development that the Scheme comprises.</p>	
SCC-27	Planning	National policy statements	In SCC’s view both the current and draft National Policy Statements are likely to be ‘important and relevant’ for the purposes of S105(2). As the draft EN-3 contains technology specific policy relating to large-scale solar development SCC thinks it is clearly more relevant in this case than the currently designated EN-3, notwithstanding that it is yet to	The Applicant agrees with this statement.	No response required.

			be designated.		
SCC-28	Planning	National policy statements	<p>Given the possibility that draft EN-3 may be designated before either the conclusion of the examination, or the grant of consent, SCC considers that it would be helpful if the Applicant address points raised by draft EN-3 but not covered in their planning statement such as:</p> <ul style="list-style-type: none"> • Providing the site capacity on the basis of the AC capacity of inverters as per 2.48.7 of draft EN-3. SCC considers that the capacity of the project would be useful for the decision-maker in contextualising the benefits of the project and weighing them against adverse impacts. • Justifying the proposed lifetime of the consent with reference to 2.49.9 - 2.49.13. While this is not a determinative policy test, it is clearly relevant to the evaluation of landscape and other impacts against benefits. • Making clear, given the 	<p>Please see the response to SCC-26 regarding transitional arrangements in the event NPS EN-3 is designated before either the conclusion of the examination, or the grant of consent.</p> <p>Notwithstanding the above, responses to the queries raised in the bullet points are provided below:</p> <ul style="list-style-type: none"> • The purpose of paragraph 2.48.7 of draft NPS EN-3 is to standardise the approach to determining whether different types of generating station would be classified as NSIP under Section 15 of the Planning Act 2008. For the avoidance of doubt, paragraphs 1.4.1 and 1.4.2 of the Planning Statement Part 1 [APP-261] which refer to the Scheme substantially exceeding the 50 MW generation threshold for being considered an NSIP would be applicable whether considered in either Direct Current (DC) or Alternating Current (AC) terms. • Draft EN-3 provides no planning policy to support the time limitation of a draft DCO. Where the applicant chooses to offer a time-limited consent then this can 	This comment is noted.

			<p>length of the consent over the typical 25 years envisioned by draft EN-3, whether there will be a substantial replacement of solar array equipment during the operational phase. Dependent on the scale of this operation it may be incorrect to scope out the assessment of operational impacts on themes such as Traffic and Transport and Socio-economics.</p>	<p>be an important consideration for the Secretary of State. The Applicant is not proposing to substantially replace all solar PV equipment but instead is expecting the infrastructure to still be functional after 25 years due to improvements in the longevity of solar PV and maintenance techniques and hence has applied for a longer operational period.</p> <ul style="list-style-type: none"> Chapter 3: Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 that the operational life of the Scheme is 40 years. As set out by paragraph 6.3.23 of Chapter 6: Climate Change of the Environmental Statement [APP-038], an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to arbitrarily require the decommissioning of an operational solar farm after 25 	
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				<p>years, which would be 15 years before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays.</p> <ul style="list-style-type: none"> • In accordance with the above bullet-point, PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules. No wholesale replacement of solar PV arrays is anticipated. In any case, the DCO application seeks authorisation to construct, operate and maintain the Sunnica Energy Farm. Article 2 of the draft DCO [APP-019] defines the meaning of “maintain” in the draft DCO. This sets out that the definition does not include removal, reconstruction or replacement of the whole of the authorised development. Article 5(3) of the draft Development Consent Order [APP-019] also sets out that the carrying out of any maintenance works which are likely to give rise to any materially new or materially different effects that have not been assessed in the Environmental Statement would not be authorised. Therefore, the substantial replacement of solar 	
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				array equipment would not be authorised by the DCO if it would lead to any materially new or materially different effects to those assessed by the Environmental Statement, including operational impacts on themes such as Traffic and Transport and Socio-economics.	
SCC-29	Heritage	Assessment	SCC now expect a full evaluation report which includes specialist reports, C14 dates etc. to be submitted into the Examination, and to SCC Archaeological Service for approval and inclusion in the Historic Environment Record (HER), before determination of the application.	Please see the response to SCC-20/SCC-21. The evaluation report submitted at Procedural Deadline A [PDA- 002] will also be submitted for inclusion in the HER.	This comment is noted.
SCC-30	Heritage	Assessment	Dependent on the findings in the forthcoming full report, and observations during site monitoring visits, SCC may not need to object on archaeological grounds, as long as: the areas previously excluded from development or disturbance to secure the survival of important archaeological remains (on the basis of the Geophysical Survey results) remain excluded, and; the methodologies adopted for the creation of grassland on archaeologically sensitive sites	This comment is noted. A management plan will be created and will form part of the detailed Construction Environmental Management Plan to be prepared following the appointment of a contractor, prior to the start of works. The plan will detail the areas to be excluded, the construction methodology, the long-term management proposals, and any decommissioning phase. Table 3-2 in the Framework Construction Environment Management Plan [APP-123] contains outline details for the areas which have been removed from the developable area due to the presence of archaeology. The Landscape and Ecology Management Plan [APP-108] also contains	This comment is noted

			are appropriate to achieve preservation in situ of buried archaeological remains. SCC's assessment of this will be provided within the LIR.	<p>further information. Information on the management of these sites during construction will also be set out within the Detailed Archaeological Mitigation Strategy (DAMS). A first draft will be submitted at Deadline 1 of the Examination.</p> <p>The methodology for archaeological mitigation will be proposed in the first draft of a DAMS to be submitted to the Examination following on-going engagement with SCC and CCC. The DAMS will propose the methodology for undertaking set piece excavations and any other mitigation where required. The DAMS will also include an Overarching Written Scheme of Investigation which will present an overview of all areas of proposed mitigation. Following SCC agreement of the draft DAMS, it is proposed that the appointed Archaeological Contractor produces a series of Site Specific WSI's (SSWSI) for individual mitigation areas, also to be agreed with SCC. If required, the appointed Archaeological Contractor may also produce individual Method Statements in response to the DAMS and individual SSWSIs.</p>	
SCC-31	Ecology	Assessment	SCC notes that important detail is still lacking from the Ecology and Nature Conservation chapter of the Environmental Statement [APP- 040]. In particular, characterisation of some impacts	Potential impacts on ecological features during construction, operation and decommissioning are presented in section 8.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] .	Further detail on the Council's concerns is set out in section 8 of the LIR. Ecology is a topic which could benefit from detailed discussions on the Applicant's mitigation

			<p>is inadequate and the exclusion of certain ecological features from detailed assessment has not been justified. The detailed assessments fail to address all potential impacts and rely heavily on the Framework Construction Environmental Management Plan (CEMP) [APP-123] and Landscape and Ecology Management Plan (LEMP) [APP-108] for mitigation, which in themselves are lacking crucial details. Impacts should have been characterised and quantified wherever possible.</p>	<p>Ecological features taken forward for detailed assessment is based on the criteria set out in paragraphs 8.4.26-8.4.32 and 8.6.17 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040].</p> <p>The Applicant would welcome the identification of what important detail is considered to be lacking from Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040] including for which impacts the characterisation is said to be lacking and for which excluded ecological features detailed assessment has not been justified.</p> <p>The Framework Construction Environmental Management Plan (CEMP) [APP-123], Framework Operation Environmental Management Plan (OEMP) [APP-126] and Outline Landscape and Ecology Management Plan (OLEMP) [APP-108] will deliver the necessary mitigation measures and compensation.</p>	<p>proposals.</p>
SCC-32	Ecology	Assessment	<p>There has been insufficient evidence of adherence to the Mitigation Hierarchy and SCC considers that further improvements to the design are required to follow the Mitigation Hierarchy by avoiding impacting</p>	<p>The Scheme has followed the mitigation hierarchy and sought to avoid impacts to protected species and priority habitats, where possible. For example, the Scheme has retained all areas of broad-leaved semi-natural woodland, semi-improved calcareous grassland and standing water</p>	<p>Further detail on the Council's concerns is set out in section 8 of the LIR. Ecology is a topic which could benefit from detailed discussions on the Applicant's mitigation proposals.</p>

			<p>upon important habitats and species, such as arable flora.</p>	<p>(ponds and lakes). As such, the Scheme avoids impacts on roosting bats, Great Crested Newt, reptiles and breeding and wintering birds. With reference to Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040], important ecological features identified as part of the detailed baseline surveys are reported in Tables 8-4, 8-5, 8-6, 8-7 and 8-8. Section 8.8 sets out avoidance and mitigation measures for important ecological features, with an assessment of likely impacts and effects undertaken in section 8.9.</p> <p>As set out in paragraph 8.10.7 of Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP- 040] construction activities are predicted to result in the direct loss of arable habitats, supporting notable arable flora in their field margins (not across the whole fields). The following areas within the Order limits, where notable species were recorded, will be managed for arable plants (refer to the illustrative parameter plans (see Figures 3-1 and 3-2 of the Environmental Statement): Sunnica East Site B: 4 3x20m wide strips in field E30 and 4 3x10m wide strips in field E17/18 Sunnica West Site A: 3 3x10m wide strips in field W09. The creation and management of these plots is set out in paragraph 8.8.10 7 of Chapter 8: Ecology and Nature Conservation of the</p>	
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				Environmental Statement [APP- 040]. This will protect the long-term future of arable flora across the Order limits	
SCC-33	Ecology	Mitigation	Detail is lacking on habitat creation proposals, for example how habitats to be created will link and form a nature network. Improvements to the riverine environment also do not appear to have been considered.	<p>Appendix 10I, Landscape and Ecology Management Plan of the Environmental Statement [APP-108] sets out the rationale for habitat creation, including how it forms a coherent nature network. For example, paragraph 1.7.29 sets out how the Scheme will align with and contribute to Buglife's B-Lines project, providing landscape scale benefits for pollinators through increased habitat provision and connectivity. Annex C sets out the indicative grass mixes to be sown across the Scheme and grazing regimes for management. Areas designated for conservation grazing have been incorporated to link in with the B-Lines project through allowing diverse grasslands to establish and be managed for the benefit of pollinators.</p> <p>Further detail on these measures, including potential improvements to riverine environments and how habitat creation will link to form a coherent biodiversity network including their long-term management will be set out in the detailed LEMP to be approved by ECDC and WSC at the detailed design stage, if development consent is granted. It should be noted that whilst extensive in-channel enhancements aren't proposed, the undeveloped areas adjacent to watercourses, embedded</p>	Further detail on the Council's concerns is set out in section 8 of the LIR. Ecology is a topic which could benefit from detailed discussions on the Applicant's mitigation proposals.

				within the Scheme design, will enhance and protect wildlife corridors along these riparian zones. In addition, the shift in land use away from arable and pig farming, has the potential to greatly improve the quality of watercourses, through reduced fertiliser and pesticide run-off. Stabilisation of the soil through the creation of permanent grasslands across the Scheme will also reduce sediment run-off.	
SCC-34	Ecology	Mitigation	Insufficient detail is given regarding the mitigation measures and compensatory habitat upon which the conclusions of the impact assessment are hinged.	Detailed mitigation measures are clearly laid out in the LEMP [APP-108] . The Applicant would welcome the identification of what specifically is said to be lacking in terms of detail regarding the mitigation measures and compensatory habitat upon which the conclusions of the impact assessment rely.	Clarity on required ecological mitigation can be found in para 8.166 – 8.192 of the joint LIR. For reference to the LEMP [APP-108] , paras 8.166 and 8.167 provide additional information.
SCC-35	Ecology	Assessment	It is unclear how the Applicant will ensure the survival of compensatory habitats beyond the 40-year life span of the project. If consideration is not made past the 40-year lifespan of the project, it is possible that there could be a net loss to biodiversity.	The Scheme will not remove landscape enhancements at the point of decommissioning and only the infrastructure elements of the Scheme would be removed, as set out in the Framework Decommissioning Environmental Management Plan [APP-125] . If after decommissioning, when the land is no longer under the control of the Applicant nor covered by this consent, a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements as appropriate at that point in time.	This comment is noted.

SCC-36	Ecology	Biodiversity net gain	Further enhancements could be delivered within the scheme and should be explored; the Biodiversity Net Gain Assessment [APP-259] shows a reasonable attempt at achieving net gain, however further supporting information regarding the specifics of how this will be achieved is required. This includes full calculations which should be included as an appendix.	The Applicant acknowledges the Council's comments and these will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which will provide the detail as requested for the calculations using the latest Biodiversity Net Gain metric 3.1. This will be communicated through a technical note which will include the information as required by stakeholders regarding calculations.	This comment is noted.
SCC-37	Ecology	Biodiversity net gain	On the face of it, considerable net gain should be easily achievable however there is insufficient evidence provided at this point. Evidence will also be required to show Biodiversity Net Gain is on top of compensation and mitigation to avoid double-counting.	<p>The Biodiversity Net Gain Assessment [APP-259], using Defra's Biodiversity Metric 3.0, sets out the approach and evidence used in undertaking the calculations and avoids double counting.</p> <p>The Council's comments will be taken into consideration as part of an updated calculation of Biodiversity Net Gain which also include aspects such as follow up surveys for some habitats, all of which will be reported in a technical note which will be circulated to SCC. Putting these changes into perspective, it is expected the current calculation of a net gain of about 83% habitat units, 16% hedgerow units and 1% of river units will not change substantially.</p>	<p>This comment is noted.</p> <p>As stated in para 8.192 of the joint LIR, the mentioned Defra Metric spreadsheet has not been submitted which makes it difficult to assess the predicted BNG or assumptions used.</p>
SCC-38	Ecology	Mitigation	The Habitats Regulations Assessment (HRA) [APP-092] shows likely significant effects on	This comment is noted. Details of the habitat creation and management is provided in Section 4 of the Offsetting	This comment is noted.

			<p>Breckland Special Protection Area (SPA). The Appropriate Assessment includes proposed mitigation such as land for nesting and foraging Stone Curlew; SCC is awaiting Natural England's view as to whether these proposals are acceptable mitigation according to Habitats Regulation Assessment (HRA). It will be important to consider whether there is certainty over the effectiveness of the measures proposed and whether these proposals meet the criteria set out in Natural England's advice note 'Sourcing and managing mitigation land'.</p>	<p>Habitat Provision for Stone-Curlew Specification [APP-258] and Section 1.8 of the Landscape and Ecology Management Plan [APP-108]. The areas embedded for offsetting utilise the species' current and historical distribution across the Order limits and have been designed and will be delivered following what has been successful with the other similar habitat and nesting plots around the Breckland area. This has considered appropriate Natural England advice. Final agreement (i.e. allowing for development of the currently submitted specification post consent) on the detail of the plots is to be secured pursuant to an amendment to DCO Requirement 10 that will be brought forward at the earliest timetabled time for submission of an updated DCO at Examination.</p>	
SCC-39	Water resources	Flood risk	<p>As Lead Local Flood Authority, local knowledge indicates that there are not many areas of concern remaining at this stage and with a little more work SCC should be able to reach agreement with the Applicant.</p>	<p>This comment is noted.</p>	<p>No response required.</p>
SCC-40	Water resources	Flooding	<p>Any locations within the order limits which are recorded to be within areas at risk of flooding from any source of flooding should be reviewed and the proposals designed to reflect the level of risk in accordance with</p>	<p>This comment is noted and agreed. The update of the national pluvial flood mapping has been reviewed. The updated national pluvial flood mapping does not impact the current conclusions of the Flood Risk Assessment [AS-007 to AS-010].</p>	<p>This comment is noted.</p>

			the sequential approach. The national pluvial flood mapping has been recently updated and the flood risk assessment may need to be reviewed to reflect this.		
SCC-41	Constructi on	Drainage	The sustainable management of surface water should be considered for all sites both during the construction and, where applicable, the operational phases with runoff managed in accordance with the Construction Industry Research and Information Association (CIRIA) Sustainable Drainage Systems (SuDS) hierarchy. Following the completion of the construction phase, runoff from the area within the order limits should replicate the greenfield scenario.	The proposed surface water drainage strategy is outlined within the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note. The use of SuDS features, swales and infiltration basins, is a key factor within the surface water drainage strategy in order to mimic existing conditions. Section 3.3 within the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note states that HR Wallingford’s UK SuDS Greenfield Runoff Rate Estimation tool has been used to calculate the greenfield runoff rates for the site for a series of return periods. As stated within Section 3.4 of the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note, it is not intended to discharge surface water runoff off-site, over and above existing rates and volumes; betterment is sought to reduce overall volumes at peak times to reduce flood risk downstream. Surface water generated within the site will be disposed of via infiltration and natural overland flow to mimic existing conditions. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme, pursuant to Requirement 12 of the draft DCO [APP-019] .	This comment is noted.

SCC-42	Water resources	Design	Where the proposals lie within areas where aquifers, groundwater or water bodies are recorded to have a particular vulnerability to pollutants, then this must be given appropriate consideration within the designs.	The Scheme overlies the Chalk aquifer, a Principal aquifer, and is vulnerable to pollution. This is acknowledged in Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] . The risks to groundwater and surface water bodies for each of the sites are assessed within Section 9.8. With the embedded mitigation within the design and construction methodologies, the assessment concludes there are considered to be no significant effects from the construction and operation of the Scheme.	This comment is noted.
SCC-43	Water resources	Design	There are a significant number of Ordinary Watercourses within the project area for which measures will need to be taken to ensure any adverse impacts to them are minimised or eliminated entirely where possible.	The potential for adverse impacts on watercourses, both Main Rivers and ordinary watercourses, has been assessed within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] . Section 9.7 details the embedded mitigation to be employed during construction of watercourse crossings, both via non- intrusive techniques (paragraphs 9.7.16 to 9.7.22) and intrusive techniques (paragraphs 9.7.23 to 9.7.28). No permanent above ground construction for the location of solar panels would take place within a 10m buffer from the edge of the typical channel / water's edge of watercourses. The assessment concludes that with the embedded mitigation (secured pursuant to the Framework CEMP [APP-123]) there would	This comment is noted.

				be no significant effects on surface watercourses within the area of the Scheme.	
SCC-44	Water resources	Design	A surface water management plan (SWMP) has been undertaken for the Newmarket area, the findings of which should be incorporated into the design, such that the proposals do not adversely impact sensitive catchments.	The Newmarket Surface Water Management Plan (SWMP) (BMT, June 2019) covers the area of Newmarket and includes the Newmarket Brook. Newmarket Brook flows northwards through Newmarket to the River Snail. Areas of the Scheme are located close to the River Snail, and the river is crossed non-intrusively by the cable route. The Scheme does not result in any flow changes within the river, and as such there are no changes to propagate upstream to Newmarket, which is located approximately 2.5km south, and upstream from Sunnica West Site B. There is no impact from the SWMP to the site either.	This comment is noted.
SCC-45	Water resources	Design	Suffolk County Council have issued guidance on the sustainable management of surface water and flood risk with respect to development which should be reflected within the designs for the proposed works in the area under the jurisdiction of Suffolk County Council.	The proposed surface water drainage strategy is outlined within the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note. Paragraph 3.1.1 states the proposed surface water drainage strategy for the Scheme is to mimic the natural drainage conditions of the site as much as possible following the SuDS principles of surface water drainage. Local policies and guidance have been reviewed through the process, and the SuDS principles in the Technical Note comply with them. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme pursuant to	This comment is noted.

				Requirement 12 of the draft DCO.	
SCC-46	Water resources	Design	BRE365 compliant infiltration testing will be required in locations where infiltration features are to be located to support the designs.	As stated in the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note, paragraph 3.1.1, detailed drainage designs and SuDS feature locations will be determined post consent at detailed design stage. The exact location of infiltration features will be confirmed post consent, with infiltration testing to be carried out to inform the detailed design stage. Within the Framework Construction Environmental Management Plan [APP-123] Table 3-10, it is stated that infiltration design will be in accordance with BRE365 and infrastructure will be placed at least 10m away from watercourses. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme pursuant to Requirement 12 of the draft DCO.	This comment is noted. The Council observe that it is important that SuDS features are sized appropriately at an early stage, as they can occupy a large area and it is difficult to make amendments to the order limits of a project after a Development Consent Order is made. The Council would therefore encourage infiltration testing at an early stage.
SCC-47	Water resources	Design	For locations on steep slopes or where overland flows of surface water are known to present issues locally, even if this hasn't been identified on national pluvial flood mapping, an allowance should be made for this within the location and design of (SuDS) features (e.g. including interception features to safely divert flows).	The land within the Order Limits is of gentle undulating nature. There are no areas of steep slopes within the Order limits. The local topography of the land within the Order limits will not be significantly altered. Locations of proposed swales are at natural low points to collect overland runoff from PV catchment sites and compound / BESS areas. SuDS features are located perpendicular to	This comment is noted.

				site contours, to provide an optimum solution to mitigate and reduce flood risk on site and elsewhere. Flows will not be diverted beyond existing routes and overland flows will naturally be intercepted by SuDS features to mitigate flood risk.	
SCC-48	Water resources	Assessment	Exceedance flows should be identified on a plan demonstrating where water would travel should a rainfall event occur that was in excess of the design capacity of the network or in the event of a blockage or failure of the system. Exceedance flows should be mitigated where necessary (i.e. where they cannot be directed away from existing/proposed buildings).	As stated in the Flood Risk Assessment – Part 4 [AS-010] , Annex F Drainage Technical Note paragraph 3.1.3, detailed drainage plans will be developed at detailed design stage. These will include the exceedance flow routes, and level/gradient data. It is not considered feasible at this stage in the Scheme’s development to provide this information. SCC as LLFA will determine whether to approve the detailed drainage strategy for the Scheme pursuant to Requirement 12 of the draft DCO [APP-019] .	This comment is noted.
SCC-49	Water resources	Design	Blue/Green corridors within the site must be protected both within the overall design and throughout the proposed works. A detailed assessment of the topography and existing/proposed contours must be undertaken to establish the location and nature of the existing flow-paths. Any existing corridors must be retained or enhanced where possible.	The application contains a Landscape Masterplan [APP- 209 to APP-214] . This illustrates the location of development areas, and the buffers in place along blue and green corridors. The green and blue infrastructure layout is secured within the DCO pursuant to the LEMP [APP-108] . Additionally, this is acknowledged within Chapter 9: Flood Risk, Drainage and Water Resources of the Environmental Statement [APP-041] , Section 9.7, paragraph 9.7.42: no permanent above ground construction would take place within a 10m buffer from	This comment is noted.

				<p>the edge of the typical channel / water's edge of watercourses. The panels will be offset from watercourses by a minimum of 10m from the edge of the typical channel / water's edge of watercourses. Existing flow regime is being maintained with no changes to ground levels, apart from the BESS area which will be directed to existing flow paths with appropriate attenuation.</p> <p>Furthermore, Appendix 9B of the Environmental Statement (Water Framework Directive Assessment) [APP-094] sets out in Section 6 opportunities for watercourse enhancements and states in paragraph 6.1.3 that <i>"The design of reinstatement proposals and enhancement opportunities will be undertaken during detailed design post-consent. This will be undertaken as part of a WFD Mitigation and Enhancement Strategy that is secured in the DCO through the Framework CEMP (provided in Appendix 16C of the Environmental Statement [APP-123])." </i></p>	
SCC-50	Landscape and visual amenity	Scale	In landscape terms Sunnica is set apart from other consented solar developments, including other NSIPs, by its scale and extent. This leads to significant landscape and visual issues.	<p>The Scheme is similar in scale to several other proposed solar energy farms in the UK. The Landscape and Visual Impact Assessment (LVIA) set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] summarises the effects on the landscape in detail, from the national scale, through regional, county, district and neighbourhood scales to local landscape</p>	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

				<p>character areas defined by the Applicant.</p> <p>It is acknowledged that there will be broad-scale change to the character of the landscape at the site level and within parts of the Rolling Estate Chalklands landscape character type (LT) defined within the Suffolk Landscape Character Assessment 2010, within Appendix 10D of the Environmental Statement [APP-103].</p> <p>Effects on some receptors would be significant at construction and year 1 or operation, reducing in the most part to not significant at year 15 of operation. Residual significant effects are predicted for some landscape receptors at year 15 of operation, particularly relating to intra project effects, as set out in Appendix 10G of the Environmental Statement [APP-106].</p> <p>NPS EN-1 recognises that virtually all energy NSIPs will have effects on the landscape and that all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.</p>	
SCC-51	Landscape and visual amenity	Scale	Rather than being perceived as a solar development occupying an area of land within a wider landscape, Sunnica has the potential to dominate and transform the local landscape, to alter it beyond recognition, and	<p>The Scheme would not dominate and transform the local landscape to the extent that it would alter it beyond recognition. The Scheme is split into sites with substantial areas of predominantly intensively managed agricultural land between. It has been designed to retain the</p>	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

			thus to create a new landscape altogether.	existing landscape pattern and features as far as possible and effects on landscape character will be localised. Whilst it is acknowledged that some key characteristics, such as openness, will change locally, the majority of key characteristics will be retained. For example, within the Rolling Estate Chalklands LT, the large uniform fields enclosed by low hawthorn hedges and shelter belt planting will be retained and the clustered villages with flint and thatch vernacular houses in villages will not be altered.	
SCC-52	Operations	Operating life	While the adverse visual effects on communities may be justifiable in the short term to address the climate crisis, it is not justifiable to seek a consent that goes beyond the initial lifespan of the PV panels (approx. 25 years) without providing an opportunity to assess the policy merits of the proposal at that time. SCC considers that the proposed lifespan of the project of 40 years, and the consequent temporal accumulation of adverse effects, is not reasonable and appropriate considering that the need is to deliver Net Zero by 2050 and decarbonise the Grid by 2035.	Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years. Chapter 3, Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 c that the operational life of the Scheme is 40 years. As set out by paragraph 6.3.23 of ES Chapter 6, Climate Change of the Environmental Statement [APP-038] , an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to arbitrarily require the	This comment is noted.

				<p>decommissioning of an operational solar farm after 25 years, which would be 15 years before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays.</p> <p>The need for a net zero electricity grid and economy will not end once targets for delivery of a net zero electricity grid by 2035 and economy by 2050 are initially achieved.</p> <p>In addition, the Applicant considers that the Scheme should be considered in the context of policy as it exists at the point the application is submitted and the decision is taken. It is not considered reasonable to consider the merits of the scheme in the context of unknown possible policy changes in future years.</p>	
SCC-53	Landscape and visual amenity	Design	<p>The fragmented layout of the proposals, located amidst and around several settlements, has the potential to impact on local character to such an extent as to affect the sense of place, and the place attachment of the residents, of the affected villages and communities. Many residents will experience the adverse visual and perceptual effects of various elements of the solar farm as part of their daily routines.</p>	<p>The landscape within the study area is the product of centuries of increasingly intense agricultural expansion and development. It is, by design, a productive landscape. A detailed assessment of landscape character has considered the likely effects of the Scheme on the landscape at different scales. Most of the area is under intensive arable production with some areas of pasture around village edges and is interspersed with other uses such as settlement, large-scale free range pig farming and quarrying. In the southern part</p>	Refer to SCC's comments in SCC-18 on this table.

				<p>of the study area, the horse racing industry has transformed the landscape with extensive, manicured training areas and associated facilities. Important areas for nature and historic conservation are recognised as islands within the agricultural landscape.</p> <p>The Scheme is large and to mitigate this it has been designed as a series of discrete sites separated by substantial areas of largely intensively managed agricultural land and offsets from settlement edges. The landscape on the fringes of these settlements, which is not proposed to include above ground infrastructure related to the Scheme, tends to be more intricate than the surrounding arable land, with smaller fields defined by mature vegetation and well vegetated gardens. This, together with tree and shrub and hedgerow planting proposed as part of the masterplan for the Scheme, will maintain the sense of place and place attachment of residents. Several settlements are located in the study area defined within Chapter 10: Landscape and Visual Effects of the Environmental Statement [APP-042].</p> <ul style="list-style-type: none"> • Worlington – This small village, centred on The Street, is the closest to proposed solar farm infrastructure within Sunnica East Site B. The nearest area of solar panels (parcel E24) would be 	
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				<p>located 220m from the property of Queens Hill, on the southern edge of the village. Chalk grassland and a belt of woodland is proposed between the southern edge of the village and the solar panel arrays. Parcels E26 and E27 would be located approximately 200m south of the club house of the Royal Worlington and Newmarket Golf Club, which is surrounded by dense vegetation and beyond shelter belts which would enclose the Scheme. On the western edge of the village, solar farm development within parcel E12 would be located approximately 270m south of the closest property, beyond an area of open land currently used for free range pig farming. This open edge would be retained by an extensive area of grassland (ECO3). In summary, proposed offsets, the density of existing and proposed vegetation would limit perception of the Scheme and the potential effects on the setting of the settlement.</p> <ul style="list-style-type: none"> • Red Lodge – This is a largely post-war settlement, centred on Warren Road. The closest part of the Scheme would be parcel E21 of Sunnica East Site B, located approximately 450m west of Red 	
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				<p>Lodge, beyond the busy A11 trunk road and industrial development on Bridge End Road. The sense of place and place attachment of residents will not be affected.</p> <ul style="list-style-type: none"> • Freckenham – The closest area of solar panels to this village would be parcel E05 in Sunnica East, approximately 1.2km to the north, with native grassland within ECO 1 and ECO 2 and several belts of existing and proposed vegetation in between on boundaries of fields in the largely flat landscape. The sense of place and place attachment of residents will not be affected. • Isleham – Solar panels would be located approximately 500m from the southeastern corner of the village in parcel E05 of Sunnica East, beyond intervening arable land. A belt of woodland is proposed to enclose and screen the structures. Solar panels in parcels EE01 and E03 would be located approximately 1.2km from the eastern edge of the village, beyond Lee Brook, which is not perceptible due to intervening vegetation in the flat landscape. • West Row – The southern edge of this small village would be located approximately 700m from the 	
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				<p>closest area of solar panels to the southwest located in parcel E02 of Sunnica East. The Scheme would lie beyond the well-vegetated River Lark.</p> <ul style="list-style-type: none"> • Fordham – The closest area of solar panels to Fordham would be parcels W01 and W02 of Sunnica West, approximately 1.km south of the settlement and located to the east of Snailwell. There is substantial woodland and other mature vegetation in the intervening landscape, such that the Scheme will not affects its setting or character. • Chippenham – This small village lies to the north of Chippenham Park and Gardens. The closest part of the Sunnica East Site B would be parcel E19, approximately 2km to the northeast. The closest part of Sunnica West would be approximately 1.6km south, beyond Chippenham Park and Gardens. The sense of place and place attachment of residents will not be affected. • Snailwell – The hamlet of Snailwell would be located approximately 260m west of the closest area of solar panels in parcel W03 of Sunnica West, enclosed by proposed woodland planting and 	
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				<p>screened by intervening vegetation and rising land. There would also be solar panels in parcel W02 to the north, beyond an existing belt of mature trees. The sense of place and place attachment of residents will not be affected.</p> <ul style="list-style-type: none"> • Burwell – If Option 2 for connecting the Scheme to the national electricity transmission system were to proceed, the proposed substation at Burwell would be located adjacent to and in the context of the existing substation approximately 300m to the west. The fields on the western side of the village are small and defined by tree lines and dense hedgerows, creating physical separation from the sub-station. <p>In summary, it is acknowledged that the scale of the Scheme is large. The layout, across discrete sites within Sunnica A and Sunnica B, is intentional. The Scheme has been designed to avoid development within or directly on the boundaries of existing settlement and to retain separation between settlements and the wider landscape. Significant effects on the sense of place and place attachment of residents of settlements is not likely.</p> <p>The Applicant has been undertaking further</p>	
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				discussions with SCC to explain how the design and mitigation proposals have developed over time to account for key areas of impact.	
SCC-54	Human health	Quality of life	In its entirety the scheme is likely to adversely affect the residents' quality of life, contrary to the Design Principles of the National Infrastructure Commission.	Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices [APP-100 to APP-108] provide a thorough and detailed assessment of the likely effects of the Scheme on visual receptors (people). This assessment considered the likely effects on visual receptors with reference to 59 viewpoints. This assessment concluded that the visual effects relating to Sunnica East Site A would range between negligible adverse and minor adverse and for Sunnica East Site B would range between neutral and minor adverse at year 15 of operation. For Sunnica West Site A, moderate adverse effects are predicted for VP38 Recreational users and users of the training grounds at the Limekilns. Effects on all other visual receptors relating to Sunnica West Site A would not be significant by year 15 of operation. For Sunnica West Site B, visual effects at year 15 of operation are predicted to range between neutral and negligible adverse. The assessment concluded that due to the distance between the various parts of the Scheme, i.e. between Sunnica East Site A and Sunnica East Site B, none of the identified visual receptors would have views across the Scheme in its entirety at	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

				<p>year 15 and no combined significant adverse visual effects have been identified.</p> <p>The Socio-economics and Human Health assessments in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] do not directly assess quality of life but it is possible to infer conclusions from the findings. The beneficial and adverse effects that are related to quality of life have been compiled for both the construction and decommissioning phases, and the operating phase.</p> <p>The construction and decommissioning phases will result in temporary effects that could impact quality of life. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] identifies beneficial effects including benefits to the local economy through the creation of construction employment and related Gross Value Added (GVA). Chapter 15: Human Health of the Environmental Statement [APP-047] identifies beneficial effects including the provision of access to local employment and training opportunities, as well as opportunities for work for local people via local procurement arrangements. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] also</p>	
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				<p>identifies adverse effects that could impact quality of life, including impacts to users of PRowS, some of which require temporary closures and diversions during the construction and decommissioning phase. Chapter 15: Human Health of the Environmental Statement [APP-047] identifies adverse effects on accessibility and active travel, and for connection of existing communities, both as a result of the temporary PRow closures and diversions during the construction and decommissioning phases.</p> <p>The operation stage features permanent effects that will be relevant to quality of life. Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] identifies beneficial effects including benefits to the local economy through the creation of operational employment and related GVA. There will also be new permissive paths created as a result of the Scheme, which can have a quality of life benefit for users. Chapter 15: Human Health of the Environmental Statement [APP-047] identifies beneficial effects including opportunities for work for local people via local procurement arrangements, as well as benefits for accessibility and active travel, and the connection of existing communities, both as a result of the new permissive routes.</p>	
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SCC-55	Other	Cumulative effects	<p>The intra- and inter-cumulative, and sequential effects, on landscape character and on recreational and transport users of highways, Public Rights of Way, promoted and cycle routes will need to be fully explored and minimised.</p>	<p>Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Intra project effects, including changes to how the landscape is experienced from routes (highways, PRowS and others), including sequential effects and cumulative effects have been considered in detail in Chapter 10, Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices and avoided or minimised through the iterative design process. This provides a detailed assessment of landscape and visual effects on each receptor in relation to each site within the Scheme and also the Scheme as a whole. This allows distinctions to be drawn between the impacts which would arise from separate parts of the Scheme and intra-project effects which would arise from the Scheme as a whole. The scheme has been designed to minimise the number and duration of Public Rights of Way (PRow) closures. The proposed closure of eight PRowS are outlined within Chapter 13, Transport and Access of the Environmental Statement [APP-045] and Traffic Regulation Measures Plans - Road Closures [APP-009 to APP-011]. The closure of the PRowS are expected to be no more than three weeks, which is considered a worst-case scenario and therefore not considered to have a</p>	<p>The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.</p>
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				<p>significant or long- term impact. The closures cannot be programmed at this stage of the project, but it is likely that, due to their purpose, they will not occur simultaneously and will therefore have isolated, rather than cumulative, impacts. Regarding the impact the site accesses have on landscaping, the initial site access review identified the vegetation removed/trimming required to accommodate the full visibility splay requirements based on the speed limit of the highway (e.g., 60mph/100kph = 215m visibility splay). Therefore, the site access strategy was developed to include temporary speed reductions and temporary traffic signals to substantially reduce the amount of vegetation to be removed/trimmed as embedded mitigation.</p>	
SCC-56	Landscape and visual amenity	Visual representations	<p>Concerns remain with regards to the visualisation of the visual effects of the scheme, and some judgements made as part of the landscape and visual assessment process.</p>	<p>The visualisations for the Scheme have been prepared in line with best practice, including Landscape Institute Technical Guide Note 06/19. The methodology setting out the approach is provided in Appendix 10C: Landscape and Visual Impact Assessment Methodology [APP-102]. Judgements made in relation to likely visual effects of the Scheme have been considered in detail and made with reference to the methodology and minimised through the iterative design process.</p>	<p>The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.</p>

SCC-57	Landscape and visual amenity	Road improvements	Elements of the scheme, such as proposed road improvements, within settlements and in the countryside, have not been included in the Landscape and Visual Assessment (LVIA) [APP042], despite their potential to have adverse effects (such as urbanisation, loss of vegetation and visual amenity) in the rural landscape.	All aspects of the Scheme relevant to landscape and visual effects have been considered in the Landscape and Visual Impact Assessment summarised in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP- 042] . This includes the mitigation for other topics set out in the Schedule of Environmental Mitigation [APP-257] . Road improvements proposed are minor and localised and have been designed to minimise landscape and visual impacts in line with the principles set out in the Design and Access Statement [APP-264] .	This comment is noted.
SCC-58	Landscape and visual amenity	Visual representations	Visual receptors do not reflect previous requests by SCC to demonstrate the impact for other users of the Public Right of Way U6006. Visual impact height remains at 1.6 metres and additional height not included as previously requested. This does not give a true impact for all users, included increased height for equestrian use. (APP 216, viewpoints 15 to 16).	<p>Impacts on users of U6006 have been assessed in detail with reference to four viewpoints (15, 15A, 15B, 16) representing sequential views along the route. It is considered that these viewpoints provide a range of views sufficient to support the written descriptions of the baseline and predicted changes.</p> <p>As explained in paragraph 2.1.6 of Appendix 10C: Landscape and Visual Impact Assessment Methodology [APP-102], “as part of the fieldwork, visual analysis was also made in relation to horse riders on routes which they were considered to use, e.g. U6006 between Elms Road and Worlington. In order to note their views (given the additional height of horse riders) the assessors stood on a step ladder. The</p>	The provision of further information is noted. The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

				<p>photography from these locations has been taken from a person's eye height as standing on the ground, to represent a pedestrian, as these were considered the more representative user of the routes."</p> <p>Therefore, because the assessor stood on a step ladder at the locations of the relevant viewpoints, the impacts on horse riders using equestrian routes has been considered with respect to their elevated position above the landscape.</p> <p>A further set of Zones of Theoretical Visibility (ZTVs) have been prepared to illustrate the likely extent of views of horse riders based on an eye height of 2.7m above ground level (Appendix C of this Relevant Representation response document). A comparison between these ZTVs and those representing the eye height of pedestrians (1.7m above ground level) demonstrate very little difference in the theoretical extent of visibility.</p>	
SCC-59	Landscape and visual amenity	Cumulative effects	Cumulative effects with other schemes (see section 10.11 of [APP-042]) do not appear to be fully integrated within the assessments of landscape and visual effects.	<p>The assessment of cumulative landscape and visual effects is set out in section 10 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. It is based on the 'combined' impacts and effects of the Scheme with the cumulative schemes set out in Appendix 5A of the Environmental Statement [APP-055] and is separate from the assessment of the</p>	<p>This comment is noted.</p> <p>Section 20 of the joint LIR on cumulative impacts outlines schemes that the Councils foresee as having potential interrelations with the Applicant's project. Table 18 includes three further</p>

				<p>landscape and visual effects of the Scheme in isolation. This is common practice to draw clear distinctions.</p> <p>Regarding North Angle Solar Farm (CCC/20/051/FUL and CCC/21/237/VAR), this scheme lies to the west of Soham and outside of the study area defined for the LVIA. It was therefore scoped out of the assessment of likely cumulative landscape and visual effects presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. An assessment of the cumulative effects of the proposed Breach Solar Farm (21/00706/ESF) has now been made and is included in Appendix A of this Relevant Representations response document. It concludes that there would be moderate adverse cumulative effects on local landscape character area (LLCA) 36: Burwell Fen during construction, which are considered significant. These effects would be short term and temporary. Effects during operation and decommissioning would not be significant.</p>	<p>developments which are important to be considered by the Applicant in their cumulative assessment and are not included in Appendix 5A of the ES [APP-055]. The Councils consider it essential for these to be included.</p>
SCC-60	Landscape and visual amenity	Cumulative effects	Given the scale of the proposal, and the consequent accumulation of non-significant effects, it will be essential to address and minimise these as far as possible, as in-combination non-significant repeated or sequential visual effects will become significant.	Effects on the landscape as a resource in its own right and effects on people's views of the landscape have been considered separately in line with best practice. Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and associated appendices provides a detailed assessment of landscape and	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

				visual effects on each receptor. This includes an assessment of landscape effects at different scales and on sequential views from roads and public rights of way, which have been assessed with reference to representative viewpoints. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects (whether significant or non-significant) on the character of the landscape experienced along the route and views of the landscape. This is in line with the agreed methodology and the proportional approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition.	
SCC-61	Operations	Operating life	It is understood by SCC that shortening the life of the project may not be a viable prospect. In this case, it is our view that the additional accumulation of impacts of the longer period may require careful balancing and mitigation beyond the basic expectations of the draft policy.	<p>The Applicant does not agree that the proposed duration of the Scheme is <i>“beyond the basic expectations of the draft policy”</i>.</p> <p>Paragraph 2.49.9 of draft NPS EN-3 acknowledges that the design life of solar panels can sometimes be longer than 30 years. It goes on to state that <i>“Applicants may apply for consent for a specified period, based on the design life of the panels.”</i></p> <p>Chapter 3, Scheme Description, of the Environmental Statement [APP-035] sets out at paragraph 3.2.4 c that the operational life of the Scheme is 40 years. In accordance with Paragraph 2.49.9 of</p>	This comment is noted.

				<p>draft NPS EN-3, the Applicant is seeking consent for the design life of the Scheme. As set out by paragraph 6.3.23 of Chapter 6: Climate Change of the Environmental Statement [APP-038], an indicative solar PV module type has been considered, which would have a warranty covering the first 30 years. The paragraph goes on to explain that PV panel degradation over time (from 0-40 years) has also been factored into calculations for the performance of the Solar PV modules in assessing the climate change impact of the Scheme. It would not be an efficient use of resources to arbitrarily require the decommissioning of an operational solar farm after 25 years, which would be 15 years before the end of its design life and 5 years before the end of the warranty period for the solar PV arrays.</p> <p>In accordance with the above paragraph, PV panel degradation over time (from 0-40 years) has also been factored in to calculations for the performance of the Solar PV modules. No wholesale replacement of solar PV arrays is anticipated. In any case, the DCO application seeks authorisation to construct, operate and maintain the Sunnica Energy Farm. Article 2 of the draft DCO [APP-019] defines the meaning of “maintain” in the draft DCO. This sets out that the definition does not include</p>	
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				removal, reconstruction or replacement of the whole of the authorised development. Article 5(3) of the draft DCO [APP-019] also sets out that the carrying out of any maintenance works which are likely to give rise to any materially new or materially different effects that have not been assessed in the Environmental Statement would not be authorised. Therefore, the substantial replacement of solar array equipment would not be authorised by the DCO if it would lead to any materially new or materially different effects to those assessed by the Environmental Statement, including operational impacts on themes such as Traffic and Transport and Socio-economics.	
SCC-62	Landscape and visual amenity	Visual impact	The aim for landscape design and mitigation should be to retain the legibility and character of the landscape and, ideally, to reduce the visual effects to zero, where possible, especially for visual receptors, at the edges of settlements, and along routes connecting settlements.	The aim of the landscape design and mitigation has been to retain the legibility of the landscape and to avoid (i.e. reduce to zero) or otherwise minimise adverse impacts on its character and views of the landscape. This has been achieved by offsetting development from settlement boundaries, road and public rights of way, retaining existing vegetation within and on the boundaries of the site and reinforcing the Green Infrastructure through additional planting which reflects the character of the landscape, as shown in the Landscape Masterplans presented in Figures 10 – 14a to 10-14f of the Environmental Statement [APP- 209 to APP-214] . The vision and design principles for the landscape design	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

				are set out in the Landscape and Ecology Management Plan [APP-108] and the Design and Access Statement [APP-264] . Visual materials, including the photomontages are presented in Figures 10-20a to 10-102 of the Environmental Statement [APP-215 to APP-232] .	
SCC-63	Landscape and visual amenity	Design	As the mitigation must be appropriate to the local landscape character, it may not be possible to screen the solar panels from all visual receptors. For these areas positive place making is required and the Applicant needs to provide innovative design solutions which demonstrate that, although the panel arrays may be visible, they sit well within the landscape, are not dominant or too prominent, and do not detract significantly from it.	The Landscape and Visual Impact Assessment presented in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] , read alongside the visual baseline presented in Appendix 10F of the Environmental Statement [APP-105] and the detailed assessment of visual effects presented in Appendix 10H of the Environmental Statement [APP-107] identifies locations where there would be views of solar panels and other structures. The aim of the landscape design and mitigation has been to retain the legibility of the landscape and to avoid (i.e. reduce to zero) or otherwise minimise adverse impacts on its character and views of the landscape. This has been achieved wherever possible by offsetting development from settlement boundaries, road and public rights of way, retaining existing vegetation within and on the boundaries of the site and reinforcing the Green Infrastructure through additional planting which reflects the character of the landscape, as shown in the Landscape Masterplans presented in Figures 10 – 14a to 10-14f of the Environmental Statement	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

				<p>[APP-209 to APP-214]. This means that, even where solar panel arrays are visible, they will generally be at a distance from the viewer and in the context of retained vegetation and proposed planting, minimising the scale of impacts. The vision and design principles for the landscape design are set out in the Landscape and Ecology Management Plan [APP-108] and the Design and Access Statement [APP-264]. Visual materials, including the photomontages presented in Figures 10-20a to 10-102 of the Environmental Statement [APP-215 to APP-232].</p>	
SCC-66	Landscape and visual amenity	Design	<p>The network of existing environmental features should be retained and enhanced as part of the vision in the Landscape and Ecology Management Plan (LEMP) [APP-108], along with new features that are required and proposed by that plan. Together these will form the framework in which the development will sit.</p>	<p>The LEMP [APP-108] retains, enhances and manages existing features and proposes new features as part of the Scheme. Further detail on these measures and how habitat creation will link to form a coherent biodiversity network including their long term management will be set out in the detailed LEMP to be approved by ECDC and WSC at the detailed design stage.</p>	<p>The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.</p>
SCC-67	Landscape and visual amenity	Mitigation	<p>A key component in the success or otherwise, of the project's Green Infrastructure will be effective management, in the short and long term, and this should be part of the LEMP vision. Inconsistencies within the Environmental Statement (ES) with regards to the retention of the gained Green Infrastructure</p>	<p>The Landscape and Ecology Management Plan [APP-108] submitted with the application sets out the framework for the management and maintenance of existing and proposed Green Infrastructure within the Scheme. This addresses each landscape element type separately, setting out the initial maintenance that will be carried out to establish new habitats and long-term management of existing and proposed</p>	<p>The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.</p>

			post decommission, create uncertainty.	<p>vegetation.</p> <p>The vision and principles for the proposed Green Infrastructure are set out in the Landscape and Ecology Management Plan [APP-108] and it is not proposed that GI will be removed at decommissioning. If after decommissioning a landowner decides to remove vegetation, this would be subject to applicable planning or licensing requirements.</p>	
SCC-68	Landscape and visual amenity	Mitigation	If the intention is for the proposed Green Infrastructure to reflect the surrounding landscape character and context, this should be part of the overall LEMP vision.	As stated in paragraph 1.3.2 of the Landscape and Ecology Management Plan [APP-108] , the Plan has been developed to ensure that the Scheme would reflect the existing landscape character and context, whilst accommodating mitigation principles established within the Environmental Statement. This has been a key consideration throughout the iterative assessment and design process and is linked to the review of published landscape character assessments and the definition of local landscape character areas (LLCA) by the Applicant, as set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] .	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.
SCC-69	Landscape and visual amenity	Mitigation	Landscape proposals should be tailored to the location, and conditions and required functions of each site, noting that these change across the DCO site. Therefore, specific design	As stated in paragraph 1.3.2 of the Landscape and Ecology Management Plan [APP-108] , the Plan has been developed to ensure that the Scheme would reflect the existing landscape character and context, whilst accommodating mitigation	The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.

			<p>solutions and management prescriptions will be required. The current proposals (as set out in the LEMP) do not seem to embrace this approach sufficiently.</p>	<p>principles established within the ES. This has been a key consideration throughout the iterative assessment and design process and is linked to the review of published landscape character assessments and the definition of local landscape character areas (LLCA) by the Applicant, as set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042]. An example within Suffolk is the setbacks and planting proposed along the route of U6006 south of Worlington.</p> <p>This Landscape and Ecology Management Plan [APP-108] is outline and is intended to be further developed post- consent for approval by the local planning authority. Paragraph 1.1.4 states that “this OLEMP provides a framework for achieving the ‘vision’ of the Landscaping Masterplan, as illustrated on Figures 1 to 6, in Annex A. Detailed landscaping and ecological management plans will be approved by the relevant local planning authority and will be required to be in accordance with this OLEMP”.</p>	
SCC-70	Landscape and visual amenity	Mitigation	<p>The continued lack of relevant detail (for example, with regards to the spatial arrangement of various components of infrastructure in each parcel; the quantification of vegetation</p>	<p>The Application documents provide sufficient detail to make full and clear judgements on the likely landscape and visual effects of the Scheme.</p> <p>The spatial arrangement of various components of infrastructure in each</p>	<p>The Council and the Applicant have committed to further detailed discussions to resolve a number of landscape issues.</p>

			<p>losses; the consideration of required visibility splays for access points and their impact on roadside trees and hedges; the design of access points; etc.) does not promote the full and clear understanding of the landscape and visual effects of the proposals.</p>	<p>parcel is shown on the Parameter Plans in Figure 3-1 of the Environmental Statement for Sunnica East [APP-135] and Figure 3-2 of the Environmental Statement for Sunnica West [APP-136]. These should be read alongside other figures in the Application, which provide details on the design and arrangement of individual elements [APP-137 to APP-161].</p> <p>The Biodiversity Net Gain Assessment [APP-259] and the Tree Constraints Report [APP-101] provide information on changes in existing habitats as a consequence of the Scheme.</p> <p>See response SCC-55, SCC-117 and SCC-118 regarding visibility splay considerations. Where access points and visibility splays are a requirement, detailed tree survey input would inform the volume of tree removals required and the safety of those trees. This will be secured pursuant to amendments to the DCO (to make vegetation removal under the definition of ‘permitted preliminary works’ to require a LEMP for those works) to be brought forward in the next update of the DCO to be submitted to Examination.</p>	
SCC-71	Land use	Assessment	<p>The socio-economic assessment [APP-044] fails to correctly assess the likely effects of the project proposal on socioeconomics, and</p>	<p>The employment and socio-economic benefits of the Scheme are as reported in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044].</p>	<p>The Council respectfully maintains its position, but looks forward to continued discussion to resolve this issue.</p>

			<p>all conclusions with regards to impacts and effects of the scheme presented to date are therefore inadequately supported by the available evidence presented as part of the application.</p>	<p>This reports that there is a significant temporary beneficial effect arising from the generation of construction and decommissioning employment and from the associated increase in gross value added (GVA) during construction and decommissioning respectively. The Applicant considers that the approach taken to the modelling underpinning assessment of construction employment generation presented in the chapter is considered to be acceptable and robust, as it is based on good practice guidance (HCA Additionality Guidance) and sources such as published reports (CEBR, Centre for Economics and Business Research). The conclusions of the assessment are considered to be sound both based on this and on previous experience.</p> <p>The Applicant is engaging with SCC to try and address its concerns with Sunnica's assessment. It will update the examination in due course once these discussions have been progressed further.</p>	
SCC-72	Land use	Assessment	<p>SCC has significant concerns with how the Applicant has modelled their labour assumptions, and their use of ready reckoners taken from the Homes and Communities Agency (HCA) Additionality Guidance. The use of these ready reckoners implies a misunderstanding of correct</p>	<p>The Applicant considers that the approach taken to the modelling underpinning assessment of construction employment generation presented in the chapter is considered to be acceptable and robust, as it is based on good practice guidance (HCA Additionality Guidance) and sources such as published reports (CEBR, Centre for Economics and Business Research).</p>	<p>The Council respectfully maintains its position, but looks forward to continued discussion to resolve this issue.</p>

			modelling principles.		
SCC-73	Land use	Assessment	<p>In their labour modelling the Applicant has assumed that 100% of the workforce needed to deliver this project is available within a 45- minute travel time of the site and then further compounded this error through the assumption that all indirect and induced benefit will also occur within the same 45-minute travel zone. This would only be true if the entirety of the supply chain needed to deliver this project is located within the travel study area, which is highly unlikely.</p>	<p>The modelling including in Chapter 12: Socio-economics and Land Use in the ES [APP-044] does not assume 100% of the labour will come from the 45-minute travel area. The calculations take into account estimated leakage of 12%, resulting in an assumption of 88% of labour coming from within the 45-minute travel area. The Applicant considers that the approach taken to the modelling of this as presented in the chapter is considered to be acceptable, as it is based on good practice guidance (HCA Additionality Guidance) and sources such as published reports (such as from CEBR, Centre for Economic and Business Research).</p> <p>The Applicant is engaging with SCC to try and address its concerns with Sunnica's assessment. It will update the examination in due course once these discussions have been progressed further.</p>	<p>Para 12.17 – 12.22 of the joint LIR further outline the Councils concerns regarding the inadequacy of socio-economic assessments.</p>
SCC-74	Land use	Assessment	<p>SCC expects the Applicant to identify the different skills required across their total workforce, and then the propensity and flexibility of the labour market within the 45-minute travel study area to fill these identified roles. Until the Applicant has done this very basic</p>	<p>The Applicant considers that the approach taken to the definition of a study area and the labour market underpinning assessment of construction employment generation presented in Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] is considered to be appropriate as it is based on good practice guidance (HCA</p>	<p>Para 12.29 of the joint LIR outlines the Councils expectations.</p>

			work, to understand where their prospective workforce is likely to come from, the effect of any conclusions reached for socio-economics, transport, accommodation, healthcare services, local amenities, businesses and residents, are completely flawed and therefore should be disregarded.	<p>Additionality Guidance). The conclusions of the assessment are considered to be sound both on this basis and previous experience.</p> <p>The Applicant is engaging with SCC to try and address its concerns with Sunnica's assessment. It will update the examination in due course once these discussions have been progressed further.</p>	
SCC-75	Land use	Agricultural land classification data	Concerns have been raised by the local community in relation to the applicant's assessment of Agricultural Land Classification for the scheme. Suffolk County Council has not to date been able to provide a detailed critique of the assessment owing to a lack of in-house expertise. However, the issue is relevant to national policy as set out in NPS EN-1 and SCC would therefore be keen for these concerns it to be explored and resolved during the examination.	<p>The Applicant has submitted a detailed ALC assessment [APP-238] [APP-239] that follows the recommendations given by Natural England in TIN049. This assessment includes work by two previous survey teams, one for the consented minerals site and work by the former MAFF ALC survey team. Natural England provide ALC expertise to planning authorities.</p> <p>The National Policy Statement for Energy EN-1 para 5.10.15 states "The [Secretary of State] should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy."</p>	This comment is noted.

				<p>Para 5.10.8 states “Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations.”</p> <p>In addition, NPS EN-1 paragraph 5.10.15 states that the decision maker “...<i>should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5)...</i>”. This is reaffirmed by paragraph 5.11.14 of draft NPS EN-1 which preserves the existing guidance of EN-1 para 5.10.15 as given above. Draft NPS EN3 para 2.48.13 also recommends that ground mounted solar should avoid the best and most versatile cropland where possible, but also concludes “<i>However, land type should not be a predominating factor in determining the suitability of the site location.</i>”</p> <p>ALC assessment work for the Scheme has been undertaken in accordance with the available guidance by suitably qualified experts. This assessment work shows that the site is predominantly in ALC Grades 3b and 4, with only a marginal area (less than 4%) of Grade 3a land, the lowest quality of agricultural land considered to be Best and Most Versatile. This Grade 3a land resource</p>	
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				<p>will not be lost as the development consent is temporary, with land continuing in agricultural use through the operational period of the development.</p> <p>With only a marginal extent of best and most versatile land the selection of the site has minimised the use of best and most versatile land. This temporary use of a small area of Grade 3a land should be considered against other sustainability considerations such as the need to rapidly displace fossil fuel use.</p> <p>Suffolk County Council does not need in-house expertise on ALC as it can draw upon the technical expertise provided by Natural England. In the absence of any concern from Natural England regarding the ALC assessment, Suffolk County Council should note the above National Policy Statement guidance and give little weight to the loss of poorer quality agricultural land.</p>	
SCC-76	Transport and access	Consultation	<p>Consultation by the Applicant on transport matters has been minimal. SCC disputes the numerous references (e.g. in the Consultation Report [APP-030]) claiming that the Applicant has continued to engage with the host authorities.</p>	<p>The Applicant respectfully disagrees. Pre-PEIR consultation was undertaken with both LHAs for the PEIR (July 2019).</p> <p>Post-PEIR and pre-Environmental Statement, two meetings were held with the LHAs (March & August 2021) and an additional meeting held with National Highways (May 2021) which identified the approach for the Environmental Statement.</p>	<p>The Council respectfully maintains this comment, but looks forward to continued discussion to resolve this issue.</p>

				Further consultation was undertaken via email correspondence with SCC regarding specific topics such as the use of the Newmarket Road/Worlington Road Junction (October 2021). In addition, the site access on Golf Links Road has been relocated based on consultation feedback. The Applicant is looking to continue to engage with the LHA through the SoCG and the Examination process.	
SCC-77	Transport and access	Consultation	The four authorities provided a detailed response to the PEIR. However, many of the issues raised in this have not satisfactorily been addressed by the Applicant. In some cases SCC's response has been taken out of context and presented as showing that SCC had agreed the method of assessing environmental impacts [APP-030].	It is unclear which responses are in question, further clarification is required as this is not the intention of the Applicant to take a response out of context. However, if there are particular responses in question then the Applicant seeks to agree on the way forward with dealing with the comment.	The Council looks forward to continued discussion to resolve this issue.
SCC-78	Transport and access	Consultation	During the initial review of the submitted documents SCC has identified shortcomings in the content that made them inadequate for evaluating the impact of this project on the transport network. Regrettably, the Applicant has not taken opportunity to rectify these prior to submission and this means that a great deal of remedial work will have to be concentrated in the 6-month examination period.	The Applicant respectfully disagrees with the statement that it is not possible to evaluate the impact of the project based on the information provided. Following the submission of the PEIR and the response received, Chapter 13: Transport and Access of the Environmental Statement [APP-045], Appendix 13B (Transport Assessment) of the Environmental Statement [APP-117] and Appendix 13C (Framework Construction Traffic Management Plan and Travel Plan) of the Environmental Statement [APP-118] underwent	The Council looks forward to continued discussion to resolve this issue.

			<p>This will require considerable resources at a time when SCC is involved in the delivery of a number of NSIPs and the consultations of others.</p>	<p>significant updates with historic traffic flows obtained for inclusion within the Environmental Statement and with further work carried out at the request of the LHA e.g. various speed surveys, a Stage 1 Road Safety Audit and consultation regarding escorting HGVs through the Newmarket Road/Worlington junction. Presentations were made to the LHAs in March and August 2021, which set out in substantial detail the revised approach to the transport work following the PEIR, with the LHAs being provided the opportunity to make comments at this stage.</p> <p>The transport impact is outlined in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117] with further information including mitigation outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118], the Traffic Regulation Measures Plans - Road Closures [APP-009 – APP-011] and Traffic Regulation Measures Plans - Temporary Measures [APP-012 - APP- 013].</p>	
SCC-79	Transport and access	Protective provisions	<p>The dDCO does not include sufficient protection for SCC as the Local Highways Authority either through requirements or protective provisions. The dDCO is not acceptable in its submitted form and falls considerably short in terms of quality and content compared to similar orders</p>	<p>The Applicant respectfully disagrees and the Council is adequately protected in the draft DCO [APP-019] with provisions that reflect those contained in other approved DCOs.</p> <p>Article 9 sets out the proposed power to make alterations to streets. It contains</p>	<p>Further detail is provided in section 13 of the LIR and in the Council's submissions at ISH1.</p>

			recently presented for examination.	<p>specific powers in paragraph (1) in relation to the permanent alterations to streets contained in Part 1 of Schedule 5 and the temporary alterations in Part 2 of that Schedule. It also contains a general power that is exercisable only with the consent of the street authority, which, in the case of any street maintained by SCC will be SCC.</p> <p>In terms of the specific power in article 9, SCC should note that article 10 (construction and maintenance of altered streets) addresses this. In relation to the permanent alterations of streets contained in Part 1 of Schedule 5, paragraph (1) of article 10 makes it clear that these “must be completed to the reasonable satisfaction of the highway authority”, providing a clear incentive for the undertaker to seek SCC’s agreement to the designs to be employed.</p> <p>In relation to the temporary alterations contained in Part 2 of Schedule 5, again, paragraph (2) ensures that these must be completed to the reasonable satisfaction of the street authority (being SCC in the case of its road) and are to be maintained by the undertaker for the duration of the temporary alterations and for 12 months after their restoration (see para (3)).</p>	
SCC-80	Transport and access	DCO conditions	The schedules such as those for road closures and speed restrictions have yet to be	The Temporary Traffic Management and Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] are integral	Further detail is provided in section 13 of the LIR and in the Council’s submissions at ISH1.

			assessed in detail. Experience has shown that significant resources are required to check these to ensure they are accurate and therefore enforceable.	to the mitigation proposed. These plans should be read alongside the DCO Schedules, both of which have been prepared carefully following the results of the design process and assessment process. Any specific comments on these Plans and Schedules would be welcomed.	
SCC-81	Transport and access	DCO conditions	There is no requirement within the dDCO requiring approval of highway works by SCC and therefore no control on the detailed design of the accesses.	See Response to SCC-79.	No response required.
SCC-82	Transport and access	Access	Further discussion is required regarding the proposed inclusion of authorisation of use of motor vehicles along and across Public Rights of Way.	The Applicant would welcome further discussions with SCC on this topic.	The Council looks forward to further discussions.
SCC-83	Construction	Access	SCC is continuing to review the Works Plans [APP-007], Access and Rights of Way Plans [APP-008] and will provide detailed comments in the LIR.	This comment is noted.	Refer to “Annex F: Transport – Comments on the draft DCO and Supporting Documents” of the joint LIR.
SCC-84	Transport and access	Safety	At A14/A142 junction 37 heavy vehicles have to ‘boomerang’ due to the movement constraints at the A11/A14 junction 38 (as there is no connection between A14 westbound and A11 northbound or A11 southbound and A14 eastbound). This junction has a poor safety record with a number of crashes recorded at the junction of the slip roads and the	Further consultation regarding the A14/A142 J37 is currently being undertaken with discussions regarding appropriate action to be taken. The Applicant has agreed to review information signposted by the LHA in this regard.	This comment is noted. SCC awaits further engagement.

			A142 and reported congestion.		
SCC-85	Transport and access	Safety	The restricted movements at the A11/A14 junction will also result in light vehicles travelling cross country between the A11 and A14 through Red Lodge, Kennet or Tuddenham as reflected in the Applicants forecast (Transport Assessment Annex F). The layout of this junction has a significant impact on traffic movements associated with this development which is not reflected in the TA (3.4.3).	The Applicant respectfully disagrees with the statement that this is not reflected in the Transport Assessment [APP- 117] . The restricted movements at the A11/A14 have been considered within the assignment of the construction staff vehicles as set out in the Transport Assessment. As commented in the LHA response, the Transport Assessment identifies vehicle travelling through Red Lodge as reflected in the Transport Assessment Annex F [APP- 117] .	The Council looks forward to picking up this point in discussions.
SCC-86	Transport and access	Safety	The suitability of narrow rural lanes for construction traffic is a concern. An unusual feature (for Suffolk) is that many of the minor roads are relatively straight and hence can give the impression they can be driven at speed. However, sharp bends and vegetation make high speeds hazardous (see Framework Construction Transport Management Plan and Travel Plan [APP-118] Table 6-1).	In order to provide safe entry and egress to the site accesses, a strategy for access was developed, following the assessment work set out in the Framework CTMP & TP [APP- 118] which included temporary speed limit reductions, temporary traffic signals, provision of appropriate signage warning users of the upcoming construction site access. As an example, the Golf Links Road site access was relocated as a result of the consultation, speed surveys were undertaken at the request of the LHA and a Stage 1 Road Safety Audit was undertaken at the request of the LHA.	Further detail is provided in section 13 of the LIR, and the Council respectfully maintains its position.
SCC-87	Transport and access	Safety	There is a lack of concern for vulnerable road users within the submission documents, for example by assuming their	The Applicant respectfully disagrees that there is a lack of concern for vulnerable road users. Section 13.8 of Chapter 13: Transport and Access of the Environmental	The Council respectfully maintains its position, and suggests that this point could be picked up in discussions with

			<p>absence in the Transport and Access Environmental Statement chapter [APP-045]. Although the data has limitations in providing a robust quantum, SCC has access to data that shows there is some use of the local highway network by cyclists and pedestrians including between the hours of 0600 to 0700 and 1900-2000.</p>	<p>Statement [APP-045] assesses the impact on Vulnerable Road Users (in the form of Non-Motorised Users) in a number of respects. In line with the IEMA guidance, link sensitivity for Non-Motorised Users (NMUs) is assessed, and the magnitude of increases in traffic flows and HGVs is identified in order to assess the impact of the increased traffic flows and HGVs.</p> <p>The impact on PRowWs is also included within Section 13.8 of Chapter 13: Transport and Access of the Environmental Statement [APP-045], with eight temporary closures required during the construction period. The closures of PRowWs are expected to be for a maximum of three weeks which is forecast to be the worst-case scenario.</p> <p>Further discussion with SCC has identified that the data referred to is Strava usage data, which they are not able to share, and that they recognise the limitations as a data source. The Environmental Statement does not state that there is no use of the local highway by pedestrians and cyclists at these times, but that the usage is assumed to be low. It is not in dispute that the relevant PRowWs are used, but there is no evidence to suggest that their level of usage would be sufficiently high as to justify any changes to sensitivity category away from that set out in the ES. As such, it remains</p>	<p>the Applicant.</p>
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				that a high degree of confidence can be held in the conclusions on the effects to NMUs.	
SCC-88	Land use	Public rights of way	Permissive Access proposed is limited and not all opportunities explored within the landscape buffers. Given the time-limited nature of the proposals there is concern that these would not be permanent improvements to the Public Rights of Way network, lasting beyond decommissioning. Details of users of proposed access also not stated. Consideration needs to be beyond pedestrian use and to include access for non-motorised users.	The Permissive Paths are to be provided by the Applicant for the duration of the Scheme, in accordance with the provisions of requirement 21 of the draft DCO [APP-109] . The Permissive Paths are not intended to be a public highway. Requirement 21 of the draft DCO [APP-019] requires the approval by the relevant planning of the details of the permissive paths, including their specification and maintenance regime, prior to their construction and requires the permissive paths to made available for public use before the final commissioning of the phase of the development to which they relate.	Issues related to provision of permissive paths are covered in more detail in section 14 of the LIR.
SCC-89	Land use	Public rights of way	It is noted that routes are incorrectly referenced within the document as Footpaths and do not show their correct higher legal status, Bridleway, Restricted Byway. This (Table 10-7: Visual Receptor Sensitivity) provides a false impression of status and users of specific Public Rights of Way.	The Applicant notes that the type of public right of way is generalised in table 10-7 of Chapter 10: Landscape and Visual Amenity of the Environmental Statement [APP-042] and in Figure 10-4 [APP-194] . An updated figure (refer to Figure 1 in Appendix B of this Relevant Representations response document) will be submitted to the Examination to provide this information at Deadline 1. This does not alter the definition of associated visual receptors or their sensitivity, which is based on the methodology set out in Appendix 10C of the Environmental Statement APP-102] .	This comment is noted.

SCC-90	Human health	Battery fire safety	<p>The Applicant has produced an Outline Battery Fire Safety Management Plan [APP267] which appears to meet the requirements SCC outlined during the consultation process. Therefore, subject to the relevant control documents being secured by the draft DCO, it is unlikely that SCC will object to this aspect of the development on fire safety grounds. This will be explored in more detail in the LIR, as it should be noted that SCC does not have sufficient in-house expertise to be able to evaluate the submitted appendix on Unplanned Atmospheric Emissions from Battery Energy Storage Systems [APP-124].</p>	<p>The draft Development Consent Order [APP-019] includes requirement 7 in Schedule 2 which secures the Battery Fire Safety Management Plan (“BFSMP”). The BFSMP is to be approved by the relevant planning authorities, in consultation with the fire and rescue services. The BFSMP must be in accordance with the Outline BFSMP which accompanies the application [APP-267]. If SCC accepts that the Outline BFSMP then the Applicant will seek to agree this in a Statement of Common Ground.</p> <p>The Applicant notes the comments concerning the appendix on Unplanned Atmospheric Emissions from Battery Energy Storage Systems [APP-124]. An initial conservative air quality risk assessment has been undertaken. However, a traditional consequence modelling exercise will be undertaken once the detailed design is known and before operation begins. Consequence modelling requires detailed input data regarding the emissions etc., which is why it has not been undertaken at this stage.</p>	<p>Further detail on this issue is provided in the LIR at section 18, and in response to ExQ1 submitted alongside this document.</p>
SCC-91	Transport and access	Assessment	<p>SCC has, contrary to comments made by the Applicant, not agreed to the methodology used for the transport and access assessment, and on review, the assessment is not considered acceptable.</p>	<p>Pre-PEIR consultation was undertaken with both LHAs for the PEIR (July 2019). Post-PEIR and pre-Environmental Statement, two meetings were held with the LHAs (March & August 2021) and an additional meeting held with National Highways (May 2021) which identified the approach for the</p>	<p>The Council looks forward to picking up this point in discussions.</p>

				<p>Environmental Statement. Further consultation was undertaken via email correspondence with SCC regarding specific topics such as the use of the Newmarket Road/Worlington Road Junction (October 2021). In addition, the site access on Golf Links Road has been relocated based on consultation feedback. Notwithstanding this, the Applicant seeks to agree an acceptable methodology and conclusions and therefore continue to work towards addressing the specific points raised by SCC within this document through the SoCG and the Examination process.</p>	
SCC-92	Transport and access	Assessment	<p>Table 13-3 (page 13-24) of the ES sets out the main issues raised during consultation, with regards to link sensitivity the Applicant has set out that SCC made the following comment: "Categorisation does not appear to be unreasonable and should be agreed with the relevant highway authority". However, the statement provided in SCC's consultation response was actually: "Although the method of categorisation does not appear to be unreasonable, <u>given the relatively small number of links being assessed, and that an absence of facilities does not necessarily mean an absence of</u></p>	<p>Table 13-3 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] summarises the responses from various consultees and was abbreviated for succinctness. It is not the intention of the Applicant to misrepresent, however, the omitted section of text does not change the meaning of the sentence as it just provides the rationale for SCC's position, which remains true.</p> <p>The link sensitivities are included within the Section 13.6 and Table 13-16 of Chapter 13: Transport and Access of the Environmental Statement [APP-045], including rationale, and await specific comment on which are not considered acceptable based on the information provided. If required, the Applicant has</p>	<p>The Council looks forward to picking up this point in discussions.</p>

			<p>users; the categorisation of each link should be agreed with the relevant highway authority."</p> <p>SCC is concerned about how this is misrepresented. The Applicant's categorisations may useful as a starting point, but as the Applicant has not sought to discuss and agree the sensitivity of the links with SCC as expected, nor investigate their use by Non-Motorised Users (NMUs), the classification of the sensitivity of the links is not considered to be acceptable, and represents a significant risk to the conclusions of the assessment. It is also believed that the additional classification based on 'highway sensitivity' has been added since consultation.</p>	<p>agreed to a meeting explaining this.</p> <p>However, the conclusion is expected to remain that it is a construction period which is short-term and temporary in nature which therefore is unlikely to change the conclusions of Chapter 13: Transport and Access of the Environmental Statement [APP-045].</p>	
SCC-93	Transport and access	Assessment	<p>There is an inappropriate assessment of sensitivity: placing the majority of local highways in the 'very low' category and hence whatever the magnitude of additional traffic the severity of the impact will be calculated as minimal.</p>	<p>The justification of the link sensitivity is clearly identified in Section 13.6 and table 13-16 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] and is considered reasonable and appropriate. As inferred in SCC's comment, there is differentiation between links, with some not being classified as very low. Based on the location, it is to be expected that the majority of links would be classified as "very low" in terms of the IEMA guidance. It is a function of the well-</p>	<p>Refer to "Annex D: Transport – Detail of Assessment Methodology Disagreements" of the joint LIR for further information regarding concerns of the Applicant's categorisation of the sensitivity of links. Particularly para 1.3, 1.13, "Table xx.x: Sensitivity and Magnitude of Impact of Links".</p>

				<p>established IEMA guidance as to how the severity of impact is calculated. It is also worth noting, that the Environmental Statement sets out the absolute and percentage increases in traffic flows, and comparison with peak hours, and is transparent in the conclusions drawn.</p> <p>As stated in SCC-92, the Applicant has agreed to a meeting on link sensitivity if required and await specific comment on which links SCC considers to have been incorrectly classified based on the information provided in the Environmental Statement.</p>	<p>The Council looks forward to picking up this point in discussions.</p>
SCC-94	Transport and access	Assessment	<p>A generic approach has been taken in the assessment ignoring local characteristics. This is particularly marked when considering pedestrians, cyclist and horse riders who are grouped as NMUs and dismissed as being too few to be of importance.</p>	<p>The Applicant respectfully disagrees with the statement that Non Motorised Users (NMUs) have been “<i>dismissed as being too few to be of importance.</i>” NMUs have been considered within Chapter 13: Transport and Access of the Environmental Statement [APP-045] in terms of the impact of the increase in vehicles as well as in the Temporary Road Closure Plans which identify the eight PRoWs that are required to be closed temporarily and the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] which identify where speed reductions and temporary traffic signals are proposed. These mitigation measures will benefit NMUs. The Scheme has been designed to minimise the closure of the PRoWs as far as is practicable with the maximum expected</p>	<p>The Council looks forward to receiving the results of usage surveys and picking up this point in discussions.</p>

				<p>length of PRowS expected to be three weeks.</p> <p>While the Applicant maintains that its assessment of the effects to NMUs is robust it has carried out additional usage surveys and will share the results with the local highway authorities once they are available.</p> <p>Table 13-16 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] identifies the link sensitivity in terms of NMUs for each of the links where traffic data was available with the methodology identified in paragraph 13.6.64.</p>	
SCC-95	Transport and access	Assessment	Professional judgement or consideration has frequently been used without evidence or substantiation. The assessment includes comments such as 'not considered /not considered likely' (12 times) or impacts are dismissed using 'professional opinion' (20 times) without reference to evidence.	<p>Where professional judgement or reference to 'not considered/ not considered likely' is referenced in Chapter 13: Transport and Access of the Environmental Statement [APP-045], justification and clarification has been provided. This includes in relation to gaps in the baseline traffic data, driver delay link sensitivity in the absence of junction capacity modelling; Saturday traffic data; splitting HGVs over a 10-hour delivery window; an additional 22 vehicles at the Freckenham junctions in relation to the magnitude of change; and the operation of the Red Lodge dumbbell roundabouts and the Dane Hill roundabout in relation to the significance of effects</p>	This comment is noted.

				when considering the forecast operation of the roundabouts in 2031 as identified in the Forest Health Local Plan. The topics identified above are considered appropriate to reference and apply professional judgement based on the experience outlined in the Environmental Statement. This judgment is applied based on extensive EIA experience by competent experts and is also a common feature of EIA methodologies.	
SCC-96	Transport and access	Assessment	SCC disagrees with the identification of trunk road slip roads as being 'very low' sensitivity, and cannot understand the rationale for this. As slip roads provide the direct connection onto the trunk roads they are clearly of strategic importance.	The Applicant respectfully disagrees and the justification and rationale is clearly set out in the section 13.6 and table 13-16 in Chapter 13: Transport and Access of the Environmental Statement [APP-045] . The Applicant agrees that the connection to the trunk road are important, but the on-slips onto the A11 and A14 are free flowing and not into a junction, and therefore the classification is reasonable.	The Council respectfully maintains its position.
SCC-97	Transport and access	Assessment	The Applicant has used an average car occupancy factor which was agreed by SCC for Sizewell C, but Sizewell C is a different project with off-site park and rides, a local bus service, site campus and a different workforce profile. It is therefore inappropriate to use the same figure without reflection on the relevant differences between the two contexts.	The average vehicle occupancy was identified from the Hinkley Point C monitoring reports. The average vehicle occupancy represents a car driver mode share of 67% with the remaining 33% to be made up of car passengers, sustainable transport modes and the mini-bus service. The average vehicle occupancy is used to identify the forecast number of construction car vehicles on the highway network. The car driver mode share of 67% is considered appropriate for the assessment of the Scheme. The remaining	The Council respectfully maintains its position.

				<p>mode share is to be made up of sustainable modes. The car driver mode share is not reliant on achieving a mode share for walking, cycling, public transport (bus & rail) or the mini-bus service. The mode share applied is considered appropriate for the assessment of the Scheme. The CTMP and Travel Plan to be submitted for approval under requirement 16 of the draft DCO [APP- 019] will further identify measures to reduce the number of construction staff vehicles such as encouraging car sharing and providing a mini-bus service to pick-up/drop-off local construction staff.</p> <p>The average car occupancy factor has been discussed with the LHAs (26 April 2022), and the Applicant has agreed to share further evidence of the validity of the assumption and is discussing carrying out a sensitivity test into the effect of varying the factor on traffic impact.</p>	
SCC-98	Transport and access	Assessment	The assessment should be aware that the AIL route used between the Port of Ipswich and Burwell diverts onto local roads to avoid weak structures on the SRN.	This comment is noted.	No response required.
SCC-99	Construction	Assessment	Paragraph 13.3.4 of the ES notes that the construction programme has been assessed as the shortest realistic programme. It sets out that a phased construction would	The information provided by the Applicant demonstrates that Sunnica East Site A & B and Sunnica West Site A & B are not to be built-out at the same rate and the two peak months do not occur at the same time.	This comment is noted

			<p>be the same or lesser in terms of effects, as previously noted for the assessment of combined effects clarification is sought on the potential for the individual peaks to occur as an 'in-combination peak' (West month 12 + East month 8 = 1,521) rather than the current assessment which is based on the busiest month of the 24 month programme (month 9 = 1,393 staff), as, if this could potentially occur, then this would represent the true worst case impact. If it cannot reasonably occur, then controls should be put on the peak number of staff movements to ensure that this is the case.</p>	<p>Section 13.8 of Chapter 13: Transport and Access of the Environmental Statement [APP-045] considers the Sunnica West Site A & B peaks individually as well as the combined peaks. The combined Scheme peak occurs in a different month to the two individual site peaks and this represents a reasonable worst-case scenario in terms of the Scheme.</p> <p>To assess a situation where both the site peaks occur at the same time, whilst it would be an absolute worst case, is not realistic and is therefore not a reasonable scenario for assessment. Subject to the Scheme receiving development consent, the Applicant will set out its detailed construction programme within the Construction Environmental Management Plan that will be subject to sign off by the local authorities. This programme will be prepared to ensure that the development peak on each site does not occur at the same time.</p>	
SCC-100	Transport and access	Assessment	<p>Paragraph 13.4.10 of the ES sets out the Applicant's assessment of car share, which is based on the assessment methodology used for Sizewell C, which was in turn based on evidence collected from Hinkley Point C. SCC does not agree with this application for the following reasons:</p>	Please see SCC-97.	No response required.

			<ul style="list-style-type: none"> • Sizewell C and Hinkley Point are much larger development with a larger workforce potentially making car sharing more likely. • The transitory nature of the workforce i.e. staying in shared accommodation whilst working on the Sizewell C project may make them more likely to car share. • REP2-046 of the Sizewell C Transport Assessment (EN010012-004849-D2 - Sizewell C Project - Other- Consolidated Transport Assessment Appendices Part 1 of 6.pdf (planninginspectorate.gov.uk)) sets out the methodology used and Table 4 of Appendix 7B provides the surveyed car share figures from Hinkley Point, importantly the car share factors being experienced at that time were approximately 1.3 		
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			<p>workers per car. The use of 1.54 workers per car was for non-home based workers only, with home based workers remaining at 1.1 workers per car. Therefore, a generic application of 1.5 is not representative of the data.</p> <p>Further information is needed on the workforce to determine which of the figures above would be most appropriate for the development's workforce</p>		
SCC-101	Transport and access	Policy	<p>SCC does not consider the Applicant has fully applied the appropriate national guidance in preparation of the Transport Assessment, specifically in terms of traffic modelling.</p>	<p>Transport submissions need to provide an appropriate level of assessment of their travel impacts, the scale and form of which will vary significantly by context. It is unclear which national guidance has not been fully applied as requirements for traffic modelling are not specified in national guidance.</p> <p>The Transport Assessment [APP-117] and Chapter 13: Transport and Access of the Environmental Statement [APP-045] provide and justify the methodology for assessment of the impact on driver delay through the absolute and percentage change in traffic flows, as well as comparison with peak period data to</p>	<p>The Council looks forward to picking up this point in discussions.</p>

				provide useful context and a reference point to with regards the capacity performance of the network. This is entirely appropriate and standard practice for an Environmental Statement, particularly considering the changes in traffic flows occur for a short-term, temporary time period during construction, outside of traffic network peaks. Further explanation on this approach has been provided to the LHAs (26 April 2022).	
SCC-102	Transport and access	Policy	Paragraph 5.13.1 of the NPS EN-1 and quoted by the Applicant states that if the project is likely to have significant implications a transport assessment should be undertaken using WebTAG methodology. The Applicant refers to their ref 4 stating they have used Ministry of Housing, Communities and Local Government (March 2014) Travel Plans, Transport Assessments and Statements, ID 42. The MCHCLG document explains why transport assessments and travel plans are required and at a high level what they should contain. The document does not reference the methodology to be used nor provide detailed comments on assessment methods. The submitted TA does not in SCC's opinion contain all that is	<p>The Applicant respectfully disagrees with the statement that the assessment does not provide a '<i>thorough assessment of the transport implications of development</i>'. The transport documents include Chapter 13: Transport and Access of the Environmental Statement [APP-045], the Transport Assessment [APP-117], the Framework Construction Traffic Management Plan and Travel Plan [APP-118], the Traffic Regulation Measures Plans – Road Closures [APP- 009 to APP-011] and the Temporary Traffic Management Plans – Temporary Measures [APP-012-013] which is considered to provide a thorough and appropriate assessment of the Scheme.</p> <p>The Applicant respectfully disagrees with the statement 'the application fails to encourage sustainable travel, lessen its <i>traffic generation and as such its detrimental impacts nor improve road safety</i>'. The</p>	The Council looks forward to picking up this point in discussions.

			<p>required for a 'thorough assessment of the transport implications of development' as required by the guidance. The application fails to encourage sustainable travel, lessen its traffic generation and as such its detrimental impacts nor improve road safety as would be expected from a Transport Assessment. The assessment does not undertake a full assessment of road network capacity, as would be expected, but rather relies on work undertaken as part of the Forest Heath Local Plan process, which although relevant does not negate the need for specific junction modelling. The guidance indicates that the timeframes that the transport assessment covers should be agreed with the local planning authority in consultation with the relevant transport network operators and service provided.</p>	<p>Transport Assessment [APP- 117] and the Framework Construction Traffic Management Plan and Travel Plan [APP-118] identify measures to encourage sustainable travel such as increasing car passenger mode share and through the provision of a mini- bus(s) service to pick-up/drop-off construction staff. It is identified in Transport Assessment [APP-117] that the bus and rail timetables do not match the arrival and departure times of the construction staff, which provides justification to encouraging car sharing and the provision of the mini- bus(s) service. Commitment is made in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] to further develop the sustainable travel measures in the Travel Plan as the Scheme progresses and more is known about the future workforce. In addition, the proposed mitigation is shown on the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] and Traffic Regulation Measures Plans - Temporary Measures [APP-012 - APP-013] that proposes to include temporary speed limit reductions and temporary traffic signals to provide safe entry and egress in/out of the site accesses.</p> <p>SCC-101 above refers to the suitability of the assessment of impact on driver delay. As outlined in the Environmental Statement it is not considered necessary to</p>	
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				<p>undertake junction capacity modelling as the Forest Heath Local Plan identifies the Red Lodge Dumbbell roundabout and Dane Hill roundabout to operate between 0.46 and 0.50 RFC in 2031 with similar traffic flows as identified in the peak construction month of the Scheme, thus enabling clear conclusions to be drawn.</p> <p>The timeframe included within the Transport Assessment [APP-117] represents the peak construction months for Sunnica East Site A & B, Sunnica West Site A & B and the Scheme overall. It is agreed that an assessment of the operational phase is not required, and the construction phase is time limited. The Applicant therefore considered it reasonable to undertake an assessment of the timeframe of the construction phase taking into account that operational effects were scoped out of the assessment, in accordance with the Scoping Opinion [APP-052].</p>	
SCC-103	Transport and access	Policy	<p>SCC disputes that the transport assessment has been submitted with acceptable levels of consultation with the local highway authority notably that comments made during consultation have not been reflected in the application. The Applicant has not demonstrated whether or how it has considered</p>	<p>References to the level of consultation are discussed in SCC-76 and SCC-78. Annex A of Chapter 13: Transport and Access of the Environmental Statement [APP-045] contains a policy review. A combined Framework CTMP and TP document [APP-118] has been submitted outlining the measures proposed to mitigate the transport impacts. A requirement of the DCO will ensure that these measures will be</p>	<p>This comment is noted.</p>

			<p>local policy and guidance such as:</p> <ul style="list-style-type: none"> • Local Transport Plan: • SCC travel plan guidance: • Green Access Plan Green Access Strategy (Rights Of Way Improvement Plan) • Highways Operational Plan • Highways Asset Management Plan • Speed Guidance • National Bus Strategy in Suffolk 	<p>developed in detail and complied with. When the final Travel Plan is produced it will be in line with the most up to date version of the Suffolk Travel Plan Guidance, noting that the current version is dated December 2021, after the DCO application was submitted.</p> <p>The consideration of PRowS is included within Chapter 13: Transport and Access of the Environmental Statement [APP-045] which outlines the PRowS which are expected to be temporarily closed for no longer than three weeks.</p> <p>Also, as part of the scheme a number of new Permissive Routes are identified to be present during the operational phase of the Scheme. Due to the highly limited and temporary nature of scheme impact on PRow, and mitigation not being required to the PRow network, it is not considered necessary to include a review of the Green Access Plan Green Access Strategy (Rights of Way Improvement Plan).</p> <p>The Highways Infrastructure Asset Management Plan and Highways Operational Management Plan relate primarily to maintenance of highways assets. The Framework CTMP [APP-118] includes commitment to before, during and after condition surveys to ensure that the</p>	
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				<p>development identifies and addresses potential deterioration of the highways as a result of construction activities. Proposals for works to the public highway, for which such documents may hold relevance, are at preliminary stage, and therefore these documents can be considered at later, appropriate, stages of design.</p> <p>With regards to the Speed Guidance, it is assumed that this refers to Suffolk CC's Speed Limit Policy (2014). The scheme proposals include introducing temporary speed limits at access points in rural locations. This situation is not included within the Policy. The Policy established that existing speeds should be a factor in setting of speed limits. Traffic speed surveys have been undertaken to evidence the appropriateness of the temporary speed limits proposed within the Traffic Regulation Measures Plans - Temporary Measures [APP-012 to APP-013].</p> <p>It is not considered relevant to outline the National Bus Strategy in Suffolk given the arrival and departure of the construction staff and the services available at those times. Furthermore, whilst the Local Transport Plan is an important document, Chapter 13: Transport and Access of the Environmental Statement [APP-045]</p>	
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				demonstrates that the construction phase of the development will be acceptable without reliance on strategic transport improvements. As a temporary scheme, with limited effects on the highways network, the development will also not preclude the delivery of schemes within the Local Transport Plan.	
SCC-104	Operations	Maintenance	Scoping out of the Operational Phase would be acceptable provided that it can be confirmed by the Applicant that there is no likelihood of significant maintenance, such as wholesale replacement of solar panels or batteries, during this phase. SCC notes the definition of 'maintain' in Article 2(1) of the draft DCO [APP- 019] allows for partial replacement and the limitation in Article 5(3) on maintenance works which have new or different environmental effects to those assessed, and will be seeking clarification and confirmation as to what is intended, given that baseline conditions for the receiving environment (especially as regards traffic) can be expected to be very different in 20 or 30 years' time.	<p>Section 3.7 of Chapter 3, Scheme Description of the Environmental Statement [APP-035] sets out the assumptions that have been made as to the extent of operational and maintenance activity, which is reflected in the DCO definition.</p> <p>This includes the inspection, removal, reconstruction, refurbishment or replacement of faulty or broken equipment to ensure the continued effective operation of the Scheme and improve its efficiency. This would include panels or batteries where necessary. However, it is not expected that there will be significant maintenance required, and the DCO does not allow wholesale replacement of the authorised development that would give rise to new or materially different environmental effects than those that have been assessed in maintenance in the Environmental Statement.</p> <p>Environmental management during the</p>	This comment is noted. The Council observes that the point on the definition of 'maintain' is being addressed by submissions to ISH1.

				<p>operational phase would be covered by the Operational Environmental Management Plan approved under Requirement 15 of the Draft Development Consent Order [APP-019].</p> <p>Article 5(3) refers to such works not leading to any materially new or materially different effects that have not been assessed in the environmental statement. That is therefore the baseline position against which the maintenance activities would be carried out.</p>	
SCC-105	Operations	Working hours	<p>The Applicant relies on strict shift patterns to avoid impact on the highway network in peak hours. SCC requires further evidence that this can indeed be delivered and that acceptable controls are in place to ensure that trips do not exceed those assumed and greater impacts occur on the highway network than assessed.</p>	<p>These controls will be brought forwarded and evidenced as part of bringing forward the CTMP for SCC's approval pursuant to requirement 16 of the DCO.</p>	This comment is noted.
SCC-106	Operations	Parking	<p>Further details are required to show that the parking permit scheme will be effective, for example there are no controls on workers parking in nearby communities and being picked up by colleagues for the last mile, resulting in potential fly parking. Details such as how traffic will be managed when entering the car</p>	<p>For construction staff workers who are local residents to the Scheme, a mini-bus service will be investigated to pick- up/drop off construction staff workers to reduce the number of staff vehicles. Details of this can only be confirmed once the construction staff home locations are known and would be for the contractor to manage and implement, if/when this service is required. This is identified in paragraph 7.2.30 in the</p>	This comment is noted.

			<p>parks is lacking.</p>	<p>Framework Construction Traffic Management Plan and Travel Plan [APP-118].</p> <p>The two car park locations have been chosen close to the Strategic Road Network (A11) to encourage staff to use the A11 and A14 for as much of their journey to/from the site as possible to avoid passing through local residential areas:</p> <ul style="list-style-type: none"> • Sunnica West Site A – to be accessed off La Hogue Road which links to the A11 approximately 400m / 0.25 miles to the south of the site access; and • Sunnica East Site B – to be accessed off Elms Road, which is located circa 1km / 0.6 miles to the A11 northbound off-slip/Elms Road T-Junction and is also located in close proximity 1.6km / 1 mile to the Red Lodge Dumbbell Roundabout <p>The size of the two construction staff car parks has been identified to accommodate the peak number of construction vehicles forecast. As the construction of the Scheme progresses the two car parks will be required to be reduced in size. It is not considered that staff will need to ‘fly-park’</p>	
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				<p>if the car parks are large enough to accommodate the required vehicles. The usage of car parks will be monitored through the construction phase. A Stakeholder Community Liaison Officer will be in post through the construction phase, with part of the role being to listen to concerns from local communities. If “fly parking” does occur, they would work with the LHA to identify whether it is creating a safety or amenity issue in a local community, and if so, to request staff not to do so, and work through the Travel Plan process to enact ways to reduce the occurrence.</p>	
SCC-107	Transport and access	HGV movements	<p>SCC is not satisfied with assumptions made such as a constant profile of movement throughout the day. This is contrary to information provided for other projects.</p>	<p>The Applicant respectfully disagrees. It is robustly assumed there will be a 10-hour construction delivery window based on the 12-hour construction worker shift as this excludes the two network peak hours. Movements are split equally across the 10-hours, which is a greater level of trips per hour than a constant profile, given the 12-hour working time. Furthermore, the calculated hourly level of HGVs is based on the peak of the construction period.</p> <p>This is a reasonable and robust approach based on the assessor’s experience producing EIA applications and reviewing them in a development management function on behalf of LHAs.</p>	<p>The Council looks forward to picking up this point in discussions.</p>

SCC-108	Transport and access	HGV movements	The data used to calculate the number of HGVs for construction is being reviewed, but initial concerns are that key issues such as the movements to supply and remove aggregate for haul roads and peaks associated with concrete pours have been considered.	An experienced contractor provided information on the HGV forecasts, and this included the concrete deliveries required for the haul roads and concrete as part of the civil works required.	This comment is noted.
SCC-109	Transport and access	Assessment	There are limitations to the traffic data provided. SCC appreciates that current circumstances make collecting additional data difficult and that historic traffic patterns may alter as a result of the pandemic. On this basis SCC has attempted to review and respond pragmatically; however, there remain locations where data is not provided, and this is particularly important when considering the absence of data on NMUs, and the assessment of impacts on this basis.	This is noted and has been discussed with the LHAs post application. Our position remains that the conclusions drawn on the data available are sufficiently robust to be valid. However, to provide further confidence, additional traffic and NMU surveys have been undertaken and will be reported on when the data is available. This approach has been agreed with the LHAs, and opportunity to comment on the scope of surveys was provided.	The Council notes this comment and looks forward to receiving further survey information.
SCC-110	Transport and access	Safety	SCC has not fully reviewed the crash data presented but remains concerned regarding the frequency of crashes at A14/A142 Junction and the impact of the construction on the safety of minor roads adjacent to Sunnica East particularly vulnerable groups.	Discussions are on-going with the LHA regarding the A14/A142 junction and potential measures to improve safety at the junction during the construction period. The Temporary Regulation Measures Plans – Road Closures [APP-009 to APP-011] and Temporary Regulation Measures Plans – Temporary Measures [APP-012 to APP-013] set out the proposed temporary speed	Discussions are underway.

				limit reductions and traffic signals at the construction site accesses. These measures will benefit NMUs along the highway.	
SCC-111	Land use	Public rights of way	Requirement 21 of the dDCO (APP-019) ensures that the permissive paths must be retained until decommissioning. However, this will not form a permanent right of way given to the benefit to rights of way users, nor will the permissive paths have the same amenity value as existing rights of Way. Thus, SCC considers limited weight should be given to these proposals by the inspector. No 'permitted path details' are provided so it is unclear who will be responsible for their maintenance.	<p>SCC is correct in its understanding that the permissive paths would not constitute highways and would not be permanent. The weight to be afforded the permissive paths is a matter for the decision maker, but the Applicant considers that the provision of such paths for the duration of the Scheme will constitute a benefit for those users.</p> <p>Requirement 21(1)(c) of the draft DCO [APP-019] provides that the details of the permissive paths would need to include the maintenance regime for each path, which, by definition, would include clarity on who would undertake such maintenance.</p>	This comment is noted.
SCC-112	Land use	Public rights of way	No evidence has been provided to substantiate the claim (6.15) that the PRow are recreational routes nor surveys undertaken to show that the 'expectation' that pedestrian flows are low is correct.	It is not considered appropriate to undertake surveys of PRow given the length of time the PRow are forecast to be closed which is expected to be a maximum of three weeks which is considered to be a worst-case scenario. It is the Applicant's view given the characteristics of the PRow in relation to location, lack of desire lines for commuting, distances between significant origin and destinations, lack of paving and lighting etc, that it is reasonable to conclude that the PRow are predominantly recreational routes.	This comment is noted.

SCC-113	Transport and access	Assessment	<p>SCC considers that there are shortfalls in the Transport Assessment such as:</p> <ul style="list-style-type: none"> Fundamental issues around the assessment of the development's impact based on 12-hour day shift patterns The assessment of driver delay does not quantify impacts in terms of delay (e.g. increasing in journey time). The impacts are entirely based on changes in traffic flow, and whilst this may provide some indication about the potential change in delay it does not define the changes in delay meaningfully. The use of phrases such as 'it is expected' or 'it is considered that' should not been accepted as evidence. Concerns remain regarding the accuracy of the ratio used to determine baseline flows in the development peak hours. The data used to calculate these 	<p>The construction working hours will be secured pursuant to approval of the CEMP, therefore the assessment is considered reasonable to base the arrival hour of staff between 0600-0700 and departure hour of staff between 1900-2000.</p> <p>The assessment of driver delay is considered appropriate and reasonable as discussed in SCC-101 and SCC-102. Phrases such as "it is expected" or "it is considered that" are used to draw conclusions based on the evidence presented, which is justified in Chapter 13: Transport and Access of the Environmental Statement [APP-045] and the Transport Assessment [APP-117].</p> <p>The spreadsheet used to calculate the ratio to determine the development peak hour traffic flow from the available traffic data can be provided to the LHA for review.</p> <p>The level of construction workers and HGVs required on- site during the Saturday working hours are typically significantly lower than those identified for a weekday due to more limited construction activities on these days. The amount is currently not quantified however the Applicant will investigate whether the LHA can be provided with further information in this regard.</p> <p>The mini-bus trips will occur outside of the</p>	<p>The Council looks forward to picking up these points in discussions.</p>
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			<p>reductions should be submitted for review particularly as Table 3-13 indicates a range of differences between these hours particularly for the AM which appears to be between 0.6 and 0.8 rather than the 0.4 which has been used, albeit it is recognised that these figures are for a more strategic part of the network and so may be lower for more rural locations.</p> <ul style="list-style-type: none"> • Dismissing traffic impact of construction traffic on Saturday is not accepted without evidence. The ending of a shift at 1300 may coincide with the peak on Saturday. • Removing the minibus movements (59 single direction trips i.e. 118 movements) should not be dismissed from the modelling particularly on Elms Road. <p>Impacts are often dismissed based on their comparison to the</p>	<p>construction and network peak hours. The mini-bus trips are forecast to occur after the workers have arrived on and before the network peak hour in the AM. In the PM the mini-bus trips are in relation to transporting staff across the site back to the two staff car parks. Therefore, it is not considered necessary to forecast the percentage impact during the hours the mini-bus trips are expected to occur given the low number of trips across the local highway network to a number of different site accesses. The timing of the mini-bus trips has been discussed and outlined in the meeting with the LHA (April 2022).</p> <p>The Applicant respectfully disagrees with the final bullet point regarding the validity of comparison with the peak hour. The reason for the comparison of the development peak hours baseline and development traffic against the highway peak hours is to demonstrate that significant delay or congestion is not forecast as a result of the scheme. It is considered a reasonable approach to demonstrate that the Scheme would not have a significant impact on the highway network if the traffic flows were lower than the peak hours where delay and congestion would be at its greatest.</p>	
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			peak hour (such as paragraph 13.8.227), this is not considered a valid reason for dismissing impacts given the assessment is to test the development's impact, not whether the network operates better during certain other periods.		
SCC-114	Transport and access	Mitigation	The mitigation relies on Staff routing (4.5.6), vehicle occupancy, working hours (4.5.7), on site car parking strategy (4.5.8) management of parking access (4.5.9), proposed parking permits (4.5.11) minibus for internal movements <u>where possible</u> (4.5.12) and <u>investigations</u> into minibus pick up from local residential areas (4.5.14). Many of these measures are not firm commitments enshrined in the dDCO or supporting documents and can therefore be given little weight as mitigation, for example in 6.3.19.	The Applicant respectfully disagrees, References to passages in the F-CTMP and TP [APP-118] are included in brackets to signpost the reader to the relevant sections, and there are multiple further mitigation measures set out within the F-CTMP and TP [APP-118] , with management measures included in Section 7. The car parking strategy (7.2.27 to 7.2.29) has been developed to minimise the number and requirement for construction staff vehicles to travel on local roads with the two car parks located near to the A11. The construction working hours (7.2.26) will be secured pursuant to approval of the CEMP, provided in outline as Appendix 16C of the ES [APP-123] . The car parking strategy (7.2.27), management of parking access (7.2.28), proposed parking permits (7.2.29) and using mini- buses for internal movements (7.2.30) are all firm commitments within the Framework Construction Traffic Management Plan and Travel Plan [APP-118] . However, it is agreed at this stage that the exact routing and frequency of the mini-bus(s) to local	This comment is noted.

				<p>residential areas (7.2.31) cannot be confirmed as the home locations of the construction staff are unknown and therefore it is not possible to identify the exact routes and frequencies.</p> <p>It is noted that the construction vehicle occupancy parameter has been questioned by the LHAs. In response to this, the Applicant has reviewed the parameters assessed across a wide range of DCO projects, with an additional focus on wind and solar as the closest comparable projects. This review shows that 1.5 is a robust vehicle occupancy parameter. Further to this, the Applicant has undertaken a sensitivity analysis using a parameter of 1.3 vehicle occupants, as the lowest vehicle occupancy in the review was 1.33. If this parameter were to be applied, there would be no new impacts that would be classed as significant in EIA terms. This information has been presented to the LHAs, and is not understood to be in dispute at the time of writing. All the proposed mitigation outlined are considered appropriate for the Scheme and the level of commitment is appropriate given the stage of the proposals.</p> <p>Compliance with the measures contained in the F-CTMP and TP [APP-123] are secured through requirement 16 of the draft development consent order, which requires the approval of the relevant county authority of the full Construction</p>	
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				Traffic Management Plan before the commencement of the authorised development.	
SCC-115	Transport and access	Monitoring, control and enforcement	SCCs consider that they are best placed to be the authorisation body for construction traffic management and travel plans as these relate to public highways under their control and have teams with the relevant technical knowledge.	The valuable contribution that the SCC and other highway authorities can provide in relation to the Construction Traffic Management Plan is recognised in Requirement 16 of the draft DCO [APP-019] , which provides for those bodies to determine whether to approve the detailed Construction Traffic Management Plan.	This comment is noted.
SCC-116	Transport and access	Monitoring, control and enforcement	<p>SCC considers that the monitoring and controls proposed within the Framework Construction Traffic Management Plan are not acceptable in the current form. Specific issues are:</p> <ul style="list-style-type: none"> • Vagueness of some measures, for example: Measures could include implementing a three-strike system for contractors which could lead to financial penalties (7.2.4) HGV deliveries can be arranged to avoid the need for vehicles to depart the Site within the PM avoid the network peak hour (17:00-18:00) (7.2.6). • The management plan does not include 	The Construction Traffic Management Plan and Travel Plan [APP-118] is a Framework which is appropriate for the stage of the proposals and in particular section 7 regarding management. Therefore, the contractor is expected to finalise the measures within the final CTMP document which must be substantially in accordance with the Framework CTMP [APP-118] , and which will be submitted for approved by the relevant local highway authorities, pursuant to requirement 16 of the draft DCO [APP-019] .	The Council respectfully maintains its position and notes that it has similar expectations for other infrastructure projects at this point in the planning process. This could usefully be revisited in discussions with the Applicant.

			<p>monitoring of car occupancy to ensure that the proposed 1.5 occupancy is achieved.</p> <ul style="list-style-type: none"> • The Applicant has not explained how compliance with staff arriving before 0700 and leaving after 1900 will be monitored and enforced other than a car parking permit system is proposed to be implemented across the two car parking areas (7.2.29). • It is unclear how regular reports will be issued and to whom (7.4.2 and 8.2.2). It is also unclear how issues will be identified and resolved and how this will be communicated to interested parties other than 'monitoring reports will be made available the relevant local planning authorities and relevant highway authorities at their request to ensure compliance and that action is being taken 		
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			<p>where breaches are occurring' (8.2.5). SCC considers that such information should be regularly reported to local planning and highway authorities and made public.</p> <p>The Applicant does not consider how complaints will be collected, assessed and where necessary action taken to resolve any issues that arise.</p>		
SCC-117	Transport and access	Access	<p>The plans provided to support the access reviews are insufficient to enable a meaning full assessment of their safety and deliverability within the order limits. Specific issues are:</p> <ul style="list-style-type: none"> • They are based on poor quality plans which do not appear to have been validated by on site surveys. • The plans are not to scale and barely legible. • The highway boundary has not been shown to confirm the works can be delivered within the order limits / highway boundary including 	<p>The Temporary Regulation Measures Plans – Temporary Measures [APP-012-013] and the Traffic Regulation Measures Plans – Road Closures [APP-009 to APP-011] identify the proposed temporary speed limit reductions, proposed temporary traffic signals and temporary road closures which all form part of the mitigation to provide safe entry and egress to the construction site accesses. The mitigation proposed has been undertaken on a mixture of available topographical survey mapping and OS mapping.</p> <p>The proposed temporary speed limit reductions and temporary traffic signals are proposed to limit the amount of vegetation removal/trimming required to create the site accesses and also to provided safe</p>	<p>The Council respectfully maintains its position. The Council looks forward to picking up this point in discussions.</p>

			<p>oversailing of land adjacent to the highway by large vehicles.</p> <ul style="list-style-type: none"> • Visibility splays either side of the accesses are poorly shown, if at all, and impossible to validate. • The presence of hedges, trees, ditches and utility apparatus that may affect the design are not shown. See table 13 for B1102 Freckenham Road (south) where it is noted that the visibility splays are 2.4m x 215m and that mature trees and hedgerows are present on either side of the road. 	<p>entry and egress to the construction site accesses without large amounts of vegetation trimming/removal as construction site access are only required for a short period of time.</p> <p>The information provided in the Annex of the Framework Construction Traffic Management Plan and Travel Plan [APP-118] is supplementary information that was used in the initial site access review and outlines the visibility splay requirements based on 60mph (100kph) speed limit and uses Google Earth aerial imagery to provide clarity in rural locations with few discernible landmarks. The intention of the plans is to provide supplementary information to the proposed mitigation. The information provided for the site accesses in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] has been undertaken on a mixture of available topographical survey mapping and OS mapping.</p> <p>Discussions are ongoing with the local highway authorities regarding producing a suite of consolidated plans setting out the presentation of the information for each of the site accesses. This includes addressing the specific points referred to. The level of information provided within the</p>	
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				<p>application documents referred to above is suitable for the purpose of demonstrating the feasibility of their proposed use. Subsequent detailed design of the accesses would require the approval of the relevant local planning authority, pursuant to requirement 6 (detailed design) and compliance with the provisions of the draft DCO [APP-019] outlined in response CCC-57.</p>	
SCC-118	Transport and access	Access	<p>The quality of the information can be contrasted with the provided for the EA1(N) application in the Outline Access Management Plan for a similar scale of development. SCC would consider the lack of this information so important as to object to granting of an order until such time as sufficient information can be provided to evaluate the proposals.</p>	<p>The application includes a site access review which included identifying the visibility splay requirements based on the speed limit of the highway. The initial review identified a large amount of vegetation to be trimmed/removed, which would have been inappropriate for short-term temporary accesses due to other environmental impacts. As a result, therefore a strategy for access was created which included Temporary Speed Limit Reductions and Temporary Traffic Signals, which has been included in the submitted application. Subsequently, swept path analysis and indicative junction layouts consistent with an approach that seeks to minimise the potential adverse effects of extensive vegetation removal, are also provided in the Framework Construction Traffic Management Plan and Travel Plan [APP-118]. An AIL/Crane route review was also undertaken which identifies where street furniture or signage is required to be temporarily relocated to accommodate the</p>	<p>The Council respectfully maintains its position. This issue could be usefully addressed in further discussions.</p>

				largest crane. Speed surveys were also undertaken at the request of the LHA and included in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] along with the Stage 1 Road Safety Audit which was also requested by the LHA. Information regarding the management of the site accesses and the two staff car parks are also outlined in the Framework Construction Traffic Management Plan and Travel Plan [APP-118] .	
SCC-119	Transport and access	Highways works	<p>SCC was not consulted on these plans prior to submission. Neither the proposed widened road width nor detail design, specifically edge restraint for the road construction, have been agreed with SCC. While Manual for Streets (MfS) does indicate a width of 4.8m allows an HGV to pass a car it also indicates 5.5m is necessary for HGVs to pass each other. MfS is primarily guidance for residential low speed streets rather than rural roads. In rural situations SCC would consider use of Design Manual for Roads and Bridges (DMRB) to be a more appropriate starting point for design. Such dimensions do not allow for additional space at bends or junctions nor do these dimensions allow for overhang</p>	<p>During a consultation meeting (26 April 2022) with the LHA it was confirmed that the primary concerns were two HGVs meeting each other, and impact on highways condition of use of the edge of the carriageway and verge. The Applicant confirmed that the Framework Construction Traffic Management Plan and Travel Plan [APP-118] includes the provision for before, during and after condition surveys of the highway. It is understood that this addresses the second point. The road widths vary, so there are a number of locations currently where two HGVs can pass, as well as locations where widths need increasing. The safety of passage of two HGVs depends on the width of the road, curvature and forward visibility. As a result of the concern previously raised during consultation a review of Elms Road and La Hogue Road was undertaken to identify where the</p>	The Council looks forward to reviewing further information.

			<p>(e.g. mirrors). A width of 4.8m will result in loading of the carriageway edge leading to failure and vehicles are likely to overrun the verge resulting in erosion or rutting of the verge.</p>	<p>highway was less than 4.8m wide as this width is identified from Manual for Streets as being able to accommodate an HGV passing a car. However, it is accepted that the LHA seeks to ensure an HGV can pass an HGV which is identified in DMRB as requiring a road width of 5.5m, and may need to be wider in some locations depending on swept path analysis of vehicles. The Applicant's position is that a consistent width suitable for two HGVs to pass is not required, and the Applicant does not understand this to be in dispute, but that sufficient locations for passing with good intervisibility will need to be available. Revised plans demonstrating how this can be achieved within the Order limits are being prepared and will be submitted to the LHAs for review and discussion when available.</p>	
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