

Sunnica Energy Farm EN010106

Response by Suffolk County Council to Appendix A of [REP3-019] Applicant's Response to the Joint Local Impact Report Deadline 4

16 December 2022

Summary

Appendix A of [REP3-019] '*Applicant's Response to the Joint Local Impact Report*' forms a Technical Note responding to comments made on link sensitivity within the Transport and Access Chapter of the Environmental Statement. The technical note focuses on the Councils' comments on link sensitivity within our Local Impact Report [REP1-024], and the Applicant's position.

In response to paragraph 3.1.2 of the appendix, for posterity, the Council does not fully agree with the overall methodology; however, in order to be helpful and move the assessment forward, the Council has tried to specify our issues at a very local level i.e. specific to each link and whether our concerns are material to the overall conclusions of the assessment or not.

With regards to paragraph 3.1.3 of the appendix, it is considered that the level of operation of the on-slips has not been evidenced within the report, nor is it considered the method for classification a reasonable approach; however, it is recognised that assuming relevant controls, reporting and enforcement is agreed that the impacts at this location on highway capacity are unlikely to be significant as they are 'off-peak'. We have made separate comments on the CTMP&TP in our Deadline 4 response, which require addressing for this to be determined.

It would have been helpful had Table 3.1 contained the proportional and numerical changes that inform the magnitude of effects, so that any locations where a change that is near to a threshold could be readily identified. This is particularly important given some confusion of the reported numbers within the Environmental Statement [APP-045], as per our comments within our LIR [REP1-024]

In section 4 of the Appendix, the Applicant undertakes a review of the development impacts based on the recommended sensitivities from Suffolk County Council. The Council recognises that the Applicant is not agreeing to these sensitivities; however, we appreciate the effort made in trying to

address some of our concerns. It is however worth bearing in mind that the impacts are a result of a number of elements that are not currently agreed by the Council:

- Workforce origins.
- The very specific short term impacts of large numbers of workforce vehicles arriving in 15 minute periods.
- Shift patterns and vehicle numbers; however, the Council welcomes recent commitments from the Applicant on this issue, which, begin to address some concerns, but are subject to agreement of the processes in the CTMP&TP, as above.
- The absence of a daily assessment of the change in HGV movements.

In order to be helpful to the ExA, the Council provides comments below to the specific locations identified within the technical note based on the Applicant's assessment method which are therefore subject to the assessed travel patterns.

Red Lodge Dumbbell Roundabout North

Elms Road – given the very low surveyed figures of vulnerable road users, the Council does not disagree with the Applicant's conclusions.

A11 NB On-Slip Red Lodge – The Council does not agree with the Applicant's conclusion on link sensitivity. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off peak and therefore unlikely to have a material impact on the operation of the highway network.

Newmarket Road South – The Council welcomes the Applicant's attempt to address our concerns; however, disagrees that Elms Road can be used in isolation to estimate the level of NMU movements at this location; at best it may provide an indication, but movement between Red Lodge and Worlington, and subsequently Mildenhall would not form part of the figures provided. As a result, the Council does not currently agree with this conclusion.

Red Lodge Dumbbell Roundabout South

Newmarket Road North – The conclusion is the same as for Newmarket Road South above.

A11 SB Off-Slip Red lodge – The Council disagrees with the reasoning here that the off-slip's sensitivity is not high as it connects to the local road network. Any disruption to the operation of the off-slip could potentially have significant consequences on the operation of the strategic road network. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off peak and therefore unlikely to have a material impact on the operation of the highway network, albeit remain concerned about very peaky arrival and departure patterns.

Warren Road – No direct response is made regarding Warren Road, the Council remains concerned around the impacts through the town. Clarification is sought as it appears that classification of this link as high sensitivity would result in a change in the magnitude of effect on this corridor.

B1085 Turnpike Road – No new evidence or reasoning has been provided here, and so the Council maintains its position.

A11 SB On-Slip – The Council does not disagree with the conclusions. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off peak and therefore unlikely to have a material impact on the operation of the highway network, albeit remain concerned about very peaky arrival and departure patterns.

B1056 Bury Road / Herringswell Road / Gazeley Road

B1506 Bury Road (East) – It is believed that the Applicant is misrepresenting the Council's position here as we are well aware that sensitivity is not a product of impact. The Council is concerned about the increase in right turning vehicles, but these have not determined our suggested sensitivity. The Applicant has indicated that junction modelling has been undertaken and provided the results. However, in order to confirm that the Council accepts any assessment, we would need the origin of the turning movements, the full model outputs and a drawing of the junction including geometries to determine the acceptability of the model. That being said, the Council would agree with the conclusions drawn from those results, albeit based on the caveat around the assessment hour being subject to the assessed shift patterns, which needs to be repeated.

Gazeley Road – No new evidence or reasoning has been provided here, and so the Council maintains our position regarding the sensitivity of the location for NMUs. However, it is recognised that the change in traffic flows appears to be very low, albeit there is some confusion between Chapter 13 of the Environmental Statement [APP-045] and the new technical note, and so the Council considers that there is unlikely to be a material impact.

B1506 Bury Road (West) – The Applicant has indicated that junction modelling has been undertaken and provided the results. However, in order to confirm that the Council accepts any assessment, we would need the origin of the turning movements, the full model outputs and a drawing of the junction including geometries to determine the acceptability of the model. That being said, the Council would agree with the conclusions drawn from those results, albeit based on the caveat around the assessment hour being subject to the assessed shift patterns, which needs to be repeated.

With regards to the assessment of impacts on NMUs, no new evidence or reasoning has been provided here, and so the Council maintains its position, but recognises that this will not materially impact conclusions at this location.

Herringswell Road – No new evidence or reasoning has been provided here, and so the Council maintains its position. As above, it would have been beneficial to have the numerical change in traffic flows included for comparison. This is particularly important given the concerns we raised within Annex F of our Local Impact Report [REP1-024] regarding the traffic flows being reported at certain locations including Herringswell Road and Gazeley Road, as it makes undertaking reasonable comments more difficult.

A14 Junction 37

A142 Fordham Road North – No new evidence or reasoning has been provided here, and so the Council maintains its position, but recognises that this will not materially impact conclusions at this location.

A14 WB Off-Slip East – The Council does not agree with the conclusion on link sensitivity. However, we also recognise that assuming travel patterns reflect those assessed, the impacts are off-peak and therefore unlikely to have a material impact on the operation of the highway network.

Conclusion

In summary, there remain matters within the assessment that SCC do not agree with, but the Council considers that these are not of such significance that they would materially change the assessed impacts and further discussion of the details is unlikely to be of benefit to the examination.

Therefore, if measures are agreed by the Applicant such as the application of robust controls, monitoring, reporting and enforcement to secure the assumed construction movements and prevent journeys outside the assessed development peaks, SCC would be able to indicate to the ExA that, this matter is concluded as far as the Council is concerned.