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22 October 2024

Via E-Mail to:

fiveestuaries@planninginspectorate.gov.uk

Dear Mr Gould,

FIVE ESTUARIES OFFSHORE WIND FARM – EN010115

REPONSE TO THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION (ExQ1)

Please find attached in Appendix A the responses to the two Written Questions raised by the Examining Authority on 8 October 2024 pertaining to terrestrial transport, and specifically National Highways, TT1.03 and TT1.04.

Yours sincerely,

[redacted]

Kelly Milburn
Spatial Planning Manager

APPENDIX A

Project: **Five Estuaries Offshore Wind Farm (ref: EN010115)**

Subject: **Response to The Examining Authority's Written Questions and Requests for Information, dated 8 October 2024 (ExQ1)**

Date: **22 October 2024**

1. Introduction

1.1 Two Written Questions raised by the Examining Authority for the Five Estuaries Offshore Wind Farm DCO application were specifically addressed to National Highways.

1.2 National Highways' responses to these questions are set out below in sections 2 and 3 of this note.

2. Adequacy of the Assessment of Traffic and Transport Impacts on the SRN (TT.1.03)

2.1 Question TT.1.03 is as follows:

"**Assessment of onshore traffic and transport impacts (TT.1.03)**

Do you consider that the assessment of onshore traffic and transport impacts for the Proposed Development, as set out in Chapter 8 of the Environmental Statement (ES) [APP-090] and the Traffic and Transport Baseline Report [APP-172 and APP-173] addresses all relevant issues? If not, what are your concerns and how might they be addressed?"

2.2 Background

2.2.1 National Highways' technical consultants, AECOM, reviewed the Five Estuaries application documentation and provided advice in respect of the traffic modelling documented in the Transport Assessment. Ten critical concerns and a series of other matters were raised and were shared with the Applicant on 2 September 2024.The Applicant provided a written response on 29 September and a meeting was held between the Applicant and National Highways, and their respective technical consultants (SLR and AECOM), on 2 October 2024.

2.2.2 National Highways and AECOM stated at the meeting and in National Highways' Deadline 1 response that they would undertake a further review to consider the Applicant's responses and would provide a formal position in the repose to the ExAs Written Question.

2.2.3 In National Highways' view, the following matters are critical and require resolution for it to be satisfied that the construction impact on the SRN has been assessed adequately and that the proposed arrangements are acceptable.

2.3 AADT Data

2.3.1 National Highways requested that discrepancies in the AADT data shown in Table 3-4 of the TA should be updated to accurately reflect the AADT data presented in Appendix C of the TA.

2.3.2 This was amended in Rev B of 6.6.8.1 -Baseline Traffic and Transport Report - Part 1 [APP-172], which was submitted at Deadline 1.

2.3.3 There is no change to the outcome of the assessment. **A review of the data is ongoing and once complete, National Highways will determine whether this matter can be resolved.**

2.4 Sensitivity Testing

2.4.1 National Highways requires that, a summer sensitivity test should be assessed when undertaking junction capacity assessments as the data demonstrates higher than average usage of the A120 during this period.

2.4.2 National Highways is pleased that the Applicant would welcome further discussions on this matter. **Nevertheless, the position remains that this sensitivity test is required.**

2.5 A12 Junction 29 Collision Analysis

2.5.1 National Highways requested detailed analysis of the collisions recorded at A12 Junction 29 should be undertaken to ascertain whether the collisions were as a result of the junction design or road layout.

2.5.2 The Applicant considered that the forecast increase in construction traffic was sufficiently less than the 10%, which is generally the minimum that requires a qualitative assessment of the effects on road safety.

2.5.3 However, National Highways has noted that the North Falls collision analysis indicated that all collisions were due to driver error. **Following the completion of AECOM's review of this assessment, National Highways will be able to determine whether further work is required by the Applicant.**

2.6 Assessment of Impact at Junctions

2.6.1 National Highways' position is that the vehicular impact of the construction activity should be assessed based on a worst-case scenario at each junction individually as opposed to a network wide likely worst-case scenario.

2.6.2 The Applicant does not agree that this is required and cites the DfT's Decarbonisation Policy regarding "Vision and Validate" as one of the main reasons why a worst-case scenario should not be considered.

2.6.3 National Highways recognises the need for a Vision and Validate approach when considering the *operational* impact of proposed developments. However, it does not take the view that this applies to the construction impact of developments, where actual forecasts of construction traffic are likely to reflect an accurate prediction of the required flows to realise the development and mitigation may be more limited. As the purpose of this analysis is to understand a temporary construction traffic impact, **it is considered that a worst-case scenario would be most appropriate given the temporary nature of the works**, unless a mechanism can be agreed that allows affective mitigation measures to be implemented within short timescales, should network/ junction capacity issues arise as a result of the scheme traffic.

2.7 Vehicle Occupancy

2.7.1 National Highways requested that evidence should be provided that demonstrates that a workforce occupancy rate of 1.5 people per car is a realistic assumption.

2.7.2 The Applicant has stated that this occupancy rate was proposed from the start of its engagement with National Highways and that it is considered reasonable and in accordance with National Highways Planning Guidance in accordance with the Government's objective of reducing car dependence.

2.7.3 Given that the occupancy rate refers to the construction of the development, evidence-based rationale is required. **National Highways therefore requests further discussion with the Applicant about how the occupancy rate of 1.5 can be achieved.**

2.8 Trip Assignment

2.8.1 National Highways has requested that the method used to assign the vehicular trips to the SRN should be clarified. When assigning the trips to the network, it is considered that the Temporary Construction Compounds (TCCs) should be used as a destination to inform the trip assignment.

2.8.2 The Applicant considers that sufficient information regarding trip assignment is provided in Appendix T of 6.6.8.2 Traffic and Transport Baseline Report - Part 2 [APP-173].

2.8.3 However, the method of distribution has been presented rather than the method used to assign the trips to the network. **Therefore, National Highways requests that it is confirmed whether each TCC has been considered as a separate destination when assessing the trip assignment.**

2.9 Junction Capacity Assessments

2.9.1 National Highways requires that junction capacity assessments should be undertaken at any SRN junctions that experience an increase of more than 30 vehicles in a peak hour in total. This is the standard approach that National Highways applies to all developments which impact on the SRN.

2.9.2 The figures presented in the latest version of the Transport Assessment (Volume 6, Part 6, Annex 8.1, dated October 2024 and uploaded to PINs on 15th October 2024) suggested that this could apply to the following junctions, based on the forecast data provided.

- A12 Junction 29, although this is marginal
- A120/ Harwich Road junction
- A120 junctions between the B1035 and Harwich, including Bentley Road

2.9.3 **Whilst the Applicant and National Highways are not in complete agreement on the required scope of this work, National Highways welcomes the Applicant's offer of further discussion on this matter.**

2.10 Growth Factors

2.10.1 National Highways requested that the parameters used to derive the growth factors presented within the ES should be clarified. The Applicant explained that the growth factors in 6.3.8 Traffic and Transport Chapter [APP 090] are average weekday growth rates for the assessment of daily flows. National Highways considers that this could understate the potential impacts at junctions.

2.10.2 **National Highways requires that peak period growth rates should be used for any junction assessments undertaken as a result of National Highways' request outlined in this note.**

2.11 Conclusion

2.11.1 National Highways' and AECOM's review of the application documents relevant to the Transport Assessment concluded that there were ten critical issues that required resolution, which were presented to the Applicant.

2.11.2 Two of these have now been resolved to National Highways' satisfaction or can be deferred for later discussion, whilst a further two require further analysis by AECOM before they can be closed out. This leaves six critical matters, which National Highways considers are outstanding. The actions requested by National Highways to resolve these are summarised below:

i) **A summer sensitivity test must be assessed for all junction assessments.**

ii) **The vehicular impact of the construction activity must be assessed based on a worst-case scenario at each junction individually as opposed to a network wide likely worst-case scenario.**

iii) **Evidence is required that explains why a workforce occupancy rate of 1.5 people per car is a realistic assumption.**

iv) **The method used to assign the vehicular trips to the SRN should be clarified. When assigning the trips to the network, the TCCs must be used as a destination to inform the trip assignment.**

v) **A junction capacity assessment must be undertaken at the A120/ Harwich Road junction, the A120/ Bentley Road junction, the A120 / B1035 junction and any other A120 junctions experiencing over 30 additional vehicle movements during the peak hour. Additionally, should the required changes to the trip assignment (see item (iv) above) result in greater impacts at other SRN junctions (over 30 vehicles), these should also be assessed through junction capacity assessments.**

vi) **Peak period growth rates should be used in the assessment of any junctions.**

2.11.3 Resolution of these matters would enable National Highways to conclude that the traffic assessment in respect of the SRN is adequate. National Highways is ready to work with the Applicant to resolve these matters in a constructive, timely and efficient manner.

3. Routing for Abnormal Indivisible Loads (AIL) (TT.1.04)

3.1 Question TT.1.04 is as follows:

"During the course of ISH1 there was discussion of the use of the A120 westbound (from Harwich) as part of the route for AILs (of up to 400 tonnes) needing to access the proposed onshore substation site via Bentley Road. National Highways in its post ISH1 written submission [REP1-066] has commented (paragraph 1.4) that AILs travelling from Harwich on the A120 would need to make a 360 degree turn at the "next" roundabout (presumed by the ExA to be the A120's junction with Harwich Road) in order to enter Bentley Road. In section 4.3 of [REP1-066] National Highways refers to AILs switching carriageways at the Horsley Cross Roundabout.

For National Highways – Clarify what your understanding of the Applicant's AIL routing proposals for accessing Bentley Road via the A120 are, ie making 360 degree turns at the A120's junction with Harwich Road or undertaking lane switches at the Horsley Cross Roundabout."

3.2 On reviewing National Highways' Deadline 1 Submission, it is apparent that the description of the Applicant's AIL proposals is not clear and that the information provided by National Highways in paragraphs 1.4 and 4.2 (sic) can be read as contradictory and is therefore misleading.

3.3 Paragraph 1.4 states that,

"Right-hand turns from the Harwich direction of the A120 onto Bentley Road are not permissible due to the existence of a Vehicle Restraint System, which was implemented on the central reserve in recent years, as a road traffic safety measure. Therefore, vehicles travelling from Harwich, would need to undertake a 360 degree turn at the next roundabout to access Bentley Road."

3.4 This is true of all vehicles, **except** for AILs, which would be unable to make the manoeuvre the roundabout due to the tight geometry. Therefore, a specific arrangement for AILs is proposed, which is agreed in principle by National Highways, subjects to resolution of the matters outlined in the Deadline 1 response. This involves for switching lanes, under a road closure, at Horsley Cross Roundabout. This arrangement only applies to AILs.

3.5 Paragraph 1.4 should therefore have been written as follows (changes to the text are highlighted in bold),

*"Right-hand turns from the Harwich direction of the A120 onto Bentley Road are not permissible due to the existence of a Vehicle Restraint System, which was implemented on the central reserve in recent years, as a road traffic safety measure. Therefore, vehicles travelling from Harwich, would need to undertake a 360 degree turn at the next roundabout to access Bentley Road**, except in the case of Abnormal Indivisible Loads (AILs), for which special arrangements are proposed (see paragraph 4.3 below)**."*

3.6 National Highways apologises to the ExA for the confusion caused.