



Our ref: KM/JB

Your ref: 20048646

Grahame Gould
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12 November 2024

Via E-Mail to:

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Dear Mr Gould,

FIVE ESTUARIES OFFSHORE WIND FARM – EN010115

DEADLINE 3 SUBMISSION

At Issue Specific Hearing 3 on 30 October 2024, you requested an update in respect of the further review being undertaken by our transport consultants, AECOM, in respect of the updated AADT data submitted by the Applicant in Revision C of the Transport Assessment.

We have reviewed the latest versions of the AADT tables and it would appear that:

- Table 8.28 of Document 6.3.8 (Revision C) still shows the same values as Revision B (and therefore Revision A), which appear to still include the incorrect values.
- Table 3-5 of Document 6.6.6.1 (Revision B) does appear to show the correct values and we believe this should be used in any analysis going forward where use of the AADT data is required.

The Institute of Environmental Management and Assessment (IEMA) Guidelines: (2023), Environmental Assessment of Traffic and Movement (GEATM) indicates that DfT has historically set out that traffic flows would have to increase by more than 30% in order for a 'slight' change in severance to occur, 60% for a 'moderate' change to occur and 90% for a 'substantial' change to occur. At this point, the Applicant's analysis (using either set of figures) suggests that there is an increase of less than 30% and therefore the change in severance is slight in either case.



However, National Highways is more concerned about the specific traffic impact at each junction rather than AADT (particularly during the peak hours), which we raised as one of the outstanding concerns in our response to ExQ1 on 22 October 2024.

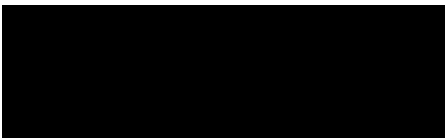
In view of this, National Highways is content to treat the AADT issue as 'resolved' since it is essentially superseded by the other matters raised in our ExQ1 response regarding the traffic impact calculations.

National Highways is meeting with the Applicant and our respective transport consultants on 14 November 2024 to discuss the six outstanding matters raised our ExQ1 response, with a view to seeking a satisfactory resolution.

One of National Highways' other outstanding concerns relates to the proposed use of AILs and the risk that the A120 will not be able to accommodate the particularly heavy loads. We note the Applicant's submission of Technical Note 10.20.3 (REP2-029) at Deadline 2 on 22 October 2024.

There are number of matters contained within this Technical Note with which National Highways does not agree and our concerns about heavy loads on the A120 remain. We consider the risk to be significant. We welcome the Applicant's proposal to undertake a study to investigate potential mitigation solutions and are keen to work collaboratively with them in support of achieving a feasible outcome. We look forward to receiving the draft Proposal from them in due course.

Yours sincerely,



Kelly Milburn
Spatial Planning Manager