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Via email:

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29 August 2023

Dear Sir or Madam,

**Application by Mallard Pass Solar Farm Limited for Mallard Pass Solar Project
The Examining Authority's written questions and requests for information (ExQ2)**

Thank you for providing National Highways with the opportunity to respond on the written questions and requests for information (ExQ2) in respect of Mallard Pass Solar Project.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans and development management proposals. In addition to the Circular, our responses are in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

We note that we have been asked two questions in relation to ExQ2. Please find our answers to these questions below:

Q11.0.4 – Question: The methodology for the assessment of effects in Chapter 9 of the Environmental Statement (ES) (Highways and Access) [APP3-039] is based on the 'Guidelines for the Environmental Assessment of Road Traffic' (GEART), produced by the Institute of Environmental Assessment (IEA) (now the Institute of Environmental Management and Assessment (IEMA)) 1993). It is noted that the IEMA published a new guidance document entitled Environmental Assessment of Traffic and Movement in July 2023. What implications does the new guidance have for the assessment of effects for the Proposed Development?

Q11.0.4 – Answer: National Highways has considered the potential impacts of the Proposed Development on the Strategic Road Network. Our position on the Proposed Development is informed by a range of policy documents and guidance notes including but not limited to the NPPF, Planning Practice Guidance notes, and DfT Circular 01/2022. The latter document in particular, sets out how a developments' impact on the SRN should be assessed.

Given the distance of the development site from the SRN, National Highways is content for other parties (namely the applicant and local highway authorities) to consider the implications of the IEMA guidance.

Q11.0.6 – Question: In relation to cumulative effects, paragraph 9.10.1 of the ES (Highways & Access) states that “*From a Highways and Access perspective, there are no relevant existing or approved developments to consider in relation to the cumulative effects from the Proposed Development due to the limited overlap in construction programme and construction vehicle routing. In any event, the traffic associated with these cumulative developments are accounted for within the TEMPRO growth factors and assessment undertaken in the Base 2026 model.*”

- a) Can the Applicant confirm if the A47 Wansford to Sutton scheme granted consent by the Secretary of State in February 2023 has been taken into account?
- b) Can National Highways provide an indication of the construction programme for the A47 Wansford to Sutton scheme?
- c) It is noted that National Highways has not made specific comments regarding the interaction between the two projects, please can it confirm if it considers if there are any implications during the construction or operational phase of the Proposed Development for the A47 Wansford to Sutton scheme?

Q11.0.6 - b– Answer:

At the moment, the details of the construction programme for our Wansford to Sutton scheme are still indicative and under review. However, we are currently estimating construction to commence in Quarter 4 of the 2023/24 financial year (i.e.: January-March 2024) and for construction to finish in Quarter 4 of the 2025/26 financial year (i.e.: January to March 2026).

Updates will be released on our website as more details emerge. Alternatively, information can be requested at any time by contacting the Project Managers for this scheme:

A47WansfordtoSuttonRIS@nationalhighways.co.uk

Q11.0.6 – c – Answer:

It is our understanding that construction of the Proposed Development is expected to commence ‘Summer 2026 at the earliest’. As such, based on our current projected

timescales for our Wansford to Sutton scheme, there should be no overlap in construction of the two projects.

Notwithstanding this, should the National Highways scheme overrun, there is potential for an overlap in construction periods. In this event, we do not envisage that there will be any implications during the construction of the Proposed Development for the A47 Wansford to Sutton scheme. However, the traffic management for the A47 Wansford to Sutton scheme may impact traffic utilising the A1 and A47 trunk roads to access the Proposed Development. Consideration may therefore need to be given to the management of the Development's construction traffic during this period (if applicable).

In particular, interested parties should note that there will be a combination of periodic overnight and day-time road closures during the construction period. In addition, some current accesses onto the A1 and A47 trunk roads will be permanently closed by the scheme.

Our overnight closures will be intermittent and should have no impact on construction traffic for the Proposed Development which is expected to travel during day-time hours.

We are however planning a 16-day full road closure of a section of the A47 (currently planned for October 2025) and a 2-week closure of the A1 southbound exit and entry slip onto the A47, the dates of which are still to be confirmed.

For any full road closures, we shall be utilising signed diversions routes, and full details will be published on our website well in advance of the closures. We will need to utilise a range of different diversion routes depending on the specific closure, so have attached a separate document (Appendix 1) showing the diversion route maps.

Where possible, our diversion routes utilise other parts of the SRN. However, where this is not possible, we have agreed diversion routes in place with the local highway authorities. Our agreed diversion routes are selected as being the most suitable routes for accommodating heavier traffic flows and HGVs. For the Wansford to Sutton scheme, the diversion routes (where not on the SRN) will be located entirely on Peterborough City Council's highway network. We understand this to be outside the order limits for the Proposed Development, however the Inspector may wish to obtain additional comments from Peterborough City Council.

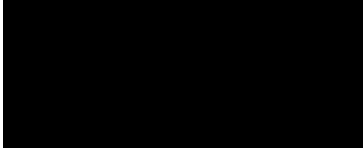
Aside from road closures, other traffic management for our scheme is likely to comprise reduced speeds and narrow lanes on the A1 and A47. These are likely to be in place 24/7 throughout most of our construction period. Our narrow lanes will however be able to accommodate all standard traffic, including HGVs. Any abnormal load movements should be coordinated in the usual way via our abnormal loads team but may be required to use an alternative route.

We do not envisage any impacts associated with the operational phase of the Proposed Development.



We hope the above satisfactorily answers the Inspectors questions directed at National Highways.

Yours sincerely,



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