

Booth, Elliott

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Sent: 02 April 2024 15:58
To: Byers Gill Solar; [REDACTED]
Cc: JSJV Spatial Planning YHNE; Parsons, Jonathan/UWA; Edwards, Richard/LBA; Sunny Ali; Paul Ibbertson; Martin Parker [REDACTED]; Phil Harrison
Subject: FW: BMT19412 EN010139 - Byers Gill Solar - EIA Scoping Notification and Consultation
Attachments: DevTY0138 TM002 Byers Gill Solar Farm NSIP - JSJV Review (JP Issued).pdf
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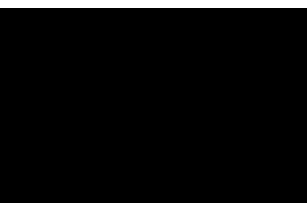
Hi

Please find attached a review from our consultants (JSJV) of the documentation submitted as part of the Byers Gill Solar Farm NSIP application.

You will see from the attached that there are a number of issues in the Transport Statement (TS), and in turn, the Construction Transport Management Plan (CTMP) which are considered unresolved at this point. Additional evidence is therefore required in order for National Highways to understand the trip generating potential of the development proposals in sufficient detail to reach a final response.

We look forward to receiving this further evidence in due course. Please get in touch if there is anything you require from us to assist with this.

Regards



Chris Bell, Planning Manager

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Byers Gill Solar Farm NSIP – JSJV Review

Prepared for: Chris Bell (National Highways)
Prepared by: Jonathan Parsons
Date: 28 March 2024
Case Reference: DevTW0138
Document Reference: TM002
Reviewed/approved by: Richard Edwards

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Overview

The Jacobs Systra Joint Venture [JSJV] have been tasked by National Highways to review documentation produced in support of the Nationally Significant Infrastructure Project [NSIP] known as Byers Gill Solar Farm (reference: EN010139).

The development proposals consists of a proposed solar farm with over 50MW capacity, Solar PV modules and associated mounting structures, inverters, transformers, switch gear and control equipment, a substation, energy storage equipment and underground on and off-site cabling.

National Highways have been consulted as a statutory consultee, and the development proposals are in close proximity to the A1(M), A19 and A66 which form part of the Strategic Road Network [SRN], hence the need to review the documentation prepared in support of the NSIP application to ensure that the development proposals do not materially impact upon the capacity, operation and safety of the SRN.

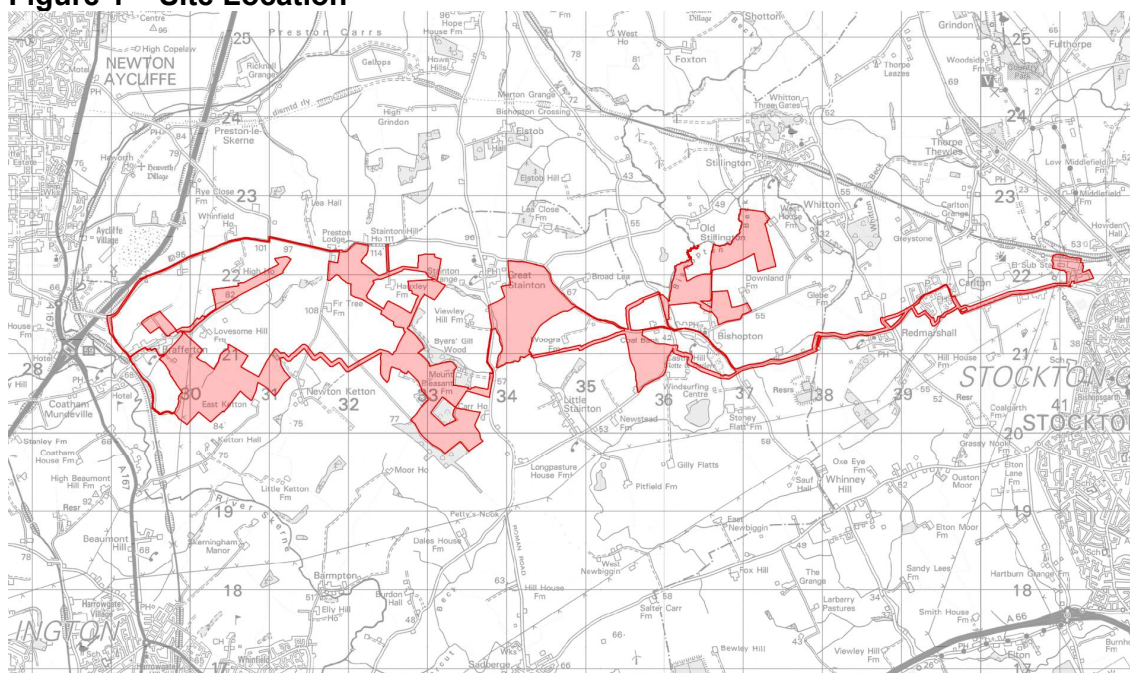
The location of the development proposals can be seen at **Figure 1**.

In November 2022, JSJV reviewed the Environmental Impact Scoping Report [EIA] prepared by JBM Solar [JBM] and the outcomes of that review – TM001 – form the basis and context of this Technical Memorandum [TM].

This TM reviews the contents of the following documentation:

- Transport Statement [TS];
- Environmental Statement (Traffic and Transport) [ES];
- Construction Environmental Management Plan [CEMP];
- Construction Traffic Management Plan [CTMP]; and
- Glint and Glare Assessment [GGA].

A summary and conclusions are provided at the end of this TM.

Figure 1 – Site Location

Source – NSIP Application, Location Plan

EIA Scoping Report Review

JSJV's review concluded the following:

- The SRN, specifically the A1(M), A19 and A66 should be included within the Study Area for assessments of the impact of the development proposals;
- JBM will have to pay due cognisance to how the cabling proposals will impact on the SRN, in terms of installation and maintenance;
- The Environmental Management Plan, CEMP and CTMP will be the key documents – alongside the Transport Assessment [TA] – to assessing the impact of the development proposals at the SRN, and where required, to provide appropriate mitigation. Where possible, the aforementioned documentation should be based on a 'first principles' approach, drawing on the experience of JBM and its appointed contractor, to ensure the development proposals are assessed robustly;
- JSJV requested that any data from the construction of other solar farm developments which is used in calculating the projected construction traffic generation should be included in full within the TA for verification purposes;
- JSJV request that the trip generation estimates take into account the varied sizes of the different solar PV module areas within the assessment of the trip generating potential;
- Given that the SRN should be included in the Study Area, it should be considered and assessed in terms of the impact on the base traffic conditions, which included road safety;
- The operational and decommissioning impacts on traffic will have to be set out by JBM within the relevant documentation;

- The proposed impacts during the decommissioning phase are stated to be similar to the construction phase, and as such, should be assessed accordingly;
- The TA and CTMP should be aligned, as there will be significant crossover between the two documents;
- Collision data for the Study Area should include five years where COVID-19 restrictions were not in place. The study area for collision data should take into account the SRN, paying due cognisance to the comments made in this document regarding the Study Area; and
- With regard to the TA, CTMP and Glint and Glare Assessment, due cognisance needs to be given to the parameters set out in this document.

Transport Statement Review

The TS sets out the following information:

- Baseline Conditions;
- Development Proposals;
- A summary of the ES and CTMP; and
- Conclusion.

Baseline Conditions

It is stated that the surrounding SRN is comprised of the A189 to the north, the A19 to the east, the A66 to the south of the development proposals and the A1(M) to the west. The acknowledgment of the SRN within the TS is welcomed by JSJV, but the inclusion of the A189 is considered to be erroneous.

It is stated that main access routes to the development proposals are as follows:

- All of the sites excluding Panel Areas C and D will access the A1 (M) at junction 59 via the A167 and Lime Lane; and
- Panel Areas C and D will access the A66 / A1150 at the Great Burdon junction via Bishopton Lane.

Furthermore, it is stated that traffic surveys were undertaken between 15/03/23 and 21/03/23 on the local road network, although it is noted by JSJV that the SRN was not included within the study area / data collection.

Public Transport

It is stated that there is little public transport provision surrounding the development proposals, and this conclusion is accepted by JSJV.

Development Proposals

The TS states that the development proposals will comprise of six Panel Areas. In addition, the development proposals will include underground cabling between the Panel Areas and the on-site substation, as well as approximately 10km of underground cable to connect the development proposals to the grid connection at the existing Norton substation (located to the north-west of Stockton-on-Tees) with both on-road and off-road options being considered. However, it is noted by JSJV that there will be no cabling interfacing with the SRN.

Construction Period

It is stated that the construction period of the development is expected to take between 12-18 months or 18-24 months; and during this period there would be trips associated with the arrival and departure of construction staff and the delivery of construction materials.

Furthermore, it is stated that staff trips are expected to be made by large cars (seven-seat vehicles have been assumed), while deliveries of construction materials and plant will mainly be made by heavy goods vehicles (HGVs). This is noted by JSJV, but there is no explanation as to the rationale behind the assumption drawn on the size of staff vehicles.

In addition, it is stated that the construction traffic is expected to use the most direct available route to the SRN and it is expected that construction hours will be 08:00 - 18:00 Monday to Friday and 08:00 - 14:00 on Saturday with no activities on Sunday or Public / Bank Holidays. This is noted by JSJV.

Trip Generation

It is stated in the TS that to forecast the trip generation associated with a solar farm development, the TS has sourced examples of similar developments from elsewhere. This approach is welcomed by JSJV.

Furthermore, the TS states that the construction programme assumes that three of six Panel Areas will be constructed at any given time during the construction phase of the development proposals and the trip generation is formed of delivery trips and employee trips and has been calculated as follows:

Delivery Trips

It is stated that construction delivery trips have been estimated by JBM / RWE based upon other recently developed sites / similarly sized sites promoted by the applicant.

The TS states that based on recently developed sites, there is an estimate of 36 trips (72 two-way trips) across the development proposals; and these trips have been distributed across each Panel Area proportional to its approximate size to understand how many trips each Panel Area could generate.

Whilst the 'first principles' approach to trip generation is welcomed, no supporting evidence from other sites has been included within the TS to provide justification for its use.

Based upon the trips assigned to each Panel Area, the construction traffic has been assumed to route to the SRN using the most appropriate route according to Google Maps whilst considering weight limit restrictions and avoiding residential villages. JSJV has reviewed the trip distribution and assignment presented in Appendix B of the TS, and the figures presented as the 'daily average' and not considered within the respective Morning and Evening Peak hours. As such, it is not possible for JSJV to draw any conclusions on the impact of HGVs on the efficient operation of the SRN.

Employee Trips

It is stated that it is expected that three sites will be constructed at any given time during the construction phase of the development proposals, and that each site could require up to 100 employees (300 on site at any one time).

In a similar approach to the delivery trips, it is stated that based on similar sites constructed elsewhere, employees are expected to travel to the site in groups, with

other sites suggesting large cars or minibuses are generally used to transport staff. Again, a vehicle occupancy of seven staff per vehicle has been assumed; and this is forecast to result in approximately 15 car / LGV trips to each site (30 two-way movements). As previously stated, no evidence from previous sites has been provided to justify this.

Similar to the routing of delivery vehicles, the TS states that employee trips are assumed to route to the SRN using the most appropriate route according to Google Maps whilst considering weight limit restrictions and avoiding residential villages. JSJV has reviewed the trip distribution and assignment presented in Appendix B of the TS, and the figures presented as the 'daily average' and not considered within the respective Morning and Evening Peak hours. It is stated that staff trips will arrive before the network Morning Peak and depart after the network Evening Peak due to the proposed working hours, although no shift patterns or details are provided. As such, it is not possible for JSJV to draw any conclusions on the impact of HGVs on the efficient operation of the SRN.

Total Construction Trips

The TS states that an assumption of the assessment is that a maximum of three Panel Areas will be constructed at any given time, although as it is not known which three Panel Areas might be constructed at once, the assessment assumes trips for all Panel Areas with each road capped to the average trips of three Panel Areas, in order to assess the impact. It is considered by JSJV that more certainty within the construction profile would be appreciated, it is further considered that more detail may be provided by the applicant as the application emerges.

As such, the TS The average trips of three Panel Areas for construction delivery trips produces a cap of 18 HGVs (36 two-way movements) per day; although it is acknowledged in the TS that if the three largest Panel Areas were constructed at once, each expected to generate eight HGV trips, a maximum of 24 HGV trips (48 two-way movements) could travel to the study area each day.

Furthermore, it is stated that across three sites, the employee trips could generate 45 car trips (90 two-way movements); and therefore, the total forecast HGV and staff trips, to three Panel Areas, would be 63 vehicles (126 two-way movements), on average, during the construction phase. And in the very worst case where the three largest Panel Areas are built simultaneously, it is stated that 69 vehicles (138 two-way movements) could be expected within the network.

Whilst this is noted by JSJV, due cognisance should be paid JSJV's comments regarding the approach to trip generation and how this relates to Morning and Evening Peak impacts.

Committed Development Trips

It is stated that the potential overlap with traffic from other developments within the vicinity has been considered. Those committed developments that would use routes within the Study Area have been identified and any additional vehicle trips on those routes have been included in the future baseline scenario.

Developments considered are detailed in the TS, but this is considered to be a matter for Darlington and Stockton Councils to confirm their acceptance of.

Effect of Construction Trips on Future Baseline

It is stated in the TS that the percentage change of the development proposals' total construction trips compared to the future baseline has been calculated to assess the

impact the development will have on the network. This is noted by JSJV, however, percentage impact is not considered to be an accepted methodology for assessing the impact of development proposals at the SRN.

Furthermore, the TS states that the network diagram of the percentage change impact of the development proposals' construction trips on the future baseline can be seen in Appendix D of the TS and that during the construction phase, the majority of roads within the study area see an increase of less than 10%.

Having reviewed the network diagram, from the information presented, it is apparent that the construction trips generated will not have a significant impact at the SRN, notwithstanding the issues JSJV has already raised regarding this element of the trip generation.

Construction Vehicle Types

The TS states that the vehicles travelling to the development proposals will generally be standard construction and use HGVs with a maximum length of 16.5m. In addition, it is stated that there is expected to be the requirement for two abnormal loads to travel to the site, to deliver sub-station components to Panel Area C; and these are considered abnormal due to the weight of the load, rather than dimensions of the load. This is noted by JSJV.

It is stated that the preference for these loads to reach the sub-station site is from the A66. As such, it is recommended that the applicant liaises with National Highways' Abnormal Loads team (abnormal.loads@nationalhighways.co.uk) at the earliest opportunity.

Operational Period

The TS states that once the solar farm is fully operational, there will be no staff based on site; and that it will not generate any significant traffic movements, with security and maintenance staff the only occasional visitors. This is noted by JSJV, and it is considered by JSJV that the impact of operational traffic at the SRN will be negligible at worst.

Environmental Statement (Traffic and Transport) Review

It is stated that the ES considers:

- The traffic and transportation baseline, established from desk studies and surveys;
- Potential environmental effects on traffic and transport;
- The assessment methodology used to complete the impact assessment; and
- Highlights any necessary monitoring and/or mitigation measures that could impact on potential environmental effects that were identified in the Report.

In addition, it is stated that the ES chapter aims to:

- Give details of relevant legislation, policy and guidance that has informed the assessment;
- Provide detail of the assessment methodology used to complete the impact assessment;
- Describe the potential effects of the development proposals on traffic and transport; and

- Describe the design mitigation and enhancements at the construction, operation and decommissioning phases of the development proposals.

Assessment Methodology

Desk Based Study

The ES states that analysis has been undertaken to inform the baseline conditions and the analysis undertaken includes:

- Analysis of baseline traffic data;
- The analysis of collision data (sourced online from the crashmap website) on the local road network and surrounding SRN for the period 2015 to 2019; and
- The analysis of traffic routing to determine the most appropriate route from the SRN to the Panel Areas.

Assessment Assumptions and Limitations

It is stated that construction traffic has been forecast and capped to a maximum of deliveries and trips to three Panel Areas within the Study Area. It is considered by JSJV that this is consistent with the approach detailed in the TS, and is therefore accepted.

Furthermore, it is noted by JSJV that there is a lot of common ground between the assumptions drawn in this section of the ES and the contents of the TS. And as such, for brevity, it is not considered prudent to replicate JSJV's comments from the review of the TS, and with this in mind, JSJV's comments on the TS remains valid for the ES.

Baseline Conditions

Existing conditions

It is stated in the ES that collision data covering the study area has been sourced, for the period 2015 to 2019 inclusive, from crashmap.com; and that the study period was selected as this removes Covid years, increasing accuracy. Furthermore, it is stated that the study area includes the local road network and the SRN.

It is considered by JSJV that it might be more prudent to source accident data from the local authorities that comprise the study area, as well as including some more up-to-date data, post Covid-19 restrictions, however, the broad approach taken by the applicant is welcomed by JSJV.

The ES does not conclude as to whether it is considered that the study area has a safety problem that the development proposals will exacerbate, however, JSJV has reviewed the information provided, and it is considered that there is no existing safety issue that will be exacerbated by the development proposals.

Future Baseline

As with JSJV's comments on the TS, committed developments considered are detailed in the ES, but this is considered to be a matter for Darlington and Stockton Councils to confirm their acceptance of.

Potential Impacts

Construction

The ES states that the construction phase is of a temporary nature, however, during this temporary period the traffic generated by the development proposals could have the following effects:

- Severance;
- Driver delay;
- Changes to pedestrian, horse riding and cyclist amenity; and
- Accidents and safety.

Decommissioning

The ES states that the decommissioning of the development proposals could give rise to a similar level of effects as the construction phase. However, it is stated that given that the future baseline transport conditions are likely to have changed significantly when the development proposals are decommissioned, it is not proposed that any further assessment of traffic and transport be undertaken for the decommissioning phase.

Given that no timescales are presented within the ES regarding decommissioning, it is considered by JSJV that it would be difficult to undertake an assessment of the decommissioning phase for an unknown assessment year. However, it is considered by JSJV that applicant should undertake a form of assessment closer to the time, to identify any potential issues involving HGVs and / or abnormal loads and the SRN.

As such, it is recommended by JSJV that National Highways commissions a Decommissioning Traffic Management Plan, to ensure that the operation of SRN is not significantly impacted upon by decommissioning activities.

Assessment of likely significant effects

Construction Service and Delivery Vehicle Trips

It is noted by JSJV that there is a lot of common ground between the assumptions drawn in this section of the ES and the contents of the TS. And as such, for brevity, it is not considered prudent to replicate JSJV's comments from the review of the TS, and with this in mind, JSJV's comments on the TS remains valid for the ES.

Construction Worker Trips

Again, it is noted by JSJV that there is a lot of common ground between the assumptions drawn in this section of the ES and the contents of the TS. And as such, for brevity, it is not considered prudent to replicate JSJV's comments from the review of the TS, and with this in mind, JSJV's comments on the TS remains valid for the ES.

Construction Environmental Management Plan Review

JSJV has reviewed the CEMP, and it is noted that there is plenty of common ground between the TS and CEMP. As such, for brevity, it was not considered prudent to replicate the review within this section of the TM.

Construction Traffic Management Plan Review

The CTMP sets out the following information:

- Details of the development proposals, its location and existing site accessibility;

- The future highway network on which the outline CTMP is based;
- A summary of the HGV and staff vehicle movement which are expected to be generated across the construction period;
- A summary of the proposed measures to manage the impact of construction trips on the highway network, and pedestrian and cycle routes, during the construction phase; and
- Conclusion.

The Proposed Development

Site Accessibility

The CTMP states that the surrounding SRN is comprised of;

- The A189 to the north;
- The A19 to the east;
- The A66 to the south; and
- The A1(M) to the west of the development proposals.

The acknowledgement of the SRN within the CTMP is welcomed by JSJV, however the comments within the TS remain the same regarding the inclusion of the A189.

Construction Movements

Construction Programme

As previously highlighted with the TS, the construction programme details are also covered within the CTMP, and as such, JSJV acknowledge the information provided. As this section of the CTMP mirrors that of the TS, it has not been re-reviewed in this section of the TM, however, JSJV's comment remain valid.

Construction Vehicle Distribution

As previously highlighted with the TS, the construction vehicle distribution is also covered within the CTMP, and as such, JSJV acknowledge the information provided. As this section of the CTMP mirrors that of the TS, it has not been re-reviewed in this section of the TM, however, JSJV's comment remain valid.

Operational Trips

The CTMP states that that based on evidence from solar farm developments elsewhere, it is forecast that when the development proposals are operational, a small number of maintenance trips are expected.

This is in line with the comments made within the TS and ES and remains accepted by JSJV.

Decommissioning Trips

It is stated that the decommissioning of the development proposals could give rise to the same level of forecast trip generation as the construction phase of the development proposals. Therefore, the commissioning stage will be used as a proxy to determine the potential impacts of the decommissioning phase.

This is in line with the comments made within the ES, thus JSJV's comments regarding the decommissioning trips remain valid.

Site Access, Parking and Routing

The CTMP sets out the likely access, parking numbers and routing to the development proposals, split into each Panel Area, and it consistent with the information provided within the TS.

Management Measures

This section of the CTMP outlines the commitments made by the applicant to ensure a safe and practical approach is taken to works regarding traffic management during the construction phase. This approach is welcomed by JSJV.

Traffic Management and Signage – Traffic Management and Monitoring

It is stated that the CTMP recommends that the proposed Traffic Management and Monitoring during the construction phase should include:

- The provision of information to contractors / those travelling to the site such as:
 - Providing a copy of the CTMP
 - Putting a map of the agreed routes online; and
 - Agreeing any necessary signage with the relevant Highway Authority.

This approach is welcomed by JSJV.

Traffic Management and Signage – HGV Timing Restrictions

The CTMP states that in order to reduce the potential impact of HGV deliveries, site management will be responsible for the scheduling for arrival and departure times of deliveries to minimise the number of HGVs travelling to the Panel Areas during the network peak hours on the local highway network.

This is welcomed by JSJV, whilst paying due cognisance to JSJV's previous comments regarding the approach taken to trip generation within the TS..

Site Management and Delivery System

It is stated within the CTMP that a dedicated Site Manager will be appointed for the management of the delivery booking system during the construction phase; and furthermore the CTMP states that deliveries will be scheduled to avoid morning and evening peak hours. In addition, construction personnel will be encouraged to car-pool, or to travel to the development proposals in minibuses.

This is in line with the comments made within the TS, thus JSJV's comments above remain valid.

Communications Strategy

The CTMP states that a communications strategy will be developed by the applicant to ensure that the measures contained within the CTMP are communicated to the workforce and local residents kept informed during the construction period.

In addition, it is stated within the CTMP that regular meetings will be held to discuss HGV management and to address any issues associated with travel to / from the Panel Areas, as well as to relay information including any restrictions and requirements which should be followed.

This approach is welcomed by JSJV.

Overall, it is considered that the CTMP needs to provide further information – in line with the comments made in this TM regarding the TS and CTMP – in order to provide

JSJV with surety that the development proposals will not have a significant impact at the SRN during peak hours.

Glint and Glare Assessment Review

JSJV has undertaken a high-level review of the Glint and Glare Assessment [GGA] prepared by PagerPower. From the information provided within the GGA, it is considered that none on the panels proposed across the Panel Areas would be visible from the SRN, and as such, glint and glare from the development proposals is not considered to be an issue for users of the SRN.

Summary and Conclusions

The Jacobs Systra Joint Venture have been tasked by National Highways to review documentation produced in support of the Nationally Significant Infrastructure Project known as Byers Gill Solar Farm (reference: EN010139).

The development proposals consists of a proposed solar farm with over 50MW capacity, Solar PV modules and associated mounting structures, inverters, transformers, switch gear and control equipment, a substation, energy storage equipment and underground on and off-site cabling.

National Highways have been consulted as a statutory consultee, and the development proposals are in close proximity to the A1(M), A19 and A66 which form part of the Strategic Road Network, hence the need to review the documentation prepared in support of the NSIP application to ensure that the development proposals do not materially impact upon the capacity, operation and safety of the SRN.

In November 2022, JSJV reviewed the Environmental Impact Scoping Report prepared by JBM Solar and the outcomes of that review – TM001 – form the basis and context of this Technical Memorandum.

This TM has reviewed the contents of the following documentation:

- Transport Statement;
- Environmental Statement (Traffic and Transport);
- Construction Environmental Management Plan; and
- Construction Traffic Management Plan.

On the basis of this review, the recommendation to National Highways in relation to this development proposals is:

Holding Recommendation – further information required (as identified below)

This review has highlighted the following deficiencies as follows:

- 1) It is stated that staff trips are expected to be made by large cars (seven-seat vehicles have been assumed), while deliveries of construction materials and plant will mainly be made HGVs This is noted by JSJV, but there is no explanation as to the rationale behind the assumption drawn on the size of staff vehicles;
- 2) Whilst the ‘first principles’ approach to trip generation is welcomed, no supporting evidence from other sites has been included within the TS to provide justification for its use;

- 3) Based upon the trips assigned to each Panel Area, the construction traffic has been assumed to route to the SRN using the most appropriate route according to Google Maps whilst considering weight limit restrictions and avoiding residential villages. JSJV has reviewed the trip distribution and assignment presented in Appendix B of the TS, and the figures presented as the 'daily average' are not considered within the respective Morning and Evening Peak hours. As such, it is not possible for JSJV to draw any conclusions on the impact of HGVs on the efficient operation of the SRN;
- 4) The TS states that an assumption of the assessment is that a maximum of three Panel Areas will be constructed at any given time, although as it is not known which three Panel Areas might be constructed at once, the assessment assumes trips for all Panel Areas with each road capped to the average trips of three Panel Areas, in order to assess the impact. It is considered by JSJV that more certainty within the construction profile would be appreciated, it is further considered that more detail may be provided by the applicant as the application emerges. It may be prudent for this approach to be controlled via the CTMP;
- 5) Committed developments considered are detailed in the TS, but this is considered to be a matter for Darlington and Stockton Councils to confirm their acceptance of;
- 6) It is stated that the preference for abnormal loads to reach the sub-station site is from the A66. As such, it is recommended that the applicant liaises with National Highways' Abnormal Loads team at the earliest opportunity;
- 7) It is recommended by JSJV that National Highways commissions a Decommissioning Traffic Management Plan, to ensure that the operation of SRN is not significantly impacted upon by decommissioning activities;
- 8) It is noted by JSJV that there is a lot of common ground between the assumptions drawn in this section of the ES and the contents of the TS, and with this in mind, JSJV's comments on the TS remains valid for the ES;
- 9) The ES states that the decommissioning of the development proposals could give rise to a similar level of effects as the construction phase. However, it is stated that given that the future baseline transport conditions are likely to have changed significantly when the development proposals are decommissioned, it is not proposed that any further assessment of traffic and transport be undertaken for the decommissioning phase. Given that no timescales are presented within the ES regarding decommissioning, it is considered by JSJV that it would be difficult to undertake an assessment of the decommissioning phase for an unknown assessment year. However, it is considered by JSJV that applicant should undertake a form of assessment closer to the time, to identify any potential issues involving HGVs and / or abnormal loads and the SRN; and
- 10) In broad terms, JSJV are content with the contents of the CEMP and CTMP, but it is considered that the CTMP needs to provide further information – in line with the comments made in this TM regarding the TS and CTMP – in order to provide JSJV with surety that the development proposals will not have a significant impact at the SRN during peak hours.