

## Application for EPE for an Order Granting Development Consent

Reg Identity Number: [REDACTED]

### Traffic and Access Impacts, Local Highways and Site Visit Adequacy

#### Introduction

This submission raises concerns regarding the robustness of the Applicant's assessment of construction traffic associated with Site B, particularly in relation to access points SA03–SA06 on Great Staughton Road. It also highlights the interaction with existing agricultural use of this route and the importance of the Examining Authority's site visit in fully understanding both highway constraints and the wider landscape context. It also raises concerns about the limited site visit to Hoo Farm.

#### 1. Traffic Assessment – Lack of Breakdown by Access Point

The Applicant's Outline Construction Management Plan (Sections 5.1.8 and 5.2.1–5.2.2) identifies multiple access points serving Site B from Great Staughton Road (SA03, SA04, SA05 and SA06), including the upgrading of existing field gate accesses to accommodate construction traffic.

However, the accompanying traffic-flow information appears to assign only minimal construction vehicle movements to these access points, despite the scale of development proposed.

In particular:

- SA03 serves approximately 4 hectares
- SA04 serves approximately 6.25 hectares
- SA06 serves approximately 20 hectares

The application does not explain how these areas can be constructed with such limited access movements. For clarity, a detailed breakdown of construction traffic by access point and activity type (including HGVs, deliveries, staff vehicles and plant) is required, rather than aggregated site-wide totals.

The application does not:

- Break down construction logistics by access point
- Explain delivery volumes or frequency
- Clarify workforce access arrangements
- Identify plant and machinery movements
- Set out any internal haul or distribution strategy

This creates uncertainty as to whether construction traffic on Great Staughton Road has been materially underestimated. Within the Applicant's Draft Site Visit Itinerary the section intended to cover the section Gt Staughton Rd is describe as a 'drive through'. Given the number of proposed access points, the narrow rural nature of the road and the concerns regarding construction traffic interaction, this is not adequate. It does not allow appreciation of:

- Road width and passing constraints
- The relationship between Access Points SA03-SA06 and the road
- Interaction between HGVs and large agricultural vehicles

#### 2. Impact on Agricultural Access

Great Staughton Road is also used to access our farm, which directly borders the proposed Site B development. During peak agricultural periods, particularly harvest, large and slow-moving machinery (including tractors, trailers and combines) must use this stretch of highway to move between fields and farms. The road is narrow and rural in character, with limited passing opportunities. The introduction of construction traffic, particularly HGVs, is likely to result in conflict with agricultural vehicles.

Potential impacts include:

- Difficult or unsafe passing manoeuvres
- Delays to time-sensitive farming operations
- Temporary obstruction of the highway
- Increased risk where vehicles are forced onto verges or to reverse

These interactions have not been adequately assessed or explained within the Applicant's submissions.

#### 3. Importance of Site Visit – Hoo Farm (Traffic and Landscape Context)

The proposed site visit stop at Hoo Farm is particularly important in understanding both highway constraints and the wider landscape context of Site A and B. I welcome that the Examining Authority is already due to visit the public footpath at Hoo Farm, as requested by SEPE, to experience selected LVIA viewpoints and views of surrounding settlements and landscape features. While useful, this stop is necessarily limited in scope and reflects only specific LVIA receptor locations. It is therefore respectfully requested that a short additional stop is made at the elevated viewpoint on land at the top of the hill at Hoo Farm (with landowner permission). From this location there is a true panoramic view of the wider landscape, including:

- The River Kym valley and floodplain
- Little Staughton Church on the opposite valley side
- The surrounding rural road network, including Great Staughton Road and the area around the Kangaroo junction
- The relationship between Site A and Site B and the wider topography and settlement pattern

Unlike the LVIA viewpoints, which are necessarily framed and selective, this location provides a continuous panoramic view, enabling a clearer understanding of how the proposed development would sit within the wider landscape and highway network. It also provides valuable context for understanding how construction traffic would interact with existing rural movements on a physically constrained road system.

#### Conclusion and Request

Taken together, the lack of a detailed breakdown of construction traffic, the absence of adequate consideration of agricultural access, and the physical and visual constraints evident from the Hoo Farm viewpoints raise concerns about the robustness of the Applicant's assessment of impacts on Great Staughton Road. There is a risk that construction traffic—particularly HGV movements—has been materially underestimated, with implications for road safety, agricultural operations, and the wider rural landscape.

The Examining Authority is therefore requested to:

1. Require a detailed breakdown of construction traffic by access point (SA03–SA06) and activity type

2. Seek clarification of construction logistics and vehicle assumptions for Site B
3. Consider the interaction between construction traffic and agricultural vehicle movements on the Great Staughton Rd.
4. Include a short additional stop at the elevated Hoo Farm viewpoint to fully understand the highway constraints, landscape and floodplain context and the relationship between Site A and B settlements and the road network.

The ExA is respectfully requested to give full consideration to the matters I have raised and to seek further clarification from the Applicant to make sure the assessment of construction traffic, access impacts and site visit arrangements is robust and adequately evidenced.