

Submission ID: S466A7AC9

'Comments on any updated or additional documents from the Applicant:

Applicant's drive-through of local highway network – note to accompany SEPE video' is submitted as an accompanying note to the SEPE video for which a submission request has been made ahead of Deadline 2

## **East Park Energy Development Consent Order (EN010141)**

### **Comments on any updated or additional documents from the Applicant: Applicant's drive-through of local highway network**

Stop East Park Energy (SEPE) is an independent, community-led group established in response to the proposed East Park Energy solar and Battery Energy Storage System (BESS) development. The group, which operates on an unfunded, entirely voluntary basis, has more than 1,000 registered supporters, and comprises residents, landowners and stakeholders from across Hail Weston, Great Staughton, Little Staughton, Pertenhall, Keysoe, Swineshead, and neighbouring settlements including Perry, Stonely, Kimbolton, Catworth, Buckden and St Neots, all of whom may be directly or indirectly affected by the project.

#### **Introduction**

This submission provides a critical review of the Applicant's submitted drive-through video intended to illustrate the proposed construction traffic routes associated with the development. While such visual material can be a useful supporting tool, the video in its current form does not present a sufficiently comprehensive, accurate or contextualised representation of the route network.

The observations set out below identify a number of significant omissions, inconsistencies and areas of concern. These issues limit the reliability of the video as an evidence base for assessing traffic impacts and, in particular, may raise questions regarding the adequacy of safety considerations for both construction traffic and existing road users.

#### **1. Incomplete and poorly contextualised route information**

The video fails to provide a complete and properly contextualised route overview. Key omissions include:

- Missing sections of the route – for example, site access junctions which require construction traffic to use short sections of the public highway along Great Staughton Road
- Lack of clarity on vehicle type used for the drive-through
- No indication of recording date or time
- No accompanying map or plan to show drive-through sections

- Use of a one-way (non-bidirectional) drive-through, which may minimise or obscure the identification of potential safety risks associated with opposing vehicle movements and real-world traffic conditions

## **2. Failure to identify local access and hazard points**

The video focuses solely on the solar and battery power complex entrance and overlooks numerous existing access points that present safety risks, particularly along winding sections. These include:

- Burial Ground entrance
- Wood End Farm
- Fairytale Marquees
- Adjacent farm entrances
- Residential properties (eg house with lion gateposts)

These locations are critical due to limited visibility and turning movements.

## **3. Unclear traffic conditions during filming**

The video shows unusually light traffic on the B645. It is unclear what day of the week or time of day the footage was recorded, raising questions about how representative the conditions are.

## **4. Evidence of constrained road handling even in light vehicle**

Although the drive-through appears to have been conducted in a standard car, the footage demonstrates that the journey is not straightforward or smooth, and appears at points to involve corrective steering or constrained manoeuvring. This is particularly the case along the Pigg's Hill section of the B645, a well-known accident blackspot locally described as a sharp, treacherous bend characterised by poor road conditions, including surface water pooling that is particularly dangerous in the dark and winter driving conditions. It is also evident on other bends or banked passages along the route, reinforcing concerns about how much more challenging these sections would be for volumes and convoys of much larger, loaded HGVs, including two-way project construction traffic on these single carriageway roads.

## **5. Lack of wider road network context**

The video does not place the proposed routes within the broader local road network. For example, two of the roads identified for disruption are in fact two of the three principal access routes into Little Staughton, yet this significance is not acknowledged.

This applies to other villages and other sections of the route.

## **6. Missing context at key junctions**

The approach to the junction at Green End, Pertenhall (connecting to the B660 from Great Staughton), is excluded. The video resumes only after the left-hand turn, omitting a blind junction where HGVs swinging wide could pose a significant collision risk. This omission is particularly concerning.

## **7. Incomplete representation of Hail Weston access points**

In the Hail Weston section, only a minor road (Birds Lane) is acknowledged. The main access routes – High Street at both ends of the village and Green End Lane – are omitted, despite being the primary entry and exit points for residents.

## **8. Omission of additional construction traffic routes**

The developer indicates that other roads will be used during internal road construction and potentially during decommissioning. These roads have not yet been clearly identified or assessed, and the period of time such roads would be used in this way has not yet been made clear. Given the substantial volume of materials to be transported by HGVs, these additional routes should be clearly identified and assessed.

## **9. Potential use of unassessed rural roads**

There is a clear concern that, despite proposed traffic controls, additional rural roads within the local network may be used by project construction traffic. These routes are neither referenced nor assessed in the drive-through video, creating uncertainty about the full extent of traffic impacts. Given the scale of HGV movements anticipated, the omission of these additional roads raises significant questions about whether the assessment fully captures real-world traffic behaviour and routing.

## **10. Seasonal and weather-related risks**

The video does not account for how these rural roads will appear to unfamiliar HGV drivers in adverse conditions, such as winter darkness, rain, mud or snow – particularly when compounded by construction traffic.

## **11. Additional infrastructure works not fully considered**

The video does not adequately reflect other associated works, such as:

- Modifications to the main site entrance
- Alterations to junctions (eg Great Staughton to Little Staughton road) to accommodate HGV turning movements, including AIL movements

These changes will have further traffic and safety implications that are not addressed.

## **Conclusion**

In summary, the drive-through video falls short of providing a robust or representative assessment of the proposed construction traffic routes. The cumulative effect of the omissions identified – including incomplete route coverage, lack of contextual information, absence of realistic traffic conditions, and failure to address key hazards and access points – significantly undermines its evidential value.

Of particular concern is the potential for safety risks to be understated, especially given the reliance on a simplified and non-bidirectional representation of vehicle movements and the omission of critical junctions and local access routes. When considered alongside the scale and nature of anticipated construction traffic, including heavy goods vehicles and abnormal loads, these gaps are material.

It is therefore recommended that a more comprehensive and transparently evidenced assessment is undertaken. This should include full route mapping, representative traffic conditions, two-way vehicle movements, and detailed consideration of all affected roads, junctions and receptors, including proposed construction access points where they interact directly with the public highway, in order to provide a more reliable basis for evaluating traffic and safety impacts.

## **Notes:**

The following submissions should be read/viewed in conjunction with, and are relevant to, a range of issues raised in this document.

1. A further, more detailed submission on construction traffic issues is being made by SEPE at Deadline 2.
2. A film submission (accompanied by a note) showing a section of the construction traffic route from the perspective of an HGV cab has been requested by SEPE ahead of Deadline 2.

28 April 2026

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This document accompanies SEPE's submitted HGV partial construction traffic route video and is intended to assist the Examining Authority in understanding both the content of the footage and its relevance to the assessment of the proposed construction traffic route.

### **Purpose of the footage**

The video provides supplementary visual evidence of the physical characteristics and operational context of the proposed main construction access route to Site D (SA16), viewed from the perspective of a heavy goods vehicle (HGV).

It has been prepared by SEPE in response to concerns that the Applicant's filmed drive-through does not reflect the experience or operational characteristics of HGVs. In particular, a standard vehicle drive-through does not adequately capture constraints arising from vehicle size, turning radius, road positioning and interaction with oncoming traffic and roadside features.

The footage is intended to support a more realistic and representative understanding of the route in real-world conditions, beyond what can be conveyed through plans, modelling or written submissions alone.

### **Nature of the recording**

The footage was recorded at approximately 10:00am on 16 April 2026 from the cab of a Scania 6x2 tractor unit (unladen, without trailer). The vehicle travelled a

representative route from the A1 via the A1/B645 junction, along the B645 through Hail Weston, and down Pigg's Hill to the proposed main construction site entrance at Site D (SA16).

The video follows a continuous and sequential journey, capturing the route as experienced by an HGV driver.

### **Content shown**

The footage illustrates, in sequence:

- the approach from the A1 and interaction with the A1/B645 junction;
- the alignment and geometry of the B645 through Hail Weston;
- the relationship of the route to residential frontages and properties adjoining the highway;
- road width characteristics, particularly along constrained sections;
- bends, changes in alignment, and forward visibility conditions;
- the descent along Pigg's Hill and approach to the proposed site entrance;
- the interaction between route geometry and HGV manoeuvrability; and
- the general operational context of the route from an HGV perspective.

The footage demonstrates that the experience of the route differs materially when undertaken by a heavy goods vehicle, highlighting constraints not apparent in smaller vehicle assessments.

### **Route suitability and constraints**

The exercise also highlights a critical issue: it is not possible to complete all sections of the proposed construction traffic route using an HGV due to existing weight restrictions across significant sections.

The presence of these restrictions indicates that parts of the route are not suitable for vehicles of this scale, raising questions regarding the robustness and realism of the Applicant's assessment of construction traffic impacts over multi-year construction, replacement campaign and decommissioning phases.

### **On-screen aids**

To assist interpretation, the footage includes:

- caption text identifying direction of travel, junctions, landmarks and properties fronting the B645; and
- privacy redaction measures obscuring vehicle registration numbers and any identifiable faces.

These features are included to aid orientation and ensure privacy.

### **How the footage should be read**

The video is intended as supplementary visual material and should be read alongside submitted plans, written representations and other examination documents.

It is not a substitute for those materials, but a visual aid to assist the Examining Authority in understanding the real-world characteristics, constraints and operational context of the proposed construction traffic route.