East Park Energy Solar Project

DCO Application 010141

Submission by Phil Wayles on the Applicant's A1/B645 Junction Technical Note

The Applicant has prepared a "Technical Note on Impact on B645 / A1 St Neots Junction" (Document Reference: EN010141/DR/8.23) in response to comments raised by National Highways and the Local Highway Authorities (LHAs) - Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC) - both in their Relevant Representations and at ISH2.

There will be considerable extra local traffic generated at peak times when the construction workers arrive and leave the numerous sites and compounds. National Highways commented in their Relevant Representation about the "*significant volume of trips presented*" at peak times and requested junction impact assessment to be undertaken, including for the A1/B645 junction.

Para 2.2.3 stated "*Classified turning count and queue length surveys were undertaken at each of these junctions on Wednesday 11th March 2026, covering a 12-hour period between 07:00 and 19:00.*" This not standard practice and usually clients such as National Highways would commission a 7-day Automatic Traffic Count to check that the day the classified count was done was typical and representative (i.e. there were no incidents or events in the locality that may have affected traffic flows on that particular day).

Para 2.4.1 states "*In order to presents a robust appraisal of the likely impact on the A1 St Neots junction, this assessment has taken into account traffic associated with the proposed High Wood Solar Farm. As described in Section 9.11 of ES Vol 1 Chapter 9 Traffic and Transport [APP-045], this was the only committed development that has the potential to result in any significant cumulative impacts with regard to the impact of construction traffic*." This appraisal only considers the construction phase**.** The appraisal does not consider or model the impact for the operational replacement works and decommissioning works planned some 20-40 years in the future. Traffic flows would be much increased in these future years. The Applicant should generated the traffic forecasts for when the replacement and decommissioning works are planned using the agreed growth factors, and model and assess the impact on queue length and junction capacity.

In the TN, the Applicant states the A1/B645 junction effectively comprises three separate junctions:

- A1 northbound exit and entry slip roads form a priority T-junction with the B645
- A1 southbound exit and entry slip roads connect to Great North Road via a mini roundabout junction.
- B645/Great north Road/B1048 mini roundabout junction

The A1 northbound exit and entry slip roads/B645 part of the junction is modelled using PICADY module within the TRL software package Junctions 10. However, the guidance stated PICADY is used for modelling isolated 3 and 4 arm at-grade junctions, such as crossroads and T-junctions, so it is questionable if PICADY is an appropriated tool for modelling this junction. For example, National Highways were required to build a VISSIM microsimulation model for the Buckden Roundabout for the A428 Black Cat to Caxton Gibbet DCO Examination.

Also, the PICADY module has been updated and is now Junctions 11 TRL Software Package.

East Park Energy Solar Project

DCO Application 010141

Submission by Phil Wayles on the Applicant's Updated Outline Construction Traffic Management Plan (oTCMP)

Para 2.2.4 Updated to add "*National Highways will also have a role in ensuring that the CTMP is not breached and that safety at the junction between the A1 and B645 is not compromised with, for example, queuing back onto the A1 mainline*." Important to include National Highways (NH) as a relevant highway authority, but we need to bring to NH (and Cambridgeshire County Council, CCC) attention the requirement to consider the capacity and safety impact of U turning HGV construction traffic at the Wyboston junction, Little Paxton junction and/or Buckden roundabout, as well as the A1/B645 junction.

Para 4.5.3 references the Outline Construction Workers Travel Plan (oCWTP) that has been prepared and is included at Appendix B. Comments on the oCWTP are provided below.

Para 5.1.1 adds "*To minimise the impact of construction traffic and prevent HGVs from routing through the populated area of Eaton Ford, all construction HGVs will be directed to access the B645 from the A1 using the northbound exit slip, and to access the A1 using the northbound entry slip when departing the Site*." NH must consider the traffic impact at A428B1428 Wyboston roundabout junction (to the south), A1 Little Paxton junction and A1Buckden roundabout (to the north) for U turning HGV construction traffic – a necessary traffic movement as a result of this change in response to a request from CCC. It is also worth noting the A1 southbound merge at Little Paxton is sub-standard, it is actually marked as a Give Way, so has further safety implications for HGV traffic joining the A1 having given way to traffic on the A1.

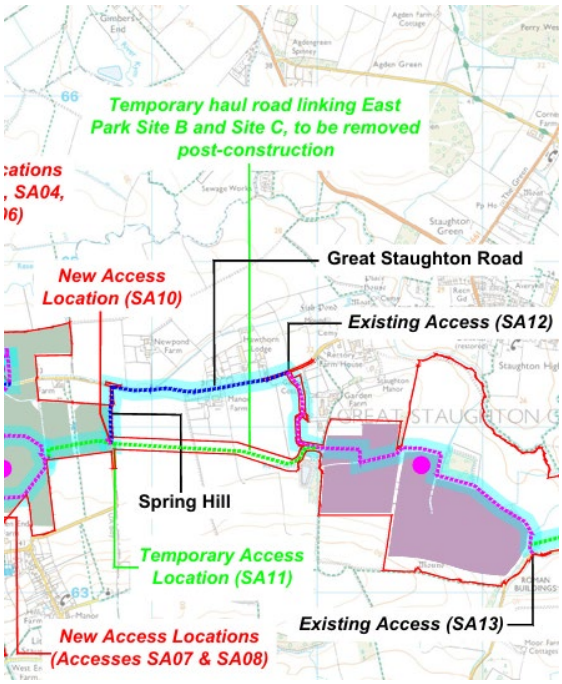
Reference to the traffic modelling for the A428 Black Cat to Caxton Gibbet scheme DCO Examination is an important point of reference. For example, NH was required to produce a VISSIM modelling assessment for the A1 Buckden Roundabout and an ARCADY assessment was undertaken for the A428 Wyboston Roundabout. The "**Wyboston and Barford Road Roundabouts Mitigation Note**" prepared by Cambridgeshire County Council for the A428 Black Cat to Caxton Gibbet scheme DCO Examination states "*This work showed that both Wyboston and Barford Road roundabouts would be over capacity in 2040 with the introduction of the proposed A428 Black Cat to Caxton Gibbet scheme*." Importantly the construction traffic impacts on CCC submission are applicable and relevant for the operational replacement work and decommissioning works. This reinforces the need to model the impact on the Wyboston Roundabout junction.

Here is a link to the CCC A428 DCO submission: https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR010044-001955-CLA-D10-TN-Technical-Note-on-Wyboston-and-Barford-Road-Roundabouts-8274-9.pdf

Para 5.1.11 states "*Site B also has a number of site access junctions which require construction traffic to use short sections of the public highway along Great Staughton Road (SA03, SA04, SA05, SA06) and Green End (SA09)*." Also with reference to Para 5.2.1.and 5.2.2, the Applicant's traffic-flow diagrams appear to assign only minimal construction vehicle movements to the SA03–SA06 Great Staughton Road accesses and SA09 at Green End, despite those accesses serving substantial areas of Site B proposed for solar panel development and two of the satellite compounds. The Indicative Site Access Drawings in Appendix D also include swept path tracking diagrams for these accesses. The application does not transparently explain how the

site areas accessed by SA03, SA04,SA06 and SA09 can be constructed with such limited access movements especially as road widening is required at some locations. This creates uncertainty as to whether the traffic assessment materially understates localised construction activity on Great Staughton Road and Green End Road. The satellite compound near Green End should be accessed by and internal haul road, rather than by public highway and site access SA09. This emphasises the oCTMP does not explicitly and clearly set out which existing roads will be used by construction traffic, nor does not show comprehensive details for as requested by the Local highways Authorities and several IPs. A Construction Traffic Permitted Routes / Restricted routes must be prepared for the whole area bounded by the A1, A14, Bedford to the south and B660 / Swineshead Road to the west.

Para 5.1.13 has been updated to "*Minor road widening works will also be required along Spring Hill Road, and potentially Great Staughton Road, to facilitate the two-way movement of HGVs between access SA12 and access SA10 during the construction phase*." As described at the ISH, this requires HGV construction traffic to travel on sections of Great Staughton Road and Spring Hill Road between these 2 accesses (SA10 and SA12) rather than use an internal haul road between Sites B and C. The change to use a section of the public highway was introduced in the Stat Con documentation, although difficult to interpret. At Non-Stat Con, the Applicant intended to use the internal cabling corridor for temporary construction access (haul road). It is illogical and inappropriate to use and widen the existing public highway when a perfectly sensible alternative exists using an internal haul road to be built along the cable route between Sites B and C as shown on Figure 15 - Proposed Construction Access Strategy in Appendix C (see extract below). This plan indicates there is a temporary haul road along the cabling corridor route which is due to be removed post- construction. Mandating use of this section of temporary haul road would improve safety and limit damage to the existing roads by keeping large and heavy site vehicles off the public highway. Furthermore, there would be further disruption to traffic during the construction of the widening works, and this section of the public highway would be also used during the operational replacement works and decommissioning works. This disruption also applies to the road widening works required at several of the new proposed site accesses to accommodate the HGV swept path tracking shown on the Indicative Site Access Drawings.



This Construction Access Strategy also ignores the potential implications of construction traffic during the operational replacement works and decommissioning works.

There a several changes in the OCTMP relating to site accesses and visibility splays / standards:

Para 5.1.14 adds "*As mentioned earlier, indicative Site Access designs for each of the accesses described above, including visibility splays and swept path analysis of the largest vehicles that are anticipated to use each access, are shown on Figure 1 to 14 at Appendix D of this outline Construction Traffic Management Plan [EN010141/DR/7.4]." and*

Para 5.2.1 states "*Where access is proposed via an existing field gate, a standard bell mouth design will be created in these locations where gateways are too narrow. Design improvements to widen the access to accommodate construction vehicles and an appropriate visibility splay would be made if necessary. These designs will be agreed with the local highway authorities*." and Para 5.2.2 states "*This applies to accesses SA02, SA03, SA04, SA05, SA07, SA09 and SA10."*

Para 5.2.3 adds "*On the Figures in Appendix D, visibility splays have been indicated for both the observed / posted traffic speeds, as well as the reduced temporary speed limits that will be in place at or close to accesses SA01, SA02, SA03, SA04, SA05, SA06, SA07, SA08, SA09, SA10, SA11, SA14, SA15, SA17, SA18, SA19 & SA20*."

Para 5.3.3 adds" *As indicated earlier, reduced visibility splay requirements will be possible at those site accesses where temporary speed limit reductions will be imposed*."

Para 5.4.2 is changed to "*Visibility splays at each of the proposed new permanent Site accesses, including those accesses which will comprise the upgrade of an existing field access, have been determined based on the guidance and standards set out in the DMRB. For completeness, visibility splays based on the observed traffic speeds / posted speed limits, as well as the temporary reduced speed limits, are shown on Figures 1 to 14 in Appendix D.*" and

Para 5.4.3 is changed to "*The majority of the proposed temporary access points – specifically accesses SA14, SA15, SA17, SA18 and SA19 – are situated in locations where it is not possible to achieve a full DMRB-compliant visibility splay in one or both directions It is proposed that speed restrictions and traffic management measures will be implemented to manage the safe movement of construction traffic at these junctions, as described below*."

The location of site accesses and associated visibility splay is a concern for BBC as set out in their LIR at Section 6.5 (Matter 8 – vegetation clearance), Section 9.2 (Matter 20 – Hedgerow Regulations and Inclosure Act), Section 9.5 (Matter 22 – visibility splays), Section 9.39 (Matter 37 - BNG), Section 11.14 (Matter 47 – LIR, construction phase), Section 11.17 (Matter 50 - visibility splays), Section 11.24 (Matter 53 – vehicle tracking) and Section 11.27 (Matter 56 – DCO Agreement: Highways). The impacts of hedgerow removal for construction and required visibility splays at some accesses and crossing points and results in greater loss of hedgerow and habitat removal than stated and assessed by the Applicant in the ES. BBC want to see that the worst-case scenario tested (Matter 22 c) ii.)

A new section - Section 5.8 – has been added relating to "*Highway Condition Survey". Para 5.8.1 states "A pre-construction highway condition survey will be undertaken on the local highway network prior to commencement of the construction phase. The extent of the survey will be agreed with the Local Highway Authorities prior to commencement*." Many roads are already in a poor condition and unsuitable for HGVs indeed Cambridgeshire County Council has imposed 18T weight restrictions for the whole of their area to the west of the A1 as shown their Cambridgeshire Advisory Freight Map. The highway condition surveys must also be undertaken

before and after the operational phase replacement works and decommissioning works. This is confirmed by both Local Highway Authorities in their Local Impact Reports (LIR) [BBC LIR at Section 11.3 (Matter 46) and CCC LIR at Paras 2.5.36 and 2.5.43].

Further to Section 5.8.5, mud on the road is a safety hazard and a road sweeper vehicle must be on site all the times to clear mud off the road promptly after being left by construction vehicles.

Requirements for these condition surveys must be agreed with the local highway authorities and secured as a condition in the DCO.

Construction of the internal tracks must be suitable for all types and movement of HGV construction traffic.

Para 6.1.4 adds "*Delivery vehicles will also be allocated an anticipated departure window, based on expected on-Site turnaround times*." and Para 6.1.4 adds "*Only vehicles with a confirmed time slot allocation will be permitted to attend the Site.*" It is unclear how this will be monitored, managed and enforced, and secured in the DCO.

Para 9.1.3 had been added "*At the time of writing, investigations are ongoing into the feasibility and potential to introduce an automatic number plate recognition (ANPR) system or a GPS-based geofencing system to help monitor and enforce the prescribed HGV delivery routes. If feasible, this will be developed further as part of future updates to this oCTMP or the final CTMP*." This requirement must be secured though the DCO. NH has been added as a key stakeholder in Section 9.3 "Enforcement and Corrective Measures". The Local Highways Authorities have requested a monitoring fee in their LIRs.

Appendix B: Outline Construction Workers Travel Plan (oCWTP) has been added. Most of the detail

The working hours are set out at Para 3.1.2. These timings for construction activities must include the "warming up" period for construction plant to avoid excessive and unacceptable noise early in morning before 0800, for example relating the satellite compounds at Green End in Little Staughton and near The Kangaroo.

The Applicant sets a target for car occupancy of 2 workers per vehicle at Section 6.1. National Highways stated in their Relevant Representation at Section 4.3.4 "...*the Applicant is assuming a car/van occupancy of 2. It is noted that this is a high car share assumption and that a figure of 1.4 has been commonly used as the basis for travel planning on several recent consented and live DCOs for energy projects in rural locations. A car share assumption of 1.4 would result in a significant increase in the number of vehicles accessing the site, predominantly via the A1 junction with the B645*". [redacted] from National Highways restated this important comment at the ISH. This significant increase in the number of vehicles transporting workers to and from the site each day, including Saturdays, is concerning because of the additional noise and disruption.

Despite the Applicant setting details for site accessibility and promoting active travel, there are no guarantees that site workers are going to use the public bus service nor walk or cycle to work. Nor is this secured or mandated in the oCWTP.

Appendix C: Proposed Construction Access Strategy has been added. This does not show comprehensive details for permitted routes / restricted routes for construction traffic – as requested by the Local highways Authorities and many IP's. As confirmed by [redacted] on behalf of Bedford Borough Council at the ISH, detailed permitted routes and restricted routes

plans for construction vehicles should be produced and agreed with the local highways authorities. This is a standard requirement for NSIP schemes. The permitted and restricted routes requirements must be monitored and enforced and align with the Design Approach Document which identifies constraints at Section 4.2.55 "*Access to the Site avoiding narrow routes through villages of Great Staughton, Little Staughton, Keysoe, Pertenhall and Swineshead*."

Appendix D: Indicative Site Access Arrangement Drawings has been added. These show geometric design parameters for each access and crossing. Visibility splays and swept path tracking for rigid and articulated HGVs. The access / crossing designs, existing carriageway widths and fencelines are based on OS Mastermap data. The design should be based on topographical survey data, so the design details are based on accurate road location / width, roadside drainage features, road furniture such as traffic signs, trees and hedgerow position and width. These drawings therefore do not accurately show the extent of works and greater lengths of road widening and hedgerow trimming/removal to achieve the necessary visibility splays. The latter point was raised by the local highway authorities such as BBC in their LIR at Section 11.17 a) iii. The extent of hedgerow removal is already understated in the environmental assessment and impacts of the BNG calculation. Additionally, and as set out above, Sections 5.4.2 and 5.4.3 say the visibility splays at each proposed access are Design Manual for Roads and Bridges (DMRB) compliant. This requirement was requested by BBC at Section 11.17 (Matter 50) and this section highlighted that DMRB visibility splay standards were more onerous than those using Manual for Streets (MfS) criteria. However, some plans in Appendix D still show visibility splays including for Accesses SA14, SA15, SA17, SA18, SA19 and SA20 designed to MfS standards. This potentially makes the access less safe and would require greater lengths of hedgerow removal or trimming.

The very fact that some roads need widening (including to construct several site accesses) proves this local road network is unsuitable for the intended construction vehicles. Also, details are not provided for the traffic management arrangements and traffic diversion routes during construction (including to build the accesses and widen roads).