

10 July 2026

East Park Energy construction traffic evidence submission: construction material and delivery traffic reconciliation, omitted traffic categories and wider transport issues

Submission: For the attention of the Examining Authority, National Highways, Bedford Borough Council, Cambridgeshire County Council and Huntingdonshire District Council

cc: Richard Fuller MP, Ben Obese-Jecty MP

Stop East Park Energy (SEPE) is an independent, community-led group established in response to concerns over the proposed East Park Energy development. The group operates on an unfunded, voluntary basis and has over 1,000 registered supporters. SEPE includes individuals with professional expertise in agriculture, analysis, civil engineering, construction, ecology and environmental science, energy, finance, law and planning, as well as professional experience with the NSIP process.

• Submission contributions and review by a Chartered civil engineer whose professional experience includes traffic, transport and construction matters associated with DCOs for highway schemes

This submission:

1. Presents a sample analysis suggesting that the Applicant's published construction material quantities may not be accurately reconciled with its published construction traffic assumptions.
2. Identifies potential omissions in the Applicant's construction traffic calculations and raises concerns over the completeness of the assessment.
3. Highlights wider issues relating to worker travel and internal inconsistencies in the Application, replacement and decommissioning traffic, highway safety, traffic management and the operation of the local road network.
4. Submits that these issues warrant further scrutiny as they may affect the assessment of transport impacts, greenhouse gas emissions and the conclusions of the Environmental Statement.

1. Introduction: Construction traffic reconciliation, delivery categories and wider transport issues

SEPE opens its submission with an evidence-based analysis indicating that the Applicant's stated construction material quantities and delivery traffic calculations may not be accurately reconciled.

The sample reconciliation exercise set out in this submission provides a test of whether the Applicant's published construction material quantities can be reconciled with its published construction traffic assumptions. It suggests that either the material quantities, the traffic assumptions, or the relationship between the two, has not been transparently explained and assessed. Accordingly, the published information does not presently enable the construction materials and construction traffic assessments to be independently reconciled. In the absence of that reconciliation, it is not possible to independently verify the robustness of either the construction materials assessment or the construction traffic assessment.

SEPE's broader review of construction activities and related traffic categories suggests apparent omissions. Additionally, SEPE submits that a number of other aspects of the Applicant's transport assessment require further scrutiny, including traffic management during the replacement and decommissioning phases, highway safety and the management of the local road network. SEPE's Deadline 4 submission in response to the Applicant's Replacement Works Technical Note sets out replacement phase concerns in more detail.

2. Sample analysis of construction materials and delivery movements

2.1 Reconciliation exercise using Applicant's published data

At the start of the Examination, SEPE undertook a high-level reconciliation of a single significant category of construction HGV traffic (aggregates deliveries) in order to test whether the Applicant's stated material quantities appeared consistent with its stated construction traffic assumptions. SEPE set out its sample analysis at Deadline 1 (REP1-156, 7 April) and at Deadline 3 (REP3-108, 26 May). The Applicant did not directly address the SEPE analysis when first presented; SEPE awaits a response to its Deadline 3 submission.

SEPE notes that the Applicant's stated details originally used to carry out this sample analysis have not been updated in the Application and therefore cites the most recent versions of the relevant Examination documents below.

The Applicant's 'Environmental Statement Volume 2 – Technical Appendices, Appendix 15-1: Greenhouse Gas Emissions Assessment' (REP2-021), Table 4, 'Equipment and materials required to construct the Scheme', identifies that construction of the Scheme will require 60,000 m³ of aggregates.

Using the following inputs:

- Aggregate volume: 60,000 m³ (Applicant's stated quantity)
- Representative bulk density: approximately 1.6 t/m³ (the Applicant does not specify the precise numerical density adopted to convert volume to weight)
- Delivery vehicle: 30-tonne tipper (Applicant confirmed in REP2-045) with a representative payload of approximately 20 tonnes

The implied transport requirement is:

- Aggregates mass: 60,000 m³ × 1.6 t/m³ = 96,000 tonnes
- One-way HGV loads: 96,000 ÷ 20 = 4,800 loads
- Two-way HGV movements: 4,800 × 2 = 9,600 two-way movements

Reasonable variations in the assumed bulk density and representative payload adopted for a 30-tonne tipper would not materially alter the overall conclusion.

2.1.2 The Applicant's construction traffic calculations

In 'Environmental Statement Volume 1 – Main Report, Chapter 9: Traffic and Transport' (REP3-027), paragraph 9.8.7, the Applicant states:

"It is anticipated that the total number of one-way delivery trips requiring access to the Scheme would be approximately 6,068 across the full 30-month construction period (12,136 two-way movements). The majority of these trips (5,278) would comprise HGV deliveries. The trips associated with welfare provision, fuel and waste (790) are anticipated to involve deliveries by light goods vehicle."

The Applicant's 'Environmental Statement Volume 1 – Main Report, Chapter 9: Traffic and Transport' (REP3-027), Table 9.14, and 'Environmental Statement Volume 2 – Technical Appendices, Appendix 9-1: Transport Assessment' (REP3-042), Table 5.1, identify a total 1,537 one-way 30-tonne tipper movements (3,074 two-way movements) for the full construction programme.

The Applicant identifies a number of additional significant HGV delivery streams which should be accommodated within the same construction traffic totals, including:

- PV modules;
- PV frames;
- cabling and ducting;
- BESS containers and electrical plant;
- transformers and substation components;
- concrete deliveries;
- fencing and security infrastructure;
- waste and spoil movements; and
- construction support logistics.

2.2 Sample analysis suggests a potential materials and delivery reconciliation issue within the Application

As set out above, SEPE calculations using the Applicant's stated aggregates requirement suggests that aggregates deliveries would amount to 9,600 two-way movements:

- three times the total stated two-way 30-tonne tipper movements of 3,074
- 90% of the Applicant's entire HGV calculation of 10,556 two-way movements
- 79% of its total two-way construction traffic movement calculation of 12,136

This would leave only a relatively small residual allowance within the Applicant's overall construction traffic totals to accommodate the numerous additional HGV delivery streams identified elsewhere in the Application.

SEPE therefore considers that there appears to be an inconsistency between the Applicant's published aggregates quantities and construction traffic assumptions. This may arise from differences in assumptions, methodology, or how the published figures relate to one another, but the basis for reconciliation has not been transparently explained. In the absence of such an explanation, the published figures cannot be independently reconciled. This gives rise to uncertainty regarding the transparency and reliability of the construction inputs used across the Application.

2.3 Presentation of construction traffic calculations

SEPE also notes that the 'Applicant Response to Stop East Park Energy' (REP2-045) appears to contain an apparent transcription or typographical error in a key figure when outlining traffic calculations. On page 53, footnote 6, it reads:

“2409 total one-way 30t tipper deliveries in month 2, as per TA Annex D, divided by 22 working days per month = 19 HGV deliveries per day or 38 two-way movements, included in total month 2 HGV movements assessed in ES Chapter 9 Table 9.16”

While this particular example may be minor in isolation, it nevertheless highlights the importance of presenting construction traffic calculations in an internally consistent manner. Where calculations underpin the assessment of environmental effects, even seemingly minor errors make it more difficult for Interested Parties and the Examining Authority to verify the Applicant’s methodology and conclusions. This example reinforces SEPE’s broader concern regarding the transparency and traceability of the construction traffic calculations relied on throughout the Examination.

3. Potential omission of construction traffic categories

SEPE’s wider review of the construction phase of the project suggests that the Applicant may have omitted categories of HGV deliveries in its projections that would add to the overall number during the construction phase and therefore traffic impacts have been underestimated. These additional HGV movements include but are not limited to:

- **Delivery of the construction plant and vehicles to site.** Such deliveries are typically made on low loaders. Deliveries include the compound buildings and welfare facilities, and standard vehicles, including articulated lorries, low loaders, tippers, mobile cranes (40t), tankers, excavators, telehandlers, rollers and cable pullers (see ‘Outline Decommissioning Environmental Management Plan’ (REP3-054)). Delivery trips are doubled with taking plant and vehicles off site at the end of the phase. **Note:** delivery of construction plant to site applies to construction, replacement and decommissioning phases.
- **Pavement materials for car parks.** It is assumed that all the car parking areas at the main and 11 satellite compounds would be constructed using bituminous materials to provide a suitable surface for all vehicles and to avoid mud being deposited on the access tracks and local roads. Large areas of car parking are required to meet the requirements set out in paragraph 4.4.2 of the ‘Outline Construction Traffic Management Plan’ (REP3-050):

“it is estimated that there would be a requirement for a provision of parking for up to 350 vehicles within the main site compound in Site D, as well as parking for up to 50 vehicles within Sites A, B and C.”

350-space and 50-space surface car parks would typically require a total site area of roughly 10,000 to 12,000 m² (1.0 to 1.2 hectares) or about 2.5 to 3.0 acres. This includes the areas for standard vehicle bays, manoeuvring aisles and access roads.

The HGV trips required to deliver any bituminous materials appear to have been omitted from the Applicant's construction traffic trip generation calculations. Similarly, any trips to deliver/remove all associated construction plant to lay and compact the road pavement layers of the car parks also appear to have been omitted.

- **Delivery of trees and shrubs for the landscaping works.** For an estimated 132,000 plants calculated using data in Tables 5.5 and 5.8 in 'Environmental Statement Chapter 5 Landscape and Visual' (APP-041), SEPE suggests would require up to approximately 80 HGV deliveries equating to an estimated additional 160 two-way trips, based on the following assumptions:
 - For mixed construction–landscape schemes, an HGV (44t GVW, 13.6m trailer) typically carries:
 - up to ~1 500 × 10 L shrubs, or
 - ~400–500 semi-mature 30–45 L trees, or
 - ~100–120 extra-heavy standards (100 L+ root-balls), subject to securing and height limits.
(Tree weights and dimension information and data from Hilliers, a well-known supplier of landscaping planting for the construction industry)
- **Delivery of fuel for construction plant/vehicles.** The 'Outline Construction Environmental Management Plan' (REP3-048) confirms that fuel tankers are required for refuelling the construction plant and these trips are included in the LGV number of loads included in the 'Environmental Statement Appendix 9-1 Transport Assessment' (REP3-043). Most construction plant will require refuelling every day and significant quantities of fuel will be required during the construction phase (in addition to the replacement and decommissioning phases) to fulfil this demand, and on-site bulk fuel storage tanks will be used. However, SEPE suggests that fuel delivery HGV vehicles are not included in the construction traffic trip generation forecasts.

In addition, it is essential that the mitigation measures set out in the oCEMP are implemented for the delivery, storage, greasing and re-fuelling operations to avoid pollution incidents for the protection of surface water, groundwater and all watercourses.

Furthermore, it is unclear whether the Applicant's construction traffic calculations have taken into account:

- **Vehicles and plant movements associated with removal of some sections of the internal haul roads post-construction.** Under plans set out in Figure 15 'Proposed Construction Access Strategy' in Appendix C of the 'Outline Construction Traffic Management Plan' (REP3-050), SEPE calculates that up to 8.2km of tracks may be removed between:
 - Sites B and C,
 - Sites C and D, and
 - Site D and the Eaton Socon substation.

Accordingly, SEPE suggests that additional HGV trips would result on sections of Great Staughton Road, Spring Hill, B645 to the east of Great Staughton village and Moor Road during the replacement works and the decommissioning phase due to the removal of these sections of the internal haul road post-construction.

SEPE notes that more HGV trips would be generated if the removed sections of the internal haul roads were reconstructed for the replacement works and the decommissioning phase.

See overview of related issues in section 5.4.

SEPE additionally suggests that while Abnormal Indivisible Load (AIL) movements are not high in number, there is significant potential impact during these movements and associated preparatory enabling works.

4. Construction materials and construction traffic projections: reconciliation, category omissions and implications for the Scheme and community

In summary, SEPE submits the following:

- based on SEPE's sample analysis of a single significant construction material and delivery category, the Applicant's stated construction materials and construction vehicle movements may not be fully reconciled, giving rise to uncertainty over the transparency and reliability of the construction inputs used across the Application; and
- additional construction traffic categories may not have been accounted for.

Collectively, the apparent unreconciled differences and potential omissions identified in this submission could lead to understated impacts, affecting the:

- assessment of construction traffic and congestion on the strategic and rural road network;
- daily and peak traffic assumptions;
- road safety and community disruption;
- construction logistics and traffic management measures;
- lifecycle carbon assessment; and
- the overall conclusions of the Environmental Statement.

5. Key traffic and transportation issues

SEPE has raised concerns in previous submissions, including at Deadline 2 (REP2-100) and Deadline 3 (REP3-108). These, and further issues, are set out below.

5.1 Construction worker numbers and internal inconsistencies in the Applicant's transport strategy

SEPE identifies four related concerns regarding the Applicant's assessment of construction worker traffic:

- the exceptionally large and sustained construction workforce;
- reliance on behavioural assumptions regarding car sharing and minibus use;
- apparent internal inconsistencies between those assumptions and other elements of the Applicant's transport strategy, including extensive on-site parking and measures that merely 'encourage' participation; and
- the resulting risk that construction worker vehicle movements, and therefore traffic impacts, have been underestimated.

Rather than a 'temporary peak', the Scheme involves sustained high workforce numbers over an 18-month period, as set out in the 'Outline Construction Traffic Management Plan' (REP3-050), paragraph 4.2.8:

"The number of construction staff requiring access to the Site per day would be greatest between months 7 and 24 of the construction period. During this 18-month period there would be a requirement for approximately 700 staff per day, on average. This would peak in month 12 when a total of 854 staff per day would be required."

Paragraph 4.2.9 states:

“... measures would be implemented to encourage construction staff to participate in a car share thereby reducing the number of trips to the Site. Accordingly, assuming an average car/van occupancy of 1.4, this would equate to approximately 1,000 daily two-way staff trips (500 arrivals and 500 departures) during the 18-month period of peak activity, peaking at 1,220 two-way trips (610 arrivals and 610 departures) during the peak of construction activity in month 12.”

Even on the Applicant’s own assumptions, this represents “approximately 1,000 daily two-way staff trips ... during the 18-month period of peak activity” on a constrained rural road network. However, SEPE is concerned that the Applicant’s assessment of those movements relies on transport mitigation measures that are not only unsecured but internally inconsistent.

The Applicant states only that construction staff would be ‘encouraged’ to participate in car sharing, yet its traffic assessment assumes a specific average vehicle occupancy of 1.4 persons per vehicle. No mechanism has been identified to require or secure that level of participation, and the assessment therefore relies on voluntary behavioural change rather than enforceable mitigation.

Notwithstanding this reliance on voluntary car sharing, paragraph 4.4.2 states that parking provision would allow for up to 500 vehicles at the designated construction compounds:

“it is estimated that there would be a requirement for a provision of parking for up to 350 vehicles within the main site compound in Site D, as well as parking for up to 50 vehicles within Sites A, B and C.”

The Applicant also proposes a staff minibus service. According to paragraph 4.5.6:

“In addition, the number of staff vehicle trips will be further reduced by extending the staff minibus service to provide a collection / drop-off service, to transport staff to the main construction compound from pre-arranged collection / drop-off locations, which would include nearby public transport hubs, town centres, and/or local accommodation.”

At paragraph 4.5.7 the Applicant further elaborates on its fleet of minibuses, which would use the construction vehicle access routes:

“Assuming the use of 15-seat minibuses, if used to transport 50% of the peak workforce a total of 29 minibuses would be required, if full. This would in turn reduce the overall number of construction staff trips during the peak period of construction activity by approximately 50%, compared to the forecast trip generation based on car sharing alone.”

SEPE considers these elements of the Applicant’s transport strategy to be difficult to reconcile. On the one hand, the Applicant’s assessment assumes substantial reductions in private vehicle movements through voluntary car sharing, and suggests further reductions by transporting up to 50% of the workforce by minibus. On the other hand, it proposes parking provision for up to 500 vehicles across the construction compounds – sufficient to accommodate the vast majority of the private vehicle arrivals anticipated during the peak construction period – while identifying only measures to “encourage” rather than require participation in either shared transport measure. Moreover, paragraph 4.4.3 confirms that:

“there is sufficient space within the compound in Site D to provide overspill parking for the full peak construction workforce, if required.”

This indicates that the Applicant has recognised the possibility that substantially more construction workers may travel directly to the site by private vehicle than assumed in its transport assessment, by making provision for parking to accommodate that outcome. The Applicant therefore appears to be planning for extensive private vehicle use while simultaneously assessing construction traffic impacts on the basis that a substantial proportion of workers will instead use shared transport. These elements of the Applicant’s transport strategy are inherently difficult to reconcile. In the absence of restrictions on parking availability or other enforceable measures, there is no evident incentive for construction workers to car-share or drive to remote collection points or public transport hubs at specified times rather than drive directly to the site, particularly where parking is readily available at the compounds themselves.

The Applicant identifies a catchment of up to 50km for the proposed minibus service. SEPE considers it inherently unlikely that construction workers travelling from across such a wide area would choose to drive to intermediate collection points for onward travel by minibus when they could instead drive directly to the construction compounds. Consequently, there is a real risk that substantially more workers will travel directly by private vehicle than has been assumed by the Applicant, increasing traffic through surrounding villages.

Taken together, the Applicant’s assessment relies on mitigation measures that are neither demonstrated to be effective, secured through enforceable mechanisms, nor

consistent with other elements of its own construction transport strategy. As a result, there is a significant risk that construction worker vehicle movements have been underestimated, with the consequence that traffic impacts on the surrounding rural road network and nearby villages may be materially greater than those assessed by the Applicant.

5.2 High potential for traffic capacity and queuing implications at key junctions

SEPE submits that significant concerns remain regarding the lack of sufficient assessment of U-turning HGV construction traffic at the Little Paxton Junction and/or A1 Buckden Roundabout north of the A1/B645 junction, and the A1/A428 Wyboston Junction and/or Black Cat Junction south of the A1/B645 junction.

SEPE also raises concerns about the potential impacts on sensitive receptors and residents along the Great North Road in Little Paxton and Buckden village affected by U-turning HGV traffic. Cambridgeshire County Council has already raised similar concerns about the impact on local residents on a section of the Great North Road in St Neots at the A1/B645 junction which resulted in the change to require construction traffic to only use the A1 northbound carriageway to access the B645 and Site D. SEPE notes that Cambridgeshire County Council raised similar concerns regarding traffic queues and delays at the A1/A428/B1428 Wyboston Roundabout Junction during the DCO Examination of the A428 Black Cat to Caxton Gibbet project.

5.3 Omission in fatality data

SEPE has already identified (REP3-108) that fatalities recorded at the Moor Road junction and the A1/B645 junction over the Applicant's five-year assessment period were included in Image 3.3 of the 'Environmental Statement Volume 2 – Technical Appendices Appendix 9-1: Transport Assessment' (REP3-042) but excluded from the same document's Table 3.2.

These omissions and the inclusion of atypical pandemic- and post-pandemic period traffic conditions without obvious qualification misrepresent the recent safety record and may affect the reliability of the collision analysis and the conclusions drawn regarding baseline road safety.

SEPE repeats the concern that one of the three fatalities occurred at Pigg's Hill on the B645. This fatal injury accident involved a collision between a car and an HGV. This section of the B645 would form the principal construction traffic route to Site D.

5.4 Removal of sections of internal haul road network post construction and ambiguity over plans for replacement and decommissioning phases

SEPE submits that the planned removal of internal haul roads after construction, as set out in Figure 15, Appendix C of the 'Outline Construction Traffic Management Plan' (REP3-050), could increase traffic on the public highway during replacement works and decommissioning stages if the internal road network is not reinstated.

There is neither a clear commitment nor proposal to reinstate the internal haul roads for the decommissioning phase. In the 'Outline Decommissioning Environmental Management Plan' (REP3-054), paragraph 2.5.1 states:

"It is anticipated that access during the decommissioning phase will follow the same principles as in the construction phase, and therefore the mitigation measures set out in the outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4] would also apply to the decommissioning phase."

Paragraph 2.5.3 states:

"The decommissioning traffic route will mirror the construction phase strategy, using an internal temporary access road to connect sites and minimise use of public highways, specifically avoiding Moor Road and Great Staughton village."

Further to concerns set out in section 3, SEPE submits that, without a clear commitment to reinstate the internal haul road network, there is no assurance that decommissioning traffic will be able to follow the same strategy as construction. This could lead to increased HGV movements through villages, greater community disruption, safety risks, and additional damage to local roads during the decommissioning phase. The reinstatement and interconnectivity of the internal haul road network should therefore be secured through the DCO.

5.4.1 Replacement and decommissioning works

SEPE submits that the replacement and decommissioning phases require greater scrutiny of traffic movements, including HGVs, LGVs and site commuter vehicles, to ensure that their impacts on the local highway network are properly assessed and mitigated.

SEPE's Deadline 4 submission in response to the Applicant's Technical Note on Replacement Works (REP3-075) sets out further concerns.

5.5 Cumulative traffic effects of concurrent construction works

The ‘Environmental Statement Chapter 17 Cumulative and In-Combination Effects’ (APP-053) states that the potential for traffic and transport effects of five energy and infrastructure projects were considered in the cumulative assessment. However, the Applicant considers that a detailed assessment for the following projects was not required for the following reasons:

- Cobholden Solar Farm and BESS – “there would be little to no overlap between the proposed construction access route or the proposed construction period of the Cobholden Solar Farm and BESS sites relative to the Scheme”
- A428 Black Cat to Caxton Gibbet – “Since the highway improvement scheme is intended to provide additional highway capacity and improve journey times along the A1, A421 and A428 in the vicinity of St Neots, it would therefore represent a beneficial change to the assessed baseline position. As such, it is considered that no further detailed consideration of the cumulative impacts of the Black Cat to Caxton Gibbet improvement scheme is required with regard to traffic and transport.”
- East West Rail – “unlikely that any construction activity associated with East West Rail within the study area will occur until after the construction phase of the Scheme has been completed.”

However, SEPE is concerned that the cumulative traffic and transport effects for the construction (including advance preparatory works such as archaeological investigations and ground investigations) and the operational stages of these projects are not considered in the cumulative assessment.

The East West Rail Consultation 2026 brochure¹ includes details on how its programme to deliver the section of the project in this area will be accelerated. SEPE contends that it is important to note that this indicates construction would progress concurrently with the East Park Energy Scheme. The brochure states:

“By 2030

Following entry into service of trains between Oxford and Milton Keynes, we would start construction of a new station at Tempsford, with platforms on the East Coast Main Line, to serve the proposed new town with north-south train links. This would provide connectivity to Tempsford earlier than originally

¹ East West Rail Consultation 2026, A complete guide to all the key information for this consultation: https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/ListsBlockMedia/aaf363cb34/EWR_Consultation-Brochure_V1-v2.2_issued_14Apr26_midres.pdf

planned. EWR platforms would follow in the mid to late 2030s. We would support increased train capacity from the west to Milton Keynes, where Universal plan to run a coach shuttle service to the new resort when it opens.”

“By the early 2030s

We would upgrade and electrify the Marston Vale Line (MVL) meaning we could introduce four trains per hour between Oxford and Stewartby. We would construct four modern, fully accessible stations, including a new station at Stewartby to serve the Universal Entertainment Resort Complex and improve Bletchley station. Accelerating this part of the programme means train services would be starting within the first few years of the park opening, in line with expected increase in demand.”

It is also possible that other major projects such as the new Universal Resort Complex and Tempsford New Town and associated infrastructure could be constructed concurrently with the Scheme and will generate additional construction traffic trips in this area.

Local residents, communities and businesses continue to be adversely affected by the numerous energy, major infrastructure and housing and commercial development projects built or planned in the area.

5.6 Concerns relating to principal Site D construction access

At Deadline 2 (REP2-100), SEPE noted that earlier project documentation indicated a different construction access strategy for Site D and questioned whether the change to the current location, which requires construction traffic to negotiate longer and more problematic stretches of the B645, had been adequately justified from a highway safety perspective.

The Applicant’s response (REP3-074) is explicit that, alongside confirmation of the discovery of the remains of the Roman Town in the target development site, failed negotiation of commercial terms was a reason for this decision:

“The Applicant’s inability to reach commercial terms for the use of the Sharps Barn access.”

“The decision to create a new main construction access was also influenced by the Applicant’s inability to agree acceptable commercial terms on the use of the Sharps Barn access.”

The response confirms that the Applicant's move away from the original Site D access strategy was influenced, at least in part, by its inability to reach acceptable commercial terms for the use of the original Sharps Barn access. This raises a legitimate question as to the extent to which commercial considerations have driven the evolution of the access strategy towards the current Site D entrance, resulting in construction traffic now being routed along a longer section of the B645, including the village of Hail Weston, with its numerous residential access points and road junctions, and through the significantly more constrained sections of the B645, including Pigg's Hill.

SEPE suggests that the Applicant does not adequately explain why the potentially safer earlier option was not pursued or whether highway safety was given sufficient weight alongside commercial considerations.

5.7 Absence of traffic safety and control officer

No Traffic Safety and Control Officer (TSCO) has been proposed for any of the three principal phases. A TSCO would provide a single point of contact and be responsible for planning and implementing traffic control measures, managing traffic incidents, coordinating planned roadworks and local events, and overseeing traffic response and coordination during emergencies such as a fire or explosion.

For NSIPs, appointing a TSCO (or an equivalent role under a different title) is considered good practice where construction traffic presents significant risks. Given the scale of the Scheme, involving multiple construction compounds, several access points, significant HGV movements over an extended construction period, works across two counties and several authorities, and interaction with villages, cyclists, equestrians and public rights of way, SEPE suggests that appointing a dedicated competent person would be entirely reasonable in order to manage construction traffic safely and coordinate compliance with the CTMP.

6. Concluding remarks

- SEPE remains concerned that the Applicant has not demonstrated how its published construction material quantities reconcile with its published construction traffic assumptions, giving rise to uncertainty over the transparency and reliability of the construction inputs used across the Application.
- The apparent omission of construction traffic categories may underestimate the scale of construction traffic and its associated impacts, including greenhouse gas emissions and the conclusions of the Environmental Statement.

- Collectively, SEPE contends that the unresolved issues identified in this submission – including the reconciliation of construction materials and construction traffic, omitted traffic categories, worker travel, replacement and decommissioning traffic, and highway safety and traffic management – are indicative of wider concerns regarding the completeness, consistency and transparency of the Applicant’s transport evidence. Taken together, SEPE submits that they warrant more comprehensive scrutiny and complete resolution during the Examination to ensure that the Scheme’s transport impacts and associated environmental effects are fully understood and properly assessed.