Springwell NSIP

Submission of 7 May 2025 regarding traffic issues

Introduction

This document contains a fuller version of the oral comments made at the hearing on 7 May 2025 regarding concern about construction traffic as:

1. within the study area, there is an underestimate of the A15 road safety risks; and
2. the traffic assessment is flawed because the study area is too narrowly focused.

Both are compounded by the failure to allow for the cumulative traffic effects.

A15 safety risks at junctions

The A15/B1202 (Metheringham Heath Lane) crossroads is near capacity and a steady stream of traffic along the A15 results in drivers on the B1202 becoming inpatient and taking a chance. The applicant's submission (document APP 054: EN010149-000173-6.1 Environmental Statement Volume 1 Chapter 14 - Traffic and Transport.pdf) envisages two scenarios: one is that a workers' shuttle bus service will be implemented to pick up construction workers from designated points in Lincoln and Branston every half hour and the other that improvements are made before construction begins.

I have been unable to find the expected origin of the workforce in the document library (although from references I have seen, such an exercise has been completed) and assess whether it recognises the cumulative effect of other construction work at the same time that is likely to mean the area from which workers will be drawn will be extended. In the absence of this information, it is difficult to establish the likely effectiveness of the proposed commuter bus service - how many workers would live within walking distance of the designated points? If a park and ride is proposed, where in Lincon and Branston are the park and ride compounds? How likely is it that workers would use a park and ride rather than drive directly to the site? The applicant states (APP 141 EN010149/APP/7.8 in page 9 at para 3.2.2) that at the Primary Construction Compounds parking will *be provided for construction workers and onward minibus transport to internal working areas. Parking spaces will be provided for the maximum number of personnel at each Primary Construction Compound applying a ratio of 1.5 workers per vehicle;* this suggests the applicant believes a significant majority of workers will not use the commuter bus.

APP 141, in para 4.1.9 (page 16) refers to worker movements and acknowledges the lack of control over LGV and car movements (e.g. the applicant does not propose any measures to enforce LGV deliveries or commuter LGVs/cars transiting via the prescribed routing strategy) and presumably does not propose measures to enforce use of the shuttle bus. I ask that the EA consider the likely effectiveness of a commuter shuttle bus in reducing commuter traffic through the A15/B1202 (Metheringham Heath Lane) crossroads.

Even accepting the applicant's assumptions on the effectiveness of the shuttle bus, peak time delays shown in table 14.24 (APP 054) can be expected to rise significantly - exacerbating the impatience problem and generating a predictable rise in deaths and injuries. It would be dangerous to allow construction of this development to increase pressure at the A15/B1202 crossroads in advance of improvements.

Elsewhere, construction will increase traffic at the A15 junctions with the two Navenby roads: Green Man Road and Heath Lane. Both have poor accident records and will have additional problems with the extra Springwell traffic at their A15 junctions.

In my opinion, there are aspects of the applicant's assessment that fail to acknowledge safety risk at junctions – for example the A15/Green Man Road T-junction. Table 14.36, on Page 72 of APP 054 referring to the Green Man Road junction, states of *the six collisions that have been reported at this section of the A15, four involved a single vehicle leaving the carriageway on or adjacent to the bend and two involved several vehicles colliding on the bend*. There is not a bend at the junction and this statement is contradicted in the *Environmental Statement Volume 3 Appendix 14.1: Transport Assessment* (APP 123) saying on paragraph 4.3.17 on page 44, in relation to the A15/Green Man Road priority T-junction, of the seven (not six) *collisions that have been reported at this junction, five comprise rear-end shunts, one occurred as a vehicle entered the junction, and one occurred as an emergency vehicle was overtaking*. Classifying the incidents are rear end shunts does not identify the main problem which is vehicles is turning into Green Man Road are not seen until too late by A15 traffic (particularly travelling at 60mph if there is an intermediate vehicle obscuring indicators) resulting in rear end shunts on the A15. The problem is in fact worse as shunts are often only avoided by escaping onto the grass verge and in some cases colliding with the road signs (the evidence for this can be seen by looking at "fix my street" for that junction).

Cumulative effects

It should be noted that it is proposed that Green Man Road should host the Navenby BESS and Heath Lane the proposed NG sub-station.

The applicant considers cumulative effects in EN010149-000175-6.1 Environmental Statement Volume 1 Chapter 16 - Cumulative Effects.pdf (APP 054) and has, incorrectly in my opinion, decided the cumulative assessment should not factor in the traffic from both.

The substation is ignored on the basis, stated in table 16.4 on (page 46 of APP 054), that it is *assumed that appropriate mitigation would be in place for the National Grid Navenby Substation development, as is good practice and standard for schemes of this nature* and *provided there is adequate mitigation for the National Grid Navenby Substation development there should be no interproject cumulative effect". S*uch a stance clearly undermines the purpose of the cumulative assessment exercise.

Paragrapgh 16.7.41 (page 95 of APP 054) says the *justification for excluding the other existing development and/or approved development is included in ES Volume 3, Transport Assessment [EN010149/APP/6.3] Table 6.1* (APP 123). Referring to the Navenby BESS, table 6.1 (on page 59 of APP 123) says *As this is an EIA screening application, and no outline/full application has been made at the time of writing, this development is not considered at this stage*. This is incorrect as it was not a screening application but a scoping one made in 2023 and public consultation was undertaken in November 2024. The traffic impact of the proposed Navenby BESS should not be excluded.

If I understand correctly, the applicant did not approach National Grid to see what other developers had applied for connection to the proposed Navenby sub-station and could reasonably have been considered for inclusion in the cumulative effects. Some potential schemes (e.g. the Brant BESS at Coleby) are sufficiently well advanced to have included traffic proposals in public consultation meetings whereas others (e.g. the Wellingore BESS, 24/0075/EIASCR) may not have gone beyond a screening opinion. Nevertheless, the applicant should consider whether any more of these schemes are sufficiently advanced to factor into cumulative traffic effects.

Study area excludes villages to the west of the A15

The application does not recognise that traffic will join or leave the A15 at points between the B1178 and B1191 and travel through the centres of Harmston or Navenby villages. For example, the shortest route from much of Springwell to the A1/A46 at Newark is not via the Holdingham Roundabout but via Navenby, accessing the A17 at another tricky junction. Navenby gets considerable traffic down Green Man Road, turning left onto the High Street and then turning right down Church Lane. Green Man Road is a long straight road that has an LRSP evidenced problem with speeding LGVs and cars within the 30 mph area. The junctions in the village are not designed for the volume of traffic e.g. inadequate sweep at junctions means long vehicles either damage kerbs or enter the opposite lane risking collision with oncoming traffic. Church Lane is narrow and totally unsuitable for existing HGV traffic which causes conflict with existing LGV and car traffic and the problem would be worsened with Springwell LGV and car traffic. Roads through the centres of both Harmston and Navenby suffer from the current volume of east-west traffic and it is unacceptable that they have been excluded from the traffic assessment. If the EA has not already visited Navenby, the EA may wish to visit informally (i.e. unaccompanied) and see the Green Man Road/ Church Lane cut through in the village.

North Hykeham Relief Road

Paragraph 16.7.45 (on page 96 in APP 054) says c*onstruction of the North Hykeham Relief Road (application reference 24/0374/CCC and 22/1426/EIASCO) is anticipated to be completed at a similar timing to the start of the construction of the Proposed Development*". Paragraph 14.10.11 on page 56 of APP 123 says the North Hykeham Relief Road is also *expected to reduce traffic flows on the A15, improving performance of the junction (*thereby reducing the impact of traffic generated by the Proposed Development). The proposed North Hykeham relief road (a name that understates its scope) will not only reduce A15 junction pressures; it will also reduce the east west traffic through the villages; it is crucial it is built in line with the anticipation. However, whilst a considerable amount of preparatory work has been done (design, planning permission, legal orders etc.), LCC has not yet committed to a start date for construction. The applicant's assumption on timing therefore looks optimistic. Without the relief road, there is likely to be unacceptable pressure on the A15 junctions and on the villages from the east west traffic. The EA is therefore requested to recommend Springwell construction is delayed until after an estimated completion date is known following LCC letting construction contracts.

Conclusion

For the reasons detailed, the application as submitted should not be approved.