

CVSAG deadline 5 submission

The Cliff Villages Solar Action Group (CVSAG) wishes to submit the following comments on construction traffic issues raised up to deadline 4.

First, we agree with the extent of additional projects now scoped in. However, we remain concerned that the widening of scope beyond Springwell alone is still not adequately reflected in the cumulative transport note (appendix 1 to REP4-049) in regard to safety on the A15 between the B1178 and the Heath Lane (Navenby) junction.

A further concern is that the Springwell traffic assessment excluded Navenby (both the village and the A15 junction with Green Man Road). In February 2024, Springwell advised Navenby Parish Council (NPC) that this was because they thought their routing would not have a significant traffic impact on Navenby. The Parish Council was concerned about the cumulative impact (not just looking at Springwell in isolation) and in June 2024, LCC said that they accepted the applicant's position but would keep it under review and consider the cumulative impact of other schemes. It is noted that LCC, in REP4-051, also accept the revised scoping but it is unclear from REP4-051 whether LCC have undertaken the promised review of the exclusion. The ExA is requested to review the LCC deadline 5 submission to seek clarification on this point.

CVSAG has a particular concern about the A15 junction with Green Man Road and the A15 south to Heath Lane. This junction, despite being within the scope of average speed cameras, has a poor and deteriorating record of collisions (as evidenced by publicly available data e.g. crashmap).

The inclusion of National Grid Navenby Sub Station (NGNS) movements, estimated in table 2.2 of appendix 1 as being as being 100 HGVs per day through the Green Man Road junction, are not insignificant. However, the applicant has not felt it appropriate to include the junction within an updated traffic assessment (on the grounds that it was not included previously). The ExA is invited to consider whether the continued exclusion of the junction is acceptable having regard to the additional cumulative traffic now identified (even without including the Navenby BESS traffic).

CVSAG is also concerned that the cumulative traffic assessment does not reflect other safety risks along the A15. For example, the stretch of the A15 between Green Man Road and Heath Lane (Navenby) which also has a poor safety record. This stretch of the A15 will be under added pressure being used simultaneously by Springwell and NGNS traffic (an

estimated NGNS 200 HGVs per day using the A15/ Heath Lane junction). Does the ExA feel that all these risks have been appropriately identified and mitigated?

The applicant has excluded the proposed Navenby BESS on Green Man Road from the scope of the transport note cumulative assessment saying, in paragraph 2.4.2, that the "CTMP acknowledges that the Proposed Development (Springwell) will be complete prior to work commencing on the BESS scheme. As such, there will not be a cumulative construction traffic impact arising between the two projects.". This is accepted but CVSAG is concerned that if there is a delay in completing the Springwell construction there could be an overlap; the ExA is requested to include a requirement to address this eventuality and mitigate the consequences.

LCC plan to improve the B1202/A15 junction and the applicant has proposed measures to mitigate pressure pending substantive improvement. The applicant has proposed a half hourly bus shuttle between Lincoln and Branston and the construction compounds. CVSAG is sceptical as to how many workers will use this (e.g. most workers will not live within walking distance of the service, yet no consideration appears to have been made for parking in Branston or Lincoln; unless the workers are required to use official car parks, and reimbursed for parking, there will be a consequence of inappropriate "free" parking to the detriment of the community. The ExA is requested to consider additional requirements in the DCO to ensure use of the shuttles and avoidance of inappropriate parking.

A further proposed mitigation is the embargo on this junction during peak hours (e.g. a maximum of 5 HGVs per hour). CVSAG is aware that whilst the contractor has direct control over its own vehicles, it has less control over deliveries or contractors. Inclusion in a contract is ineffectual with contractors, and even less when included in their contracts with their suppliers and sub-contractors. The ExA is requested to consider the measures proposed below by CVSAG in this regard.

An effective and proportionate mitigation is a requirement on the developer for improvements to all the junctions about which concerns have been raised, especially the failing B1202/A15, and to widen the narrow roadways leading to the developments. We invite the ExA to include such requirements in the DCO.

Evidence from many locations is that lax enforcement leads to violations (e.g. LCC have put a contractual obligation in the contract for HGVs taking waste to the EFW site at Teal Park to not use the route through Harmston but we see daily incursions by waste lorries). Effective monitoring for breaches is necessary (e.g. it is not appropriate to expect residents to phone

up reporting possible breaches, as was proposed at a Springwell consultation meeting). Continuous manual counting is impractical so the ExA is invited to have a requirement for cameras at the compounds and at the A15/B1202 junction to identify vehicles going through that junction during embargoed time with a robust enforcement process to address breaches of the embargo. We would also ask the ExA to include consequences for failure to comply; we would strongly suggest that the only effective consequences are those that impose tiered financial penalties (ultimately potentially leading to a stop notice).

The applicant has stated that routing for HGVs, LGVs and cars will result in minimal east-west traffic through the cliff villages. Some traffic is unavoidable (e.g. for workers residing in the cliff villages or the Brant area). However, we suspect many vehicles will not follow the prescribed A15 routing and use these villages, principally Navenby and Harmston, as the most direct route to get to the A46 (for Newark, Gainsborough and beyond) or to Leadenham (to access the A17 or the Grantham direction). We have not seen proposals from the applicant that will effectively monitor and enforce the routing. We therefore ask the ExA to consider a robust requirement to enforce routing (e.g. cameras linked to compounds at the entrances to Harmston, Navenby and Leadenham with tiered consequences for failing to comply).

The updated CTMP (REP4-029) has two significant amendments. Paragraph 5.6.3 now makes it clear that cars and LGVs will be subject to the B1202/A15 embargo. A new paragraph 4.1.10 says “LGV routing is available as per HGV routes”. CVSAG believes that merely to point out availability is insufficient and does not reflect our understanding that routing would also apply to LGVs and cars. The ExA is asked to consider including a requirement to control construction transit by cars and LGVs – for example, replacement of the first sentence of 4.1.10 by “Cars and LGVs will also adhere to the routing for all trips involving transit to or from the A17 and A46”. Even with the embargo, such a requirement is appropriate to prevent vehicles using unsuitable minor roads. However, without mandatory routing during the embargo period, it is likely that many cars and LGVs will transit through the cliff villages to avoid the embargo, displacing congestion rather than reducing it. The title of appendix 2 should also be amended to reflect the inclusion of cars.

7.10.25.