

From the opening of the Enquiry, I have been concerned that the applicant's documents demonstrate a lack of understanding of the impact of construction traffic to and from sites. A simple example is that the applicant reports nil personal injury collisions (PIC) on Green Man Road (GMR) which, as a Navenby resident, I know to be incorrect (which I subsequently confirmed from [www.crashmap.co.uk](http://www.crashmap.co.uk) and contact with LRSP). I am not suggesting that the GMR PIC data in itself is significant but rather it is indicative of a wider understatement of the traffic impact.

Due to other time commitments, I have not been able to do a full critique of the traffic assessment but have tried to review a few sample topics, such as the morning peak hour assessment. This has not been easy; I wrote to the applicant on 15th January 2026 and got a reply on 12 March (some eight weeks later). Delay in response by the applicant has made it difficult to challenge assessments that may be relied upon in the statement of common ground with LCC Highways. The applicant implies in Table 13-26 of Chapter 13: Traffic and Transport (APP-038) that no construction traffic associated with the principal site or connection corridor will transit junctions J9/10/11/12 during peak hours - this is not plausible for several reasons and I will cite three.

Paragraph 7.4.11 of the volume 7.18 Framework CTMP says "staff arrivals have been assumed to take place between 07:00- 08:00". I understand that workers will arrive at the Principal site and then be transported to the connection corridor by shuttle bus - most having transferred from personal vehicles or shuttle buses bringing them from surrounding urban centres. The logistics of this mass transfer are not described by the applicant but unless early arrivals are to have long transfer waits, there would be a shuttle bus bring workers to the connection corridor between 7.00 and 8.00.

Second, not everyone visiting the connection corridor will use the shuttle bus. The applicant has not indicated the contractual status of workers (hourly paid employees vs self employed contractors). The latter will typically have their own tools in LGVs and, as time is money, wish to get on site as soon as they arrive in the area. The applicant says their contracts will address timing arrival but unless staggered, there is likely to be a build up of traffic in Navenby. The High Street has very limited parking but has shops that are attractive to passing trade (e.g. a traditional village bakery and newsagent/tobacconist). It already has peak time parking problems (parking in bus stops used by service and several school buses, parking on double yellow lines and blocking residents drives). I understand the applicant is not proposing to ban LGVs from use of Navenby High Street so it seems inevitable to me that between 7.00 and 8.00 there will be not only extra traffic but also problematic LGV parking in Navenby - neither of which is recognised by the applicant in relation to their project let alone the construction traffic from other schemes.

Third, there will be worker traffic (shuttle buses, LGVs and cars) going to the Principal site from Sleaford and areas further east. The distance from the Holdingham roundabout in Sleaford to the Principal site is about 17 miles via the A15 and 50% longer via the A46. It is untenable to suggest that none of this traffic will transit down the A15 through junction 12 (GMR/A15).

Moving on from just the connection corridor, I think the applicant has presented a too optimistic assessment of the volume and timing of traffic. As examples, I cite a few further points on shuttles, as described in 7.4.13 to 7.4.17 of 7.18 Framework CTMP.

Six main urban areas are identified as having shuttle buses. 7.4.14 states "two shuttle services would therefore be required to/from each area. This equates to a total of eight shuttle services in the morning" - why eight rather than twelve - (2 from 6 centres)?

Paragraph 7.4.16.e say that "A shuttle service round-trip (e.g. from the Principal Site to local worker accommodation in Lincoln for example, and then back to the Principal Site) is expected to take around 15-30 minutes on average". The users of the shuttle are stated to be "Non-local Staff staying in Nearby Accommodation". I assume this means centralised accommodation (e.g. hotels) so one collection point is practical, rather than domestic accommodation (e.g. rented housing dispersed through the urban area) as the latter is more likely to involve multiple pick-up points and slower journeys. Looking on google maps on 15 March for car travel on Monday 16 March from a point central to most Lincoln hotels (i.e. the bus station) to the Principal compound at Haddington, a departure at 6.55 will take between 14 and 22 minutes one way and at 7.25 take between 14 and 24 minutes. By bus, it is likely to be slower than car and, allowing for boarding/unloading time, a 15 minute round trip is impossible and 30 minute round trip a very low probability. Travel time to other urban centres will be significantly longer. There are several implications of this including a need for more buses, the inability of buses to multi-trip and less flexibility to accommodate localised peaking (e.g. conflict with school traffic in the six centres).

The restricted shuttle timings are also likely be unattractive to many users. For example, at the beginning and end of the working week, workers are likely to save time by driving straight to/from the compound from their weekend accommodation. The applicant has not indicated any mitigation for this (e.g. by requiring parking permits at sites and granting them only to those permanently living locally).

The matters described above, although minor individually, are just examples of an assessment that understates the overall problem of construction traffic that is, in aggregate, very significant.