

I wish to comment on three aspects: traffic, the temporary nature of the application and socio-economic factors.
Traffic.

Today (31.3.26), I had a very useful informal discussion with the applicant on traffic issues raised in published in the document library upto and including deadline 3A. This section details the areas where I feel further assurance is necessary.

In relation to cumulative impacts, the applicant initial documents were based upon information available at the time. With the passage of time, the applicant now accepts the most likely scenario is that there will be temporal construction overlaps between National Grid Navenby Substation (NGNS), Springwell NSIP and Fosse Green, if all three are approved, and that temporal overlaps with other energy schemes, such as Leoda, are less likely. I would like explicit confirmation from the applicant, that current submissions (including the statement of common ground with Highways) do assume, as a minimum, a temporal construction overlap between National Grid Navenby Substation (NGNS), Springwell NSIP and Fosse Green. On the impact on public transport, I understand that submitted impacts do not discriminate between PSVs and other vehicles. Whilst an assessment of negligible may be appropriate for the impact on vehicles in aggregate, PSVs run to fixed routes and timetables and are qualitatively different to independently driven road vehicles. I understand the applicant has not consulted bus operators, nor is the applicant aware of whether LCC has consulted bus operators. I ask that such consultation with bus operators should be undertaken to ascertain whether the impact is negligible or mitigations would be appropriate.

On peak traffic, I understand that workers work a 12 hour day and arrive at the principal site between 6.00 and 7.00, Shuttles will leave between 7.00 and 8.00. Workers needing to take LGVs to satellite sites will arrive after 9.00. I have two concerns about this. First, the traffic assessments show no peak hour traffic through connection corridor junctions. I suggest that there will be some such traffic for connection corridor workers (e.g. if a shuttle bus worker needed to work with an LGV worker it is not realistic to expect the former to wait over an hour for the latter to arrive). Second, no account has been taken of non-corridor workers transiting to the principal site through the connection corridor junctions (passing along, or crossing, the A15 to get to the principal site from the north, east or south (such as a local worker travelling to the principal site who lives in, say, Ruskington).

Although HGVs are a major concern because of their size and weight, LGVs are of concerns to locals (for example, through speeding in residential areas). I would therefore wish the applicant to articulate why routes are not being specified for LGV traffic.

It is recognised that monitoring divergence from approved routes is challenging. I note LCC Highways are happy with the detail currently in the Framework CTMP. However, in my opinion, it is not possible for contractors to rely upon complaints from the public (e.g. the public won't be able to distinguish between a Fosse Green and Springwell vehicle) and so we need networked ANPR at all contractors' sites and key village fringes. As I understand it, the applicant's view is that this level of detail is more appropriately addressed in a post-approval CTMP; I accept the logic of this (e.g. a detailed plan could factor in the timing of road works, such as the B1202 junction with the A15, and routing plans for other schemes but would wish to see a firm commitment in the framework CTMP to the strongest possible monitoring measures and penalties for contravention.

A further particular concern is that there has been no local input to the CTMP process. One further improvement would be for drafts of any post-approval CTMP to be shared with the community liaison group, at which Parish Councils are represented, and I would ask that this be included in the framework CTMP.

On the GMR/A15 junction, I said the renewables traffic would be the last straw. The applicant responded to Navenby Parish Council in REP3A-025 that signage strategies would mitigate the risk of increased collisions. Consideration needs to be given to further measures (e.g. a ban on HGVs using Green Man Road other than for access, a right turn filter lane, reinstatement of the static speed camera).

The final traffic issue is the DCO power to close streets. I understand from the Teams meeting that the need for closures in the connection corridor on the A607 and B1202 would be identical and would allow traffic to continue in both directions down both roads by use of single lane working. However, the DCO wording differs between the A607 and B1202 and has caused confusion and led to an impression locally that the nature of closure in one will differ from the other. If the need for closure is the same, why is the wording different in the draft DCO (page 55 of REP2-005) for the A607 compared with the B1202 (i.e. what different power is sought in one and not the other).

Temporary nature of the proposal.

There has been much discussion about the temporary nature of this proposal when other developments which could argue they are temporary (e.g. a gas fired power station which has a design life of less than 60 years) are not classed as temporary. A point made by Barry Smith in his deadline 3 submission was "the planning question is not solely whether a development is reversible in principle. It is the weight that should be attributed to its effects during its operational life" (page 10 of REP2-097). I understand that the applicant argues that, as temporary land use, the weight given to the loss of agricultural land should be reduced. This begs the question as to the quantification how much the loss of agricultural land should be discounted as it is temporary rather than permanent. An appropriate basis is described in the Green Book (guidance issued by HM Treasury to government bodies on how to appraise projects). The Green Book recognises social time preferences and the need to allow different profiles of net costs and benefits over time to be compared on a common basis. For example, other things being equal, a permanent harm is worse than one for 60 years which in turn is worse than one for 6 years; similarly a permanent benefit is preferable to a temporary benefit. Applying a social time preference to the loss of agricultural land for 60 years shows an insignificant difference to a permanent loss.

Socio-economic factors.

As far as I can see, no assessment has been made of the annual value of the crops produced by the land that would be taken out of agricultural production under this proposal. I remain concerned that the applicant has understated the cumulative negative effect on the agricultural and tourism economy of Lincolnshire.

Looking at the socio-economic benefits, the applicant has failed to refer to national policy to support UK steel as part of the push for renewables. The tonnage of steel involved in the project is not specified by the applicant, but it will be considerable. As noted by Mrs Overton in Issue Specific Hearing 3 (ISH3) – Part 2 – Session 2 at 44.10, the applicant for the third runway at Heathrow has pledged to use UK steel. The cluster of steel making around the Scunthorpe steel works

is a major employer in Lincolnshire. As far as I can see, there is no ambition from the Applicant to use steel from the Scunthorpe furnaces (or indeed any other UK furnaces). Although not mandated on private sector developers, this lack of ambition to use Scunthorpe steel, and the absence of any wider ambition to support UK manufacturing, is concerning and means that, in overall terms, the proposal will have a net negative impact on the economy of Lincolnshire.