

Fields for Farming – ISH1 Response Agenda Item 9 – Other (Traffic)

9. Other Matters Raised not specific to the agenda – Traffic

9.1. Policy

A member of the public raised a similar point (disjointed approach and cumulative impact) regarding traffic. The Examining Authority confirmed that although this issue was not included in Issue Specific Hearing 1, they would still be examined during the course of the examination.

9.1.1. Overarching NPS for Energy (EN-1 and EN-3)

Section 15.4 requires the applicant to provide a Transport Assessment and to set out measures to mitigate likely significant adverse effects. The NPS for Renewable Energy (EN-3) is also relevant.

The applicant fails to meet the policy requirements to adequately mitigate the effects, and that the proposed measures do not fully address "likely significant adverse effects" on the local community, especially during the construction period given the spatial and temporal nature of this proposed development and the cumulative impact with its interaction with other projects (in progress, permitted, and planned).

The applicant, in 6.2.13 Chapter 13 Transport & Access ES places much weight on the project not having more than 30% impact (29% impact) when the cumulative impacts are considered. However, the baseline date is not supplied and it cannot be determined if this baseline also includes the many other projects and 'temporary' projects during the survey periods.

9.1.2. Sturton Ward Neighbourhood Plan

The Plan aims to protect the area's rural character and ensure road safety. This proposed development is not aligned to the local plan which seeks to preserve local amenity and road safety.

Restricted Byway 31 (Freeman's Lane and Spring Lane), Sturton le Steeple – closed to all motorised traffic (access for horse-drawn vehicles retained via a Kent carriage gap).

Restricted Byway 32 (Cross Common Lane), Sturton le Steeple – closed to all motorised traffic (access for horse-drawn vehicles retained).

This shows a clear intention within the Plan to protect rural lanes and byways from heavy or inappropriate traffic to preserve their character and safety for non-motorised users.

The Sturton Ward Plan supporting documents raised concern about the suitability of existing "poor road networks".

It clearly aims to restrict traffic on certain minor routes and generally guides development to be mindful of existing infrastructure constraints and the rural character of the area.

9.1.3. Planning Inspectorate Guidance

The guidance on cumulative effects (e.g., Advice Note 11) is relevant. The cumulative impact of traffic from this project and the multiple other projects (solar, nuclear, quarry) has not been adequately assessed, leading to an underestimation of the true impact on the local and regional road network.

9.2. Document 6.2.13 ES Chapter 13 Transport & Access

9.2.1. Suitability of Local Roads

Local roads are not designed for the volume of HGV traffic that this (and cumulative projects) will bring to the community. ES Chapter 13 presents the applicants' assessment of the existing road network.

Once passed Bole Roundabout, the roads are non-classified and minor with limited street lighting and footpaths. Many of the roads are narrow, poorly maintained and suffer from crumbling, potholes and collapsed verges. Many of these roads have no street lighting and no footpaths in sections.

The applicant also proposes to create a number of new access points compounding the danger to other road users and pedestrians. There are many sharp and blind bends and

Gainsborough Road junction with Station Road is hazardous given the visibility splay at this point.

Road closures are a regular occurrence even though projects pledge to work together to co-ordinate and minimise disruption. This week alone there has been one full road closure (Station Road in Sturton le Steeple), three-way traffic control (Cross Street, Sturton le Steeple) and three-way traffic control (Retford Road, North Leverton). Any road closure, irrespective of duration has significant impacts on residents due to linear nature of the villages.

The Applicant claims that all vehicles associated with this project will utilise the same approved route. This cannot be policed and simply will not happen, especially with regard to non-HGVs. We already experience this with the quarry and power station demolition vehicles who use 'rat-runs' to reduce their travel time and operate outside their permitted hours (Nottinghamshire County Council can confirm this regarding quarry).

9.2.2. Safety for Vulnerable Road Users

The safety risks to pedestrians, cyclists, and equestrians are unacceptably high with the temporary but significant increase in HGV traffic on roads and PROW. FFF argue the assessment of the interaction of vehicles (not just HGV's), other project vehicle movements and vulnerable users is underestimated and does not present the worst-case scenario. The mitigation measures do not go far enough to ensure safety.

The road from Bole Roundabout to the West Burton Power Station has no street lighting and no footpaths. The road between Sturton le Steeples and North Wheatley does not have a footpath between the two village boundaries. The road to North Leverton has a single narrow footpath but is unlit. The Examining Authority should also note that Sturton le Steeple, Fenton and Littleborough have no shops and no post offices. Residents of these villages must travel (by road or other means) out of the village for these services using the same roads that the projects use. There is a very limited bus service and no train station (nearest are Gainsborough or Retford).

During the construction period (which is classed as temporary) this project alone has a peak vehicle movement in Month 7 of 1970 vehicle trips and 2362 construction trips, 4,726 trips in and around a village of 221 household (2021 census).

The applicant has suggested a Road Safety Audit but only of the main access points and after DCO consent putting the project costs before public safety (a recurrent theme, assessments after DCO consent).

9.3. Document 6.3.13 Appendix 13.1 Transport and Access Assessment

Para 4.9 If issues arise due to increased traffic volumes or community concerns, the LPA and LHA may request the applicant to review and implement alternative permitted routes.

A review of the local road network will demonstrate there are no alternative routes.

Para 6.2 Peak Movements – Construction is expected to last 24 months with operations 6 days a week, and 10 hours a day, noting that Saturday is a half day. The peak being in month 7.

This equates to 1970 vehicle trips and 2,563 construction trip, and this does not include other projects in the area which will happen either at the same time or sequentially, either way there is a significant cumulative impact yet the assessment does not show this.

9.4. Document 6.3.13 Appendix 13.2 Outline Construction Traffic Management Plan

The applicant relies on a plan that is outline in nature, meaning specific measures and their enforcement have not been finalised. This leaves uncertainty about their effectiveness.

The Outline CTMP sets out the proposed management practices. FFF highlight the generic or vague measures within this document and argue they are insufficient to manage HGV movements safely on local roads and PROW.

9.5. Document 2.3 Access and Rights of Way Plan and 2.6 Site Layout

These documents are not helpful in determining which road will be used (either by HGVs or other vehicles) and what for. It needs to be clear which roads will be used by HGVs and what their impact will be on the community not only in terms of the public highway but also PROWs.

The CTMP suggests that HGV's will delivery all materials to two construction compounds, one on Gainsborough Road (not even classified as a C road), the second through the village to the West on Station Road.

All vehicles will use Gainsborough Road, a road already used by the Power Station demolition, the operational gas power station, the planned BESS, the ash removal, the quarry (set increase due to a recent planning variation), the National Grid pylon maintenance which is scheduled for 2026, and potentially the West Burton Solar Cable as well as this project.

A (unknown) number of vehicles will continue into the village and travel through the part of the village to the second compound on Station Road. What is not clear is how the equipment will then be transported from this second compound to the fields to the West of the railway line as shown in EN010163-000042-2.5 Field Numbering Plan.

9.6. Conclusion

In conclusion, the Examining Authority is urged to find the traffic assessment submitted by Steeples Renewables inadequate because it fails to provide a full, fact-driven analysis of the cumulative impacts on the local road network.

It does not sufficiently account for the combined effects of traffic generation from other major developments in the area, a critical omission that downplays the true potential for severe congestion and safety issues on already strained routes.

By relying on a limited scope and potentially incomplete data regarding peak hour usage and abnormal load movements, the Applicant has not demonstrated that all significant adverse effects have been appropriately identified or mitigated, particularly concerning non-motorised users and the existing sensitive receptors.

This leaves the Authority without the necessary robust evidence to confidently determine that the proposed development's traffic impacts are acceptable or properly managed, and thus the application's transport elements remain fundamentally flawed.