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Your Ref: F7B4604E1

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Via Email:

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25 November 2025

Dear Sir or Madam,

Steeple Renewables Project Development Consent Order (DCO) Application

National Highways welcomes the opportunity to review and comment on relevant documentation received for the proposed development of Steeple Renewables in the Examination stage for Development Consent Order (DCO) Application.

National Highways ("we") have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In this consultation, the following documents have been reviewed:

- Document Reference: EN010163/APP/6.3.13: Transport Assessment
- Document Reference: EN010163/APP/6.2.13: Environmental Statement, Chapter 13, Transport and Access
- Document Reference: P22-1144 TN01: Transport Technical Note

Based on the review of the above documents, we have the following comments:

Operational Traffic Impact

The nearest SRN junction to the proposed solar farm is the Blyth Interchange on the A1 (M) (Junction 34), which is located approximately 20km west of the proposed solar farm. We are content that the traffic to be generated during operation of the proposed solar farm will be minimal at the SRN.

Construction Traffic Impact

We note that access to the site is not proposed directly onto the SRN. As such, Section 175(b) of the Highways Act 1980 (as inserted by The Infrastructure Act 2015) is not relevant.

We note that the construction phase is expected to last 24 months in total, and this period is likely to generate the most significant traffic impacts on the highway network.

We note that deliveries are intended to be outside the typical AM and PM peak hours. We support this and would accept traffic impacts from these deliveries being discounted from any peak hour traffic impact assessment if there is an appropriate planning condition to ensure this is adhered to.

We welcome the provision of the traffic flow diagrams on A1 (M) Junction 34 Blythe Interchange that contain the total Traffic, HGV, and Car/LGVs for the 'Month 7' (peak delivery month) and 'Month 22' (peak construction worker trips), during the construction phase.

With the traffic flow diagrams provided, we now understand and have summarised the peak hour traffic demands at Blythe Interchange in 'Month 7' as:

Total Vehicle	From Site (veh/hr)	To Site (veh/hr)	Total (veh/hr)
AM peak (08:00-09:00)	22	42	64
PM peak (17:00-18:00)	42	22	64

With the traffic impact at the Blythe Interchange is over 30 vehicles / hour during both AM and PM peaks, we recommend junction capacity assessment shall be provided for the Month 7 (peak delivery month) scenario.

Construction Phase

We acknowledge that a Construction Traffic Management Plan (CTMP) will be implemented during the construction phase and National Highways should be consulted on this. The CTMP should cover the anticipated construction traffic flow

during AM and PM peak hours in the month when the maximum construction traffic volume is expected.

Operational Phase

We note that the level of trips associated with the operational phase are likely to be less than during the construction phase. Given the nature of the site and the proposed level of trips during the operational phase, National Highways is content that the level of traffic during the operational phase will not have a material impact on the SRN.

Decommissioning Phase

National Highways is content that a Decommissioning Plan shall be secured through a requirement of the DCO.

Abnormal Loads

We note that the construction contractor has not yet been appointed, the proposed routing for deliveries is therefore unknown at this stage. We encourage the Applicant to engage with National Highways as soon as possible to establish an effective movement strategy when the information of routing dimensions and frequencies of ALLs are available.

It should be noted that Special Orders will be required for loads exceeding 150 tonnes pursuant to section 44 of the Road Traffic Act 1988. This falls outside of the DCO process. A feasibility study should be completed assessing the suitability of the network for the proposed route of the Special Orders. Feasibility studies are high-level assessments designed to determine whether the SRN is structurally capable, at this stage, of accommodating the proposed heavy loads.

Separate to this, the Applicant must submit a formal applications closer to the actual movement date (normally 5 days before) once a haulier has been appointed. At that time, route suitability will be re-checked with all relevant structure and road owners, and a permit for all movements will be issued.

IEMA/ISEP Thresholds

We note that the traffic impact at A1(M) Junction 34 is forecasted to be 336 daily trips during the peak construction delivery (in Month 7). We also acknowledge that while the threshold criteria for ISEP assessment is of 30% daily increase of traffic flow, the existing daily flows at concerned road network would be required to be below circa. 1120 daily vehicles to trigger the need of assessment.

Whilst there is no survey data at A1(M) Junction 34 in WebTRIS datasets, we have carried out an independent check with the data available at the adjacent northbound slip from A1 to Blyth. From that, we are content that the existing traffic flow of A1(M) Junction 34 likely will not be below 1120 daily vehicles and shall not trigger the need of assessment.

Standing advice to the Planning Inspectorate

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

I trust the above comments are helpful. Should you have any queries do not hesitate to get in touch.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Assistant Spatial Planner

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