

East Park Energy Development Consent Order (EN010141)

Comments on any updated or additional documents from the Applicant: Applicant's drive-through of local highway network

Stop East Park Energy (SEPE) is an independent, community-led group established in response to the proposed East Park Energy solar and Battery Energy Storage System (BESS) development. The group, which operates on an unfunded, entirely voluntary basis, has more than 1,000 registered supporters, and comprises residents, landowners and stakeholders from across Hail Weston, Great Staughton, Little Staughton, Pertenhall, Keysoe, Swineshead, and neighbouring settlements including Perry, Stonely, Kimbolton, Catworth, Buckden and St Neots, all of whom may be directly or indirectly affected by the project.

Introduction

This submission provides a critical review of the Applicant's submitted drive-through video intended to illustrate the proposed construction traffic routes associated with the development. While such visual material can be a useful supporting tool, the video in its current form does not present a sufficiently comprehensive, accurate or contextualised representation of the route network.

The observations set out below identify a number of significant omissions, inconsistencies and areas of concern. These issues limit the reliability of the video as an evidence base for assessing traffic impacts and, in particular, may raise questions regarding the adequacy of safety considerations for both construction traffic and existing road users.

1. Incomplete and poorly contextualised route information

The video fails to provide a complete and properly contextualised route overview. Key omissions include:

- Missing sections of the route – for example, site access junctions which require construction traffic to use short sections of the public highway along Great Staughton Road
- Lack of clarity on vehicle type used for the drive-through
- No indication of recording date or time
- No accompanying map or plan to show drive-through sections

- Use of a one-way (non-bidirectional) drive-through, which may minimise or obscure the identification of potential safety risks associated with opposing vehicle movements and real-world traffic conditions

2. Failure to identify local access and hazard points

The video focuses solely on the solar and battery power complex entrance and overlooks numerous existing access points that present safety risks, particularly along winding sections. These include:

- Burial Ground entrance
- Wood End Farm
- Fairytale Marquees
- Adjacent farm entrances
- Residential properties (eg house with lion gateposts)

These locations are critical due to limited visibility and turning movements.

3. Unclear traffic conditions during filming

The video shows unusually light traffic on the B645. It is unclear what day of the week or time of day the footage was recorded, raising questions about how representative the conditions are.

4. Evidence of constrained road handling even in light vehicle

Although the drive-through appears to have been conducted in a standard car, the footage demonstrates that the journey is not straightforward or smooth, and appears at points to involve corrective steering or constrained manoeuvring. This is particularly the case along the Pigg's Hill section of the B645, a well-known accident blackspot locally described as a sharp, treacherous bend characterised by poor road conditions, including surface water pooling that is particularly dangerous in the dark and winter driving conditions. It is also evident on other bends or banked passages along the route, reinforcing concerns about how much more challenging these sections would be for volumes and convoys of much larger, loaded HGVs, including two-way project construction traffic on these single carriageway roads.

5. Lack of wider road network context

The video does not place the proposed routes within the broader local road network. For example, two of the roads identified for disruption are in fact two of the three principal access routes into Little Staughton, yet this significance is not acknowledged.

This applies to other villages and other sections of the route.

6. Missing context at key junctions

The approach to the junction at Green End, Pertenhall (connecting to the B660 from Great Staughton), is excluded. The video resumes only after the left-hand turn, omitting a blind junction where HGVs swinging wide could pose a significant collision risk. This omission is particularly concerning.

7. Incomplete representation of Hail Weston access points

In the Hail Weston section, only a minor road (Birds Lane) is acknowledged. The main access routes – High Street at both ends of the village and Green End Lane – are omitted, despite being the primary entry and exit points for residents.

8. Omission of additional construction traffic routes

The developer indicates that other roads will be used during internal road construction and potentially during decommissioning. These roads have not yet been clearly identified or assessed, and the period of time such roads would be used in this way has not yet been made clear. Given the substantial volume of materials to be transported by HGVs, these additional routes should be clearly identified and assessed.

9. Potential use of unassessed rural roads

There is a clear concern that, despite proposed traffic controls, additional rural roads within the local network may be used by project construction traffic. These routes are neither referenced nor assessed in the drive-through video, creating uncertainty about the full extent of traffic impacts. Given the scale of HGV movements anticipated, the omission of these additional roads raises significant questions about whether the assessment fully captures real-world traffic behaviour and routing.

10. Seasonal and weather-related risks

The video does not account for how these rural roads will appear to unfamiliar HGV drivers in adverse conditions, such as winter darkness, rain, mud or snow – particularly when compounded by construction traffic.

11. Additional infrastructure works not fully considered

The video does not adequately reflect other associated works, such as:

- Modifications to the main site entrance
- Alterations to junctions (eg Great Staughton to Little Staughton road) to accommodate HGV turning movements, including AIL movements

These changes will have further traffic and safety implications that are not addressed.

Conclusion

In summary, the drive-through video falls short of providing a robust or representative assessment of the proposed construction traffic routes. The cumulative effect of the omissions identified – including incomplete route coverage, lack of contextual information, absence of realistic traffic conditions, and failure to address key hazards and access points – significantly undermines its evidential value.

Of particular concern is the potential for safety risks to be understated, especially given the reliance on a simplified and non-bidirectional representation of vehicle movements and the omission of critical junctions and local access routes. When considered alongside the scale and nature of anticipated construction traffic, including heavy goods vehicles and abnormal loads, these gaps are material.

It is therefore recommended that a more comprehensive and transparently evidenced assessment is undertaken. This should include full route mapping, representative traffic conditions, two-way vehicle movements, and detailed consideration of all affected roads, junctions and receptors, including proposed construction access points where they interact directly with the public highway, in order to provide a more reliable basis for evaluating traffic and safety impacts.

Notes:

The following submissions should be read/viewed in conjunction with, and are relevant to, a range of issues raised in this document.

1. A further, more detailed submission on construction traffic issues is being made by SEPE at Deadline 2.
2. A film submission (accompanied by a note) showing a section of the construction traffic route from the perspective of an HGV cab has been requested by SEPE ahead of Deadline 2.