STOP
EAST PARK
ENERGY
SOIL OVER SOLAR

28 April 2026

East Park Energy Development Consent Order (EN010141)

Comments on National Highways Statement of Common Ground, the updated Outline Construction Traffic Management Plan, and the Applicant's Technical Note on impact on the B645 / A1 St Neots junction

For the attention of National Highways and the Examining Authority

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.

1. Introduction

These comments concern unresolved matters relating to the Applicant's updated Outline Construction Traffic Management Plan (oCTMP), the Outline Construction Workers Travel Plan (oCWTP), the Technical Note on Impact on the B645 / A1 St Neots Junction (EN010141/DR/8.23), and matters remaining "under discussion" in the National Highways Statement of Common Ground, including SoCG Ref 8 ("The conclusions in respect of the assessment of traffic and transport impacts and effects").

Given that SoCG Ref 8 remains under discussion, these comments raise an additional issue for consideration as to whether consequences arising from the proposed A1 routing strategy, specifically potential U-turn-related impacts beyond the immediate A1/B645 junction, have been fully addressed.

While the Applicant has responded to some concerns raised by National Highways (NH), Cambridgeshire County Council (CCC) and Bedford Borough Council (BBC), important issues remain unresolved. In particular, there appears to be a potential gap in the assessment of safety and capacity impacts arising not only at the A1/B645 junction itself, but also at other junctions where the proposed left-in/left-out routing strategy may give rise to U-turning HGV movements, namely:

- A1 Little Paxton junction
- A1 Buckden Roundabout

These movements may arise as a consequence of the Applicant's routing strategy and raise a question considered further in Section 2 as to whether their implications have been explicitly assessed.

Section 2 also considers whether there may be a reasonably foreseeable scenario in which displaced or reassigned southbound HGV movements could have implications for the A1/A428 Wyboston junction, not as a primary U-turn location, but as a related junction where wider effects may warrant consideration.

2. U-turning construction traffic has not been adequately assessed

The routing strategy described in the updated oCTMP, including the prescribed approach to the Site via the B645 from the A1 at Eaton Socon, appears likely to give rise to U-turning HGV movements at Little Paxton junction and/or Buckden Roundabout in order to facilitate the left-in / left-out arrangement at the A1/B645 junction.

Those U-turn movements appear to be a potential consequence of the proposed routing strategy, yet their safety and capacity implications do not appear to have been explicitly assessed.

The point made is not that such effects necessarily arise, but that the basis on which they have been considered is not presently clear.

This may be particularly relevant in relation to Little Paxton junction, where the southbound merge arrangement includes a give-way controlled movement onto the A1, which may raise additional questions regarding the operation of HGV joining movements and associated safety implications if U-turning construction traffic were to use that route.

In addition, if U-turning construction traffic were to utilise Little Paxton junction, this may give rise to a question whether effects on nearby residential receptors have been sufficiently considered. Such movements could introduce HGV traffic in close proximity to residential properties potentially not understood to fall within the scope of assessed project traffic impacts during statutory consultation, given that this potential consequence does not appear to have been explicitly identified. This may warrant further consideration.

A related question may arise as to whether potentially affected receptors at Little Paxton and Buckden have been sufficiently considered in light of the information presented during consultation. Neither the statutory nor non-statutory consultation materials appear to have identified Little Paxton junction or Buckden Roundabout as locations potentially affected by project-related traffic, nor did the consultation masterplan mapping appear to show those locations within the apparent scope of traffic effects presented to the public. In that context, there is a question whether residents in proximity to those junctions could reasonably have understood themselves to be potential receptors of project traffic impacts. To the extent that these implications arise from later-emerging routing assumptions, this may warrant consideration as to whether those implications have been sufficiently communicated and considered.

A further issue for consideration may arise in relation to the A1/A428 Wyboston junction. While Wyboston is not identified here as a primary U-turn location for the Proposed Development, it may be a reasonably foreseeable routing scenario that some construction traffic travelling southbound on the A1, which cannot utilise the southbound A1/B645 junction, could instead use the A1/A428 Wyboston junction, which appears to offer a shorter route (by approximately five miles). If so, this may warrant consideration as part of any assessment of whether displaced or reassigned HGV movements could give rise to wider junction effects. This may be of potential relevance given concerns raised by Cambridgeshire County Council in the A428 Black Cat to Caxton Gibbet Examination regarding traffic queuing on the Great North Road southbound approach to the Wyboston junction, including potential effects extending towards Nelson Road roundabout.

While the National Highways SoCG does not expressly identify Little Paxton or Buckden U-turn impacts as a matter in dispute, SoCG Ref 8 ("The conclusions in respect of the assessment of traffic and transport impacts and effects") remains under discussion. In that context, the question of whether these consequences require explicit assessment remains legitimately open.

Relevant precedent from A428 Black Cat to Caxton Gibbet

A relevant point of reference is the A428 Black Cat to Caxton Gibbet DCO Examination, where Cambridgeshire County Council raised concerns regarding U-turn-related safety and capacity effects at major junctions, including Buckden Roundabout, and sought detailed modelling, including:

- VISSIM assessment at Buckden; and
- ARCADY assessment at Wyboston Roundabout.

Wyboston is referenced here primarily as precedent, although the possibility of reasonably foreseeable displaced or reassigned movements via that junction may also warrant consideration. In any event, it provides evidence that the highway authority has previously regarded U-turn-related impacts and associated junction effects as a matter requiring explicit assessment.

Cambridgeshire County Council's Wyboston and Barford Road Roundabouts Mitigation Note concluded those roundabouts would be over capacity in 2040 with the A428 scheme.

That precedent supports the need for comparable scrutiny of U-turn movements generated by the EPE routing strategy, and may also be relevant to consideration of whether any displaced or reassigned movements could have wider junction implications.

Request

National Highways, Cambridgeshire County Council and the Examining Authority are respectfully invited to consider whether further assessment should be required of the safety and capacity implications of U-turning HGV construction traffic at Little Paxton junction and/or Buckden Roundabout, whether any question arises as to potential implications for nearby residential receptors and potentially affected receptors not

previously identified in consultation materials warrants consideration, and whether any reasonably foreseeable displaced or reassigned HGV movements via the A1/A428 Wyboston junction also warrant consideration, having regard to the approach previously taken by Cambridgeshire County Council in relation to comparable U-turn-related issues in the A428 Black Cat to Caxton Gibbet Examination.

3. Concerns regarding the A1/B645 junction Technical Note

Single-day survey methodology

Paragraph 2.2.3 relies on one day of turning count and queue surveys (11 March 2026).

That appears limited for a junction-specific appraisal of this significance.

A more robust approach would ordinarily include:

- multi-day or 7-day Automatic Traffic Counts to validate representativeness;
- confirmation no atypical conditions affected the survey day;
- sensitivity testing for peak-period variability.

Modelling tool

The Applicant uses PICADY (Junctions 10) for the A1 northbound slip/B645 junction.

While PICADY may be suitable for isolated priority junctions, there is a legitimate question whether it is the most appropriate tool for a junction operating as part of an interacting three-junction arrangement involving:

- slip roads
- a mini roundabout
- mainline safety considerations.

Given precedent elsewhere, the need for more sophisticated modelling should be considered.

For example, National Highways was required to produce VISSIM modelling for Buckden Roundabout in the A428 Black Cat to Caxton Gibbet Examination, illustrating that more detailed modelling has previously been considered necessary where interacting junction effects and turning movements raise concern. That precedent may be relevant in considering whether the present appraisal is sufficiently robust.

Lifecycle assessment gap

The Technical Note addresses construction phase impacts, but does not appear to assess:

- operational replacement traffic;
- component replacement traffic (including mid-life replacement, where relevant);

- decommissioning traffic;
- future-year growth effects at those later stages.

This warrants further explanation.

4. Construction routing and access strategy concerns

(a) Permitted routes / restricted routes

The application still does not appear to provide a clear Construction Traffic Permitted Routes / Restricted Routes Plan for the wider affected area.

This has been requested by local highway authorities and appears consistent with practice adopted on comparable NSIP schemes.

A detailed plan should be prepared, agreed with the highway authorities, and consideration given to securing it through the DCO.

More broadly, these issues emphasise that the oCTMP does not yet appear to provide a sufficiently explicit and comprehensive statement of which existing roads may be used by construction traffic, nor a clear permitted routes / restricted routes framework of the kind sought by the Local Highway Authorities and several Interested Parties. In that context, a Construction Traffic Permitted Routes / Restricted Routes Plan should be prepared for the wider affected area, including the area bounded by the A1, the A14, Bedford to the south, and the B660 / Swineshead Road to the west, and consideration given to securing it through the DCO.

(b) Public highway use between SA10 and SA12

Paragraph 5.1.13 proposes HGV movements between SA10 and SA12 using sections of Great Staughton Road and Spring Hill Road, supported by minor road widening.

However, Appendix C appears to show a temporary internal haul road along the cabling corridor between Sites B and C.

While some northern parts of Site B may require access from Great Staughton Road, it is unclear why HGV movements between SA10 and SA12 would rely on the public highway where an internal haul route appears available for those movements, absent explanation as to why that alternative would not be reasonably practicable.

Relatedly, the basis on which proposed internal haul routes would accommodate the range and frequency of intended HGV construction movements is not clearly explained and may warrant further clarification.

(c) Minimal forecast traffic at SA03–SA06 and SA09

The Applicant's traffic-flow diagrams appear to assign very low movements to:

- SA03
- SA04
- SA06
- SA09

despite these accesses serving substantial areas of development and satellite compounds, including parcels proposed for solar panel installation and associated construction activity.

In particular, the movement assumptions appear low when considered against the apparent scale of land served, including approximately 4 hectares at SA03, 6.25 hectares at SA04, 20 hectares at SA06 and approximately 60 hectares associated with SA09 together with the access requirements associated with the satellite compound near Green End.

While the application includes traffic-flow diagrams, indicative access drawings and references to internal haul routes, it does not clearly explain how these areas can be constructed with such limited forecast movements, nor does it transparently disaggregate the assumptions underpinning those forecasts, including:

- delivery assumptions for panels, mounting structures, cabling and associated materials;
- staff access assumptions;
- plant and equipment movements;
- the extent to which internal haul routes are assumed to substitute for public highway movements;
- whether access-specific movements include all construction phases, including compound establishment and temporary works; and
- whether forecast movements reflect peak construction activity or only average assumptions.

It is unclear whether the forecasts fully account for the practical implications of access geometry, potential road widening, visibility constraints or the relationship between individual access points and the proposed internal haul strategy.

This creates uncertainty as to whether localised construction activity may be understated, or at least whether the basis for the very low movement assumptions has been sufficiently explained to enable proper scrutiny.

5. Site access design and visibility splays

The changes to visibility splays and access geometry raise continuing concerns, particularly where:

- full DMRB-compliant splays cannot be achieved;
- temporary speed reductions are relied upon to reduce visibility requirements;
- some Appendix D plans appear still to show visibility splays derived using Manual for Streets criteria.

These matters have already been identified in BBC's LIR.

Further:

- designs appear based on OS MasterMap, rather than detailed topographical survey;
- this may understate, or may not fully capture, road widening, hedgerow removal and associated environmental effects.

Worst-case assumptions, including the extent of visibility-related works and associated hedgerow effects, should be tested.

Relatedly, it is not clear whether the assessment fully addresses traffic management arrangements or diversion implications associated with constructing access works and localised road widening itself.

6. Highway condition, enforcement and monitoring

The proposed Highway Condition Survey should apply not only before and after construction, but also before and after:

- operational replacement works
- decommissioning works.

Consideration should be given to securing these requirements through the DCO.

This may be particularly relevant in light of existing freight restrictions on parts of the local road network west of the A1, including areas subject to 18-tonne restrictions, which reinforce the need for clarity as to route suitability and road condition effects.

Similarly, proposed enforcement mechanisms, including:

- delivery slot control
- ANPR or geofencing
- route compliance monitoring

are currently described in principle, but not clearly secured.

The practical resourcing of monitoring and enforcement may also warrant clarification, noting requests by local highway authorities in relation to monitoring arrangements.

It is also unclear how delivery slot allocation and associated route compliance measures would be monitored, managed and enforced in practice, if relied upon in the assessment.

If relied upon in the assessment, consideration should be given to securing them as enforceable requirements, rather than leaving them as optional future measures.

7. Construction worker traffic assumptions

The Outline Construction Workers Travel Plan (oCWTP) (Appendix to the Outline Construction Traffic Management Plan, Deadline 1 update) assumes an average car occupancy target of two workers per vehicle.

National Highways has expressed concern regarding the large number of construction workers expected to drive to the site and has requested additional explanation concerning impacts at the A1/B645 junction, including whether further modelling is required.

In that context, there is a legitimate question whether sensitivity testing should be undertaken to examine the implications if the assumed average car occupancy of two workers per vehicle is not achieved in practice.

This may be particularly relevant given National Highways' Relevant Representation (Section 4.3.4) raised concern that an average occupancy assumption of two workers per vehicle may be high compared with assumptions used on other comparable schemes, and indicated that lower occupancy assumptions (for example 1.4 persons per vehicle) could materially increase worker vehicle movements accessing the site and may have consequential implications for traffic effects on the A1 corridor, including any U-turn movements associated with the proposed routing strategy. That consideration may warrant explicit sensitivity testing.

8. Conclusions and requests

The Applicant has responded to some concerns, but material issues remain unresolved.

In particular, National Highways and the Examining Authority are respectfully requested to consider requiring:

1. Assessment of U-turning HGV impacts at Little Paxton and/or Buckden, including whether potential implications for nearby residential receptors at Little Paxton and any reasonably foreseeable displaced or reassigned HGV movements via the A1/A428 Wyboston junction also warrant consideration, or, at minimum, consideration of whether further assessment of those matters should be required, having regard to previous highway authority concern regarding comparable U-turn-related and queuing issues in the A428 Black Cat to Caxton Gibbet Examination.
2. Review of whether the A1/B645 Technical Note uses sufficiently robust survey and modelling methods.
3. A detailed permitted / restricted construction routes plan.
4. Reconsideration of the justification for public highway use between SA10 and SA12, including whether internal haul routing should be preferred.

5. Clarification of the very low movement assumptions at SA03–SA06 and SA09.
6. Further scrutiny of visibility splays, access design assumptions and associated hedgerow impacts.
7. Consideration of securing through the DCO requirements for monitoring, enforcement and highway condition surveys across all project lifecycle phases.
8. Sensitivity testing of worker traffic assumptions using lower average vehicle occupancy rates.

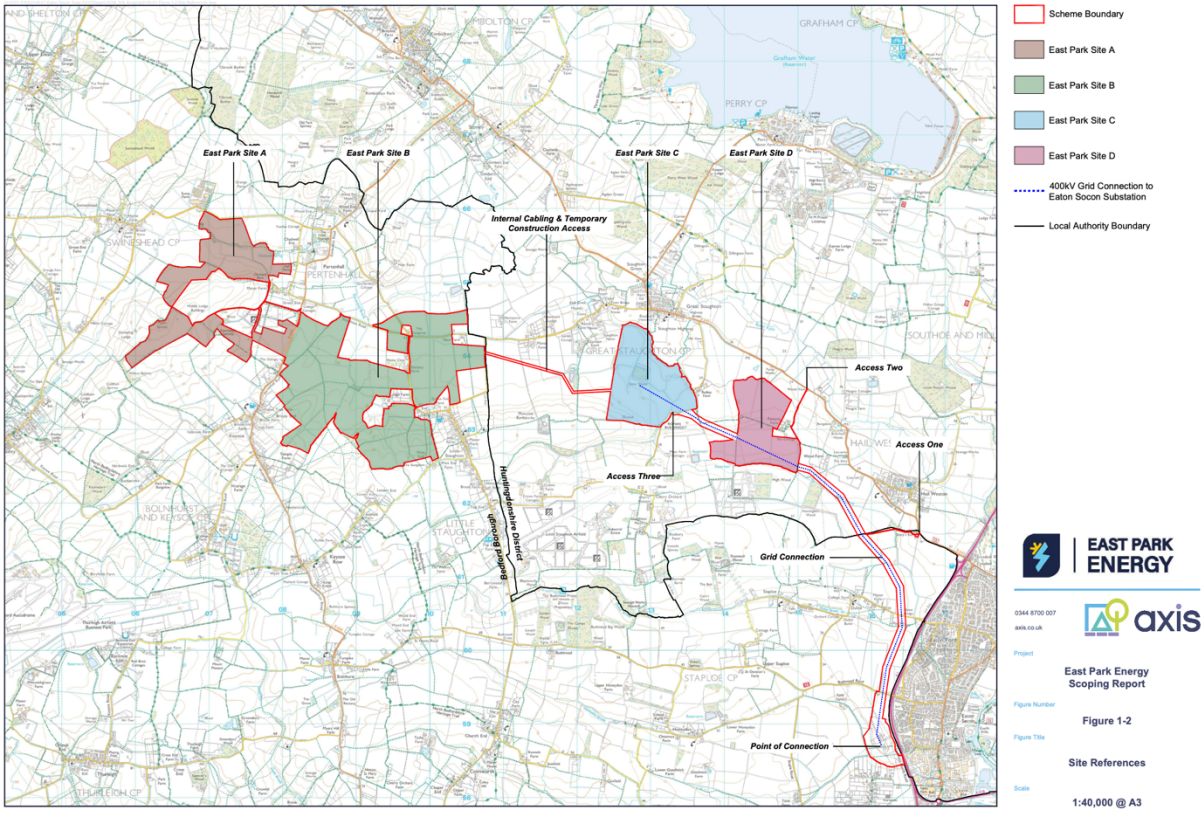
These matters remain relevant to SoCG Ref 8, which remains unresolved, and may be relevant to consideration of whether the assessment of traffic and transport impacts can be regarded as sufficiently robust.

Appendix A provides supplementary observations informed by discussions with a transport manager with 30 years' professional experience and local and national hauliers. The Appendix does not introduce new principal objections, but provides practical context relevant to matters already raised in the main text, in particular routing realism, enforceability of traffic controls, the operation of internal haul routes, potential effects associated with displaced or reassigned HGV movements, and the robustness of assumptions underpinning the Applicant's traffic assessment. It is provided to assist National Highways and the Examining Authority in considering whether those matters may warrant further scrutiny.

Appendix A: Observations from a transport manager with 30 years' professional experience following discussions with local and national hauliers

Selection of construction access point (Site D)

Earlier project documentation, including the 2023 non-statutory consultation material, indicates that two access points were originally proposed for Site D from the B645 (Access One and Access Two). Access One appears materially closer to the A1/B645 junction. Access Two is located in the vicinity of the principal construction traffic access point now proposed within the submitted application.



'Draft masterplan': https://eastparkenergy.co.uk/wp-content/uploads/2024/06/Masterplan.pdf

The access strategy presented in the submitted application requires construction traffic to navigate a constrained section of the B645, including Pigg's Hill, which may introduce additional highway safety considerations.

The final principal construction traffic access point appears to represent a departure from earlier proposals, raising questions as to whether highway safety considerations have been adequately assessed and prioritised in determining the final proposed access arrangements.

A related question arises as to whether the earlier "Access One" option may have represented a potentially safer or less constrained route for construction traffic, and if so whether the reasons for its evolution or omission have been sufficiently explained. This observation is not advanced as a freestanding objection to the current access

proposal, but as a contextual point relevant to whether reasonable alternatives and associated highway safety implications have been adequately scrutinised.

Traffic management and enforcement concerns

There are significant concerns regarding the practical ability of East Park Energy (EPE) to manage and enforce designated traffic routes.

The haulage sector has seen an increasing reliance on internationally sourced drivers, often operating at lower cost and heavily dependent on satellite navigation systems. Such systems do not necessarily align with prescribed routing strategies.

This creates a material risk that drivers will not adhere to designated routes, thereby undermining the effectiveness of any proposed traffic management plan. As a result, there is limited confidence that EPE will be able to exercise meaningful control over vehicle movements in practice.

Unsuitability of rural and makeshift roads

It is highly unlikely that haulage operators will utilise makeshift or cross-country routes across the site when operating high-value HGVs (typically in the region of £100,000).

The use of such routes presents a significant risk of vehicle damage and operational inefficiency. In addition, repeated use would likely result in substantial and lasting damage to the road surface and surrounding land.

In practice, drivers can reasonably be expected to default to established highway routes, irrespective of any proposed restrictions or guidance.

Impact of lifting weight restrictions

The temporary removal of weight restrictions across the local rural road network has the potential to significantly increase wider HGV traffic volumes, potentially increasing heavy vehicle movements on the local road network.

There is limited confidence that such changes would be effectively monitored or enforced by the relevant highway authorities. This creates a risk of:

- Increased heavy traffic on roads that are not designed or suitable for such use
- Structural damage to older properties located along affected routes
- Additional and unmanaged traffic flows through settlements including Kimbolton, Ellington and surrounding areas

Limitations of enforcement measures

The proposed use of Automatic Number Plate Recognition (ANPR) cameras presents a number of practical and operational limitations:

- EPE does not possess enforcement authority over third-party haulage operators
- Effective enforcement would require continuous (24/7) monitoring, which is not realistic
- Effective enforcement may depend in part on third-party regulatory or highway authority involvement beyond the Applicant's direct control
- The cost of installation and operation across multiple routes would be substantial and potentially disproportionate

Taken together, these factors indicate that effective enforcement of routing controls may be difficult to achieve in practice.

Operational constraints for hauliers

Haulage operations typically involve multiple loads per day, with start times often significantly earlier than those indicated within the application.

For example, at the Cobholden Solar scheme, delivery vehicles have been observed queuing from approximately 6:30am.

This suggests that the operational assumptions presented within the application may not accurately reflect real-world haulage practices.

Peak-time traffic implications

The assumption that all staff will arrive at 8:00am concentrates workforce movements within an already congested peak travel period.

This is likely to exacerbate existing traffic pressures rather than mitigate them, contrary to the stated objectives of the traffic management strategy.

Safety risks at A1 junctions

The requirement for all HGVs to travel northbound before heading south appears to displace traffic impacts rather than resolve them.

This approach is likely to increase pressure on Little Paxton, which already experiences HGV traffic associated with Hanson Quarry operations.

Right-turn movements at the A1 junction are of particular concern. Increased traffic volumes at this location may materially elevate the risk of collisions, creating a location of potential heightened safety sensitivity.

Furthermore, it is unlikely that drivers will continue north to Buckden due to:

- Speed restrictions along this section of the A1
- The operational difficulty of navigating the Buckden roundabout

Inaccuracies in documentation

An error has been identified in the application documentation relating to road naming. The route described as “Spring Hill Road” (between Pertenhall Road and Little Staughton) is, in fact, unnamed.

This raises questions regarding aspects of the accuracy and reliability of the submitted information.