



Tophams CTMP Final Version and CEMP

2 March 2026 at 13:39

To:
Cc:

Thanks for this

Having spoken with our Network Management team, we are willing to allow some flexibility on the 2 per day articulated lorry limit. However, we need to be clear under what exceptional circumstances this is able to occur. I suggest an increase to a maximum of 4 per day (i.e. eight two-way movements) on the basis they do not overlap on the highway network along Bygrave Road / Ashwell Road, and take place between the hours of 09:30-14:30. 'Exceptional circumstances' also needs to be defined, and I suggest the following would cover it:

- Deliveries delayed because of:
 - Adverse weather conditions
 - Temporary road incidents
 - Emergency works on delivery routes
 - Other unavoidable delay of delivery (please specify)

Log book records will need to be kept of all HGV movements to document this, and available for inspection at the request of the LPA.

Can you confirm you are agreeable to this?

will need to advise whether the wording of condition 26 needs to be formally changed through a variation of condition application (given it is very specific about the 2-per day artic limit), and I'm sure you're aware of the scrutiny and disquiet about this development in the local community – as such, any changes you now propose may risk it going back to committee for further discussion.

The rest of the amended CTMP looks ok now.

Hope that helps.

Regards

Area Manager (East) | Highways Development Management | Growth & Environment | Hertfordshire County Council

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From:
Sent: 29 January 2026 11:03
To:

11/05/2026, 13:44

PACE (Pathfinder Clean Energy) Mail - Tophams CTMP Final Version and CEMP

Cc: [REDACTED]

Subject: Tophams CTMP Final Version and CEMP

 V5 Construction Environment Management Plan Tophams (22_00741_FP).pdf

 V5 CTMP Tophams (22_00741_FP).pdf

Dear [REDACTED] & [REDACTED]

Following on from a call with [REDACTED] on Tuesday 20th January 2026, we have worked through the remaining issues with the CTMP and the final version is attached to this email. Likewise the final CEMP is also attached.

All points raised by [REDACTED]

in response to the CTMP were agreeable from our position, apart from the wording in relation to the two articulated vehicle daily restrictions.

In the attached CTMP, the following wording has been included under point 3.1:

"PACE commits to limiting articulated lorry movements to a maximum of two visits per day for the majority of the construction period, in accordance with Condition 26. Daily vehicle movements will be managed through the booking system and site management controls set out in this CTMP, having regard to construction phasing and the objective of minimising overall impacts on the local highway network."

[REDACTED] raised concerns during our last call regarding the use of the word "majority" within this wording. We have therefore set out below the planning rationale for retaining a degree of flexibility in the management of articulated vehicle movements during construction. These [REDACTED]ers have been raised by the appointed EPC contractor who will be responsible for delivering the project and who is currently finalising the construction programme.

Firstly, construction logistics are inherently subject to factors outside the control of the developer, including adverse weather conditions, temporary road incidents, emergency events and wider network disruption. A rigid daily cap, without allowance for day-to-day variation, would limit the ability of the Site Manager to respond dynamically to such circumstances and manage deliveries in a way that minimises disruption on the highway network as a whole.

Secondly, a number of key components associated with the development, including PV modules, mounting systems and cabling, are supplied in 40-foot containers and, by their nature, require delivery by articulated vehicles. Under a strict two-articulated-vehicle-per-day regime, delivery of these components would extend the construction programme by almost four additional months compared to a standard, short delivery window. In practice, this would also necessitate the re-handling of panels and equipment into smaller vehicles, increasing the risk of damage through repeated handling and extending the period for which shipping containers are required to be retained on hire, with consequential effects on construction logistics and programme efficiency.

An extended construction period would materially increase the duration over which construction traffic is present on the local road network. This would include not only increased HGV movements, but also a significantly higher number of daily trips by site operatives and supervisory staff required to manage, unload and coordinate deliveries. The result would be a substantially greater cumulative impact on the highway network over time than a shorter, more concentrated construction phase. For completeness, it is also noted that alternative delivery solutions, such as reliance on curtain-sided vehicles, would substantially increase the total number of HGV movements required, further intensifying disruption on the local road network.

The duration of construction activity is a recognised material consideration in the assessment of transport and amenity impacts. A prolonged "drip-fed" delivery approach would extend noise, dust and traffic disturbance over several additional months, whereas a managed and time-limited delivery programme would allow impacts to be more predictable, controlled and temporary in nature.

It is also important to note that detailed transport assessments have already been undertaken as part of the permitted scheme, including swept path analysis, visibility splay assessments and localised highway works along the construction route. These assessments demonstrate that articulated vehicles can safely utilise the approved route with appropriate management and mitigation in place. The ongoing enabling works along the route are intended to support safe and efficient construction access, including for articulated vehicles, rather than to introduce any new or unassessed highway impacts.

The Reason for the Condition Imposed

The planning condition is clear that its purpose is to minimise the impact of construction vehicles on the local road network. It is noted that the condition does not identify a specific highway safety concern or technical deficiency, and that the transport assessments submitted with the application, including swept path analysis, visibility splays and route assessments, demonstrate that articulated vehicles can safely utilise the approved construction route with appropriate management measures in place.

In this context, the two-articulated-vehicle limitation is understood as a traffic management measure rather than a response to a demonstrable highway safety issue. This approach is consistent with national policy, including NPPF paragraphs 110 to 112, which require development to provide safe and suitable access, ensure that transport impacts are appropriately mitigated, and avoid restrictions on development where impacts can be managed to an acceptable level.

A proportionate and flexible approach within the CTMP, focused on managing construction traffic in a way that minimises cumulative impacts over the construction period as a whole, is therefore considered to align with both the intent of the condition and the tests for planning conditions set out in national policy.

Summary

The proposed wording is intended to reflect that approach by maintaining adherence to the two-articulated-vehicle limit for the vast majority of the construction period, while avoiding an overly rigid interpretation that could inadvertently increase cumulative traffic, amenity and highway impacts. We would be very happy to discuss alternative wording that achieves this outcome, including, for example, wording that clarifies that the two-articulated-vehicle limit would be adhered to for the substantial majority (for example, circa 90%) of the construction period, while allowing limited flexibility within a defined delivery window, still meeting the requirement for a clear 'commitment' to the articulated vehicle limit.

We trust this explanation clarifies the intent behind the proposed wording, and we would welcome your suggestions on any alternative formulation that you feel would better capture this balance while remaining consistent with the purpose of Condition 26.

Kind Regards,

[REDACTED]
Planning Manager - UK

PACE - Pathfinder Clean Energy
[REDACTED]

[REDACTED]

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