

The scale of the proposed solar farm is vast and would encompass the majority of Frodsham marsh. Many residents have major concerns regarding the loss of so much green belt and its impact on the landscape. There are several positive aspects to the planned development. i.e.

1. New interlinked permissive tracks. The introduction of 4.5km of permissive tracks which would support more active travel for cyclists, walkers, wheelers and equestrians.

However, whilst this is promising, it is very difficult for residents to visualise what it would be like to use them from the limited number of photo predictions.

2. Information displays to engage people as they travel around the site which may encourage people to explore the area more.

3. Access for the disabled would be provided on tarmacked routes closer to the town but routes further away from the town would not be tarmacked.

However, Cubico has dismissed several critical residual issues.

There are several miles of Restricted Byways which are important for both leisure purpose and commuting between Frodsham, Helsby and many employers in Elton. Ince, Thornton, Stanlow and Ellesmere Port. National Cycle Route NCN 5 crosses the marshes and the development.

4.1. Impact on visual aspects. "Chapter 6: Landscape and Visual Amenity [EN010153/DR/6.1] does identify significant residual adverse visual effects, but only for the users of the PRowWs that pass through the Proposed Development. These effects cannot be further mitigated through the mitigation hierarchy. Paragraph 5.10.13 of National Policy Statement EN-1 acknowledges that major energy projects are "likely to have visual effects for many receptors around proposed sites". What Cubico's response does not say is that EN 1 also states in clause

5.10.6 Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

What Cubico also does not say is that Clause 5.11.30 states :

5.11.30 Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access.

4.2 Impact on access

Currently many sections of these Byways are very badly degraded due to frequent use by heavy agricultural vehicles and consequently only used by commuting cyclists reluctantly and this situation will get worse during the construction phase as all materials will be carried the length of the primary Byway from Ince to the Frodsham marsh.

Their poor state is exacerbated in winter with deep flooded potholes as there is neither a camber, nor effective drainage compounded by mud banks on either side which stop drainage.

This has a serious adverse impact for not only leisure, commuters and service vehicles but potentially also emergency services who in future may require access.

I note that the Examiners have already identified the need to consider the broader question of considering the interplay between the Solar Farm application and anticipated applications for both the CO2 and H2 pipeline in its summary of the Principal Issues.

I agree strongly and believe that the independent contractor should be engaged to evaluate the risks and propose an appropriate course of action.

4.3 The impact of construction traffic.

The vast scale of the project will undoubtedly require hundreds of heavy vehicles travelling down the designated access route from Ince along Lordship Lane to the construction site. This will have a significant impact on cyclists and pedestrians being able to use the route safely which would deter active travel.

Cubico should be asked to explore the delivery of all construction materials to a pier on the Manchester ship canal by Frodsham marsh farm.

If this is not possible all deliveries should be made outside the normal working day to enable active travel to continue safely on Lordship Lane and reduce the pressure on both the frequently overloaded M56 and Ince village

Cubico should be responsible for returning this lane to better than its original condition.

4.3 Planning requirements.

My understanding is there are least four basic requirements are applicable in respect of maintaining and improving access for active travel. i.e.

1. National Planning Policy Document Policy

Paragraph NPS EN-1 Para. 5.11.6

The government aims to ensure adequate provision of high-quality open spaces and sports and recreation facilities to meet community needs.

Para. 104 Planning should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users for example by adding links to existing networks like National Trails.

Para 108 Planning should identify and pursue opportunities to promote walking, cycling and public transport.

2. EN 1 : 5.11.30 Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access.

3. Cheshire West & Chester Planning policy

Cheshire West and Chester Local Plan (Part One) Strategic Policies (January 2015)

12.2.13 With specific reference to DM37 (recreational routeways). Opportunities to improve the quality, accessibility and connectivity of the network of recreational routeways should be maximised. Measures to enhance existing routes might include: upgrades to facilitate shared use and accommodate the needs of different users. There is specific reference to improving the cycle route across Frodsham Marshes in DM37.

4. National Planning Policy framework : Section 13 focuses on developments on Greenbelt

156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

b. necessary improvements to local or national infrastructure; and

c. the provision of new, or improvements to existing, green spaces that are accessible to the public.

My reading of the Cubico application is that it has not addressed either of these requirements intended to improve access as its application is isolated behind the scope boundaries only; whereas providing improved access requires Cubico to consider and propose improvements which integrate coherently with the existing external active travel and transport infrastructure to meet the needs of residents and visitors wishing to use the PROWs within the scope boundaries and new permitted tracks.

Finally, Cheshire West & Chester has developed a Climate emergency Plan 2025-2030 which places heavy emphasis on encouraging Active Travel in Chapter 7.

7 Transport

7.1 Sector Analysis

Emissions from transport represent a significant and growing proportion of west Cheshire's emissions profile (24.6%), with on-road transport contributing to over 85% of these emissions. This section assesses our climate goals and ambitions for transport, including increased use of active and sustainable modes.....

However, Cubico has dismissed several critical residual issues.

Each of these was raised energetically in the Active Travel representatives meeting in January 2025. The current scenario is summarised below :

1. Effect on the Landscape.

It is widely recognised in the local community that if the proposed 600 acre solar farm was built on green belt it would have a huge negative impact on what are currently very attractive view from the top of Frodsham and Helsby hill dramatically and irreversibly.

Essentially 600 acres of attractive green fields would be replaced by a monotonous dull black area that looks like a vast tarmacked car park. i.e. it looks industrial & totally unnatural.

Feedback was also expressed and recorded in written responses to the pre-application survey in 2025 before the application was submitted to the Planning Inspectorate in June 2025. The feedback is summarised in the section on 'Landscape and Visual; pp.16 -22. This shows that 37 responses many of which relate directly to views from the hill.

The following extracts taken for Cubico's responses are repeatedly dismissive of the views expressed by residents of Frodsham & Helsby with their combined population of over 15,000 people.

4.1 Cubico's response on pp. 17, to feedback specific to views from high ground, i.e. No's, FS2-OFF -033, 032, 051, 056, 019, is dismissive when it states :

"- assessment from elevated positions including at Frodsham Hill and Helsby Hill and concludes that visual effects would not be significant." and

"Mitigation measures such as planting for screening would not be effective given the change in elevation.

4.2 Cubico's response on pp.16 to feedback expressing broader concern for the visual impact. i.e. No's FS2\_OFF\_007, 009, 012, 014, 017, 023, 032, 033 and 053 is again fixed and dismissive when it recognises :

"Chapter 6: Landscape and Visual Amenity [EN010153/DR/6.1] does identify significant residual adverse visual effects, but only for the users of the PROWs that pass through the Proposed Development. No significant effects are predicted for any residential properties. These effects cannot be further mitigated through the mitigation hierarchy. Paragraph 5.10.13 of National Policy Statement EN-1 acknowledges that major energy projects are "likely to have visual effects for many receptors around proposed sites".

What Cubico's response does not say is that EN 1 also states in clause

5.10.4 Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement - and in clause

5.10.6 Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

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Since then, Cubico submitted its application to the Planning Inspectorate in June 2025 which invited people/organisations to register as 'Interested Parties' to the examination process. Fifty one did so and registered their comments. Of these, 16 'Interested Parties' stated that they were very concerned about the impact on the landscape which indicates that this matter is the No. 1 priority to be addressed from the community's perspective.

My contention is that :

1. Cubico have shown no consideration for the local community's views or needs by dismissing them when they state they conclude : "that visual effects would not be significant." This is both disingenuous and untrue.

2. Cubico have dismissed proposals to screen the panels with planting when they state that "planting for screening would not be effective given the change in elevation."

3. Cubico have made no attempt in their design to soften what will be a brutally unnatural appearance of the marshes as viewed from Frodsham & Helsby hills.

Recognising the importance of this to the community a review of Table 1 in Cubico's Design Parameters Statement discovered that rows of panels are up to 4m high, can be as close as 2m and will be angled at between 100 – 350 to the horizontal. A 7m high screen of trees could be positioned in front of the the front row of panels. As trees naturally have different sizes & shapes, suitably shaped trees would need to be placed in front of each block of arrays such that a 200 angle was maintained.

Importantly, the viewing angle from Frodsham hill is only 5.50 for the nearest array of panels, a row of 7m high trees would screen from view approx. 30 m of the panels behind the front row of panels. This screening benefit would increase to approx. 70 m for the most distant panels and the extent of screening would be approximately double when viewed from Helsby hill.

I believe that the monotonous unnatural views presented from the hills by huge blocks of industrial looking black/grey arrays should be mitigated as suggested in feedback. See FS2\_OFF 066 : "Respondent suggested hiring a specialist in aesthetics to make the solar farm look more appealing." Cubico deflected this comment and submitted a design in the application which appears unchanged and still brutal. Strengthen be reference to Design parameters.

I think that major changes are required and could be achieved by :

1. Use of natural screens of trees, bushes and shrubs in front of each section of panels
2. Varying the heights of the natural screens over a range of 4 – 8m and also varying the distances from the front of the panels and the width of the screens.
3. Frequently softening the straight lines of the rows of panels.
4. Leave open areas within the largest sections and create small copses of trees and bushes.

There would of course be supplementary benefits of making the changes proposed as only would they encourage and maintain or increase active travel but the necessary increase in shrubs and trees required but would support a significantly higher level of biodiversity.

Thanks,

Chris Copeman Ward Councillor for Helsby, Cheshire West and Chester Council