

My comments on the Applicant's responses (in REP6-070) to my Open Floor Hearing statement REP6-106 (Linda Twohey)

**I asked the Applicant to clarify what route construction traffic would take to access fields AF2,3 and 4 to erect ground-mounted solar arrays.**

Their answer:

*Fields AF2 to AF4 will be accessed via internal tracks from Access A-1 (West), and an existing bridge over the stream will be utilised to connect Field AF9.*

*During construction, vehicles accessing the western area will enter from Broughton Road and travel via internal tracks to the crossing point. The types of vehicles using the crossing may include HGVs, LGVs, cars and shuttle buses.*

My comments in response:

- 1) I have attempted to ascertain the situation regarding the bridge across the watercourse. I cannot access any of these fields directly as they are private property, but viewing from various points along Newland Road and the Broughton Road shows that the watercourse is within a deep channel with abundant vegetation surrounding it, and is fenced off on both sides. However, satellite images show that there are tracks which lead between opposite sides of the 2 smaller watercourses between AF9 - AF7, and AF7 – AF8. It is not possible to substantiate the state of any bridges, but any existing will not have been made to support HGVs, as the Applicant states would use them. Tractors weigh up to a maximum of 10 tonnes, HGVs are typically 32 tonnes.

- 2) The satellite images I have seen also show clearly track routes made by farm vehicles around these fields, AF2,3, and 4. These images show that at present these fields are accessed from the Broughton Road, where a farm track already exists.
- 3) There is no logic in the Applicant's choice to construct new tracks for HGVs through fields which are designated on CR2-008 for 'existing vegetation to be retained and enhanced' (AF7,8) and for 'damp grassland' (AF5), instead of just improving already existing farm tracks on a much shorter and direct route from the Broughton Road Access A-2.
- 4) Their choice of route will cause unnecessary significant harm to a proven ecologically important watercourse, and result in unnecessary significant disruption and disturbance to the designated Quiet Lane, Newland Road, so important to the villagers for recreation.

**As in my OFH2 submission, REP3-114, I asked for justification for not using Access A-2 on the Broughton Road near Old for construction in these fields, the obvious and much shorter route.**

The only justification they have produced in answer to both my OFH submissions is:

*Access A-2, Broughton Road, is proposed for operational use only and will not be used during construction. This reduces the risk of disturbance to skylarks within AF1, which will be retained as a mitigation field.*

My comments in response:

- 1) On map CR2-008, it can be seen that the access track route from Access A-2 starts in field AF1, but after a short stretch turns into AF2, and then through AF2 to AF3 and 4. Any access route coming from Access A-1, would have to travel

through fields AF29, across Newland Road, then presumably through AF10, AF9, across the 2 parts of the watercourse, and at least AF6 to reach AF4. This is a much longer route. With reference to APP-091, page 102, the Indicative Skylark Territory cores are shown across all these areas, and so many more skylarks would be disturbed by their proposed route than my alternative.

- 2) Field AF1 is a very large field, and by their own determination, skylark territories can be ‘absorbed’ by slight displacement (see APP-091):

*‘Absorbed’ territory cores relate to territory cores which, though displaced, are nonetheless judged to be able to persist within the operational Site due to the presence of adjacent suitable nesting habitat and the improvement of the carrying-capacity of that adjacent habitat conferred by the presence of permanent grassland (and so a richer foraging resource) within the solar array.*

So by their own methodology, their answer is not justified.

- 3) Archaeological surveys in Site A have shown significant probable Iron Age and Roman artefacts on magnetometer data in field AF1. (See APP-129) This field has been listed as being for skylark mitigation, but has presumably been chosen (amongst all the other possible fields) because it can double for important archaeological protection issues.
- 4) The extra stretch of the Broughton Road from Access A-1 to Access A-2 passes the residence of the landowner of Site A, but no other residential properties. This is the only reason I can deduce for the Applicant’s illogical judgment on this decision. They do not cite any Highway Authority reasons or any objections from, for example, villagers in Old.

**I postulated that if my suggested access route for construction in fields AF2,3 and 4 was used, for all the reasons**

**already enumerated, then removing the very small field AF9 from solar array usage would result in no need for any construction vehicles to cross Newland Road at all, with the only disturbance required being that of cable route connection across to the east side of Site A.**

They have not responded in any way to this element of my OFH submission, and most particularly, have not stated that this reduction in potential energy generation would be a problem for the viability of this part of the scheme. So I presume therefore that it would not be.

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