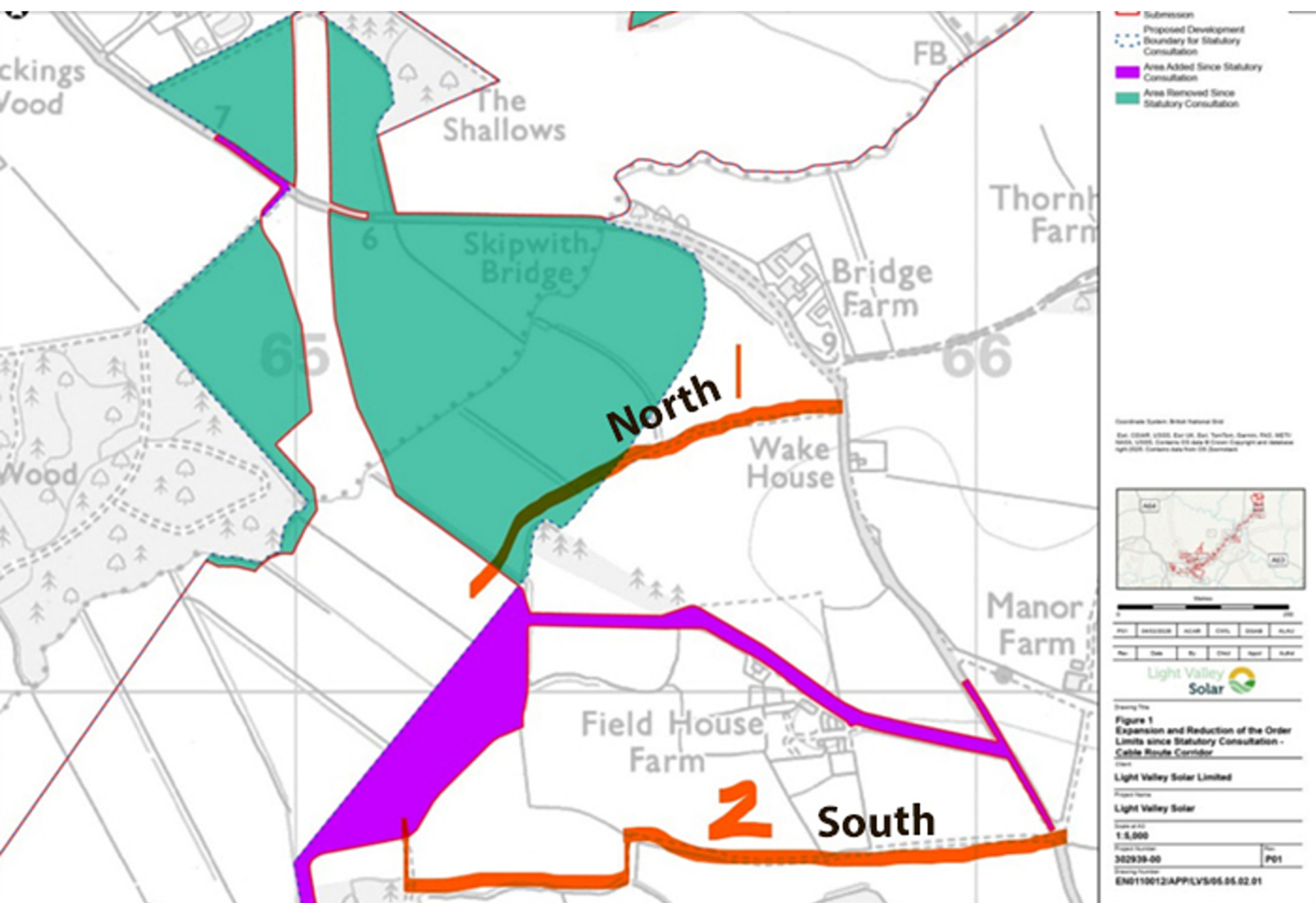




Good afternoon. My name is [REDACTED] and I am speaking on behalf of Wendy Tomlinson of Field House Farm.

I am a regular visitor to Field House Farm and know the property, its businesses and the surrounding area well.

Wendy supports the need for renewable energy, but she has concerns about the use of productive agricultural land for large-scale solar development. Her concern today is whether the Applicant has demonstrated a compelling case for acquiring compulsory rights over the access lane and adjoining land at Field House Farm when other less harmful routes are available.

Field House Farm is an occupied home and an established rural business comprising an adults-only caravan site, holiday accommodation, a caravan and motorhome storage business, and agricultural activities.

The proposed access lane is narrow and already serves residents, holiday guests, storage customers, delivery vehicles, pedestrians, and existing farm and business traffic. It also contains, or runs alongside, essential infrastructure and operational features serving the property and businesses, including the overhead mains electricity supply, buried fibre-optic cable, mains water and telephone infrastructure, security arrangements, long-established parking, refuse collection points and mature vegetation.

These existing uses and constraints are directly relevant to whether compulsory rights over this particular lane are necessary and proportionate. It is the sole access to an occupied home and several established businesses. The lane has been maintained and controlled by Wendy's family since 1966 and is already subject to substantial private and business use.

The concern is not simply the number of construction vehicles proposed. It is the effect of introducing construction traffic onto the sole access serving an occupied home and several established businesses.

There would be potential conflict with pedestrians, guests arriving or leaving with caravans / motorhomes, storage customers collecting or returning vehicles, delivery vehicles, and normal farm and business traffic.

The effects would also extend beyond vehicle movements. Construction activity could bring noise, dust, debris, vibration and operational disruption over a prolonged period. Dust is a particular concern for the caravan and motorhome storage business, while the tourism businesses depend upon peace, tranquillity and reliable access.

Guests choose Field House Farm precisely because of its quiet rural setting, wildlife and tranquillity. This is consistently reflected in more than 1,250

published guest reviews across the businesses, together with an overall rating of 4.9 out of 5.

A guest who arrives expecting a peaceful rural stay but instead experiences construction traffic, noise, dust or access difficulties may not return and may leave a poor review. This could have a direct and lasting effect on the reputation and future success of the businesses.

There are also security concerns. The lane is monitored because of previous incidents, and unfamiliar people or vehicles naturally require investigation.

These impacts are relevant to compulsory acquisition because they demonstrate the degree of interference that would result from choosing this particular route. They reinforce the need for the Applicant to show that the rights sought are genuinely necessary and that less harmful alternatives have been properly assessed.

Despite the lane having been maintained and controlled by Wendy's family since 1966, there was no early direct approach to discuss the proposed use of the lane, the rights being sought or the practical implications for the home and businesses it serves.

The Applicant's additional response to Wendy's Relevant Representation was received only yesterday, immediately before this hearing, despite the document stating that the representation had been provided to the Applicant by the Planning Inspectorate on 6 July.

This has given Wendy and her professional advisers no reasonable opportunity to consider the response fully or prepare a detailed written reply before the hearing. The points raised today are therefore necessarily preliminary, and Wendy reserves the right to respond more fully in writing at the appropriate Examination deadline.

The Applicant's response nevertheless raises several important matters directly relevant to compulsory acquisition.

In response 1444-09, the Applicant acknowledges that Wendy has not granted the rights sought and that it is still seeking a voluntary agreement.

However, no agreement has been reached. Wendy's land agent has not been paid, despite repeated assurances that reasonable professional fees would be met, and no substantive meeting has yet taken place to resolve the rights sought or the availability of alternative routes.

In responses 1444-01 and 1444-08, the Applicant says that trees and vegetation are "not anticipated" to be felled, although pruning may be required.

That does not amount to a firm assurance. “Not anticipated” does not rule out felling or substantial reduction.

It is also unclear why rights are required over the corner of Wendy’s adjoining field. Combines and other large agricultural vehicles have previously negotiated the lane without needing to enter that land.

The Applicant should therefore explain precisely why plots 03-009 and 03-010 are required, what works would be undertaken there, whether any vegetation could be felled or substantially reduced, and how the normal agricultural use of the field would be protected.

Separately, the Applicant should confirm how any pruning or removal of vegetation near plot 03-008 would avoid exposing or compromising the security equipment located beside the lane.

In response 1444-02, the Applicant says that its records show no water or telecommunications apparatus intersecting the relevant plots.

Wendy can confirm that Field House Farm has a mains water supply, telephone infrastructure and fibre broadband. Several fibre access chambers are plainly visible within or beside the lane.

This raises concern that the Applicant is relying on incomplete utility records rather than properly verifying the physical constraints on the land over which it seeks compulsory rights.

The response also refers to plot **03-008a**, but it remains unclear to Wendy exactly where that plot lies. The Applicant should provide clear plans identifying all land and rights sought and the infrastructure believed to be present within each plot.

In response 1444-05, the Applicant confirms that its Transport Assessment assessed road safety only on the public highway network. It relies instead on a banksman to manage movements along the private lane.

However, it has not identified any proper survey of existing lane use.

Wendy’s own monitoring shows between **9** and **57** movements per day. By comparison, the neighbouring alternative routes serve predominantly agricultural land, generally experience only a few movements, and cross land owned by a landowner whose land is proposed for the solar development.

Without an accurate baseline, it is difficult to understand how the Applicant can demonstrate that compulsory rights over this particular lane are necessary and proportionate.

The Applicant should identify what surveys or assessments were undertaken on the alternative routes, when they were carried out, what existing movements or constraints were recorded, and how that evidence was taken into account when rejecting those alternatives in favour of the Field House Farm access.

The Applicant also states that it has worked collaboratively with Wendy and refers to meaningful engagement and further meetings.

That does not reflect Wendy's experience. There were at least four project-related visits without agreed advance notification, despite previous requests for warning, and no substantive meeting has yet taken place to resolve the proposed acquisition of rights.

Field House Farm includes a caravan and motorhome storage business, so unfamiliar vehicles or individuals near the lane and storage yard create a genuine security concern. Because such premises may be observed in advance of attempted thefts, Wendy cannot safely ignore unannounced activity.

On those occasions, she had to stop her work and establish who was present, why they were there and whether they were authorised. The Applicant's representatives later acknowledged on several occasions that the agreed notification process had not been followed.

This is relevant because the survey stage involved relatively limited activity. If communication and coordination have already proved unreliable, it raises legitimate concern about how a much more intensive construction operation would be managed if compulsory rights were granted.

It is also relevant because the Applicant relies on its attempts to reach voluntary agreement. At present, those attempts do not appear to have progressed sufficiently.

There are also ecological constraints close to the proposed access. Barn owls breed nearby, and the surrounding hedgerows, trees and field margins are used by bats and other wildlife.

These matters are not raised as separate objections in this hearing. They are relevant because they add to the potential harm caused by choosing this particular route and therefore to the question of whether compulsory acquisition is necessary and proportionate.

The central issue is why compulsory rights are required over this particular access and adjoining field when alternative routes appear to exist to the north and south of Field House Farm.

Those alternatives are predominantly agricultural, experience substantially less existing traffic, have no known visible infrastructure constraints, and would avoid acquiring rights over the sole access to an occupied home and several established businesses.

As Wendy understands it, highway mitigation or improvement works may be required regardless of which access route is selected. If that is correct, the need for such works should not, by itself, justify acquiring compulsory rights over the Field House Farm access where a less harmful route may be available.

The Applicant states that alternatives were considered, but it has not provided a clear comparative assessment explaining:

- What alternative routes were examined?
- What engineering, land, access and environmental considerations were applied?
- What surveys or measurements were undertaken for each route?
- Why each alternative was rejected?
- Why compulsory rights over Field House Farm represent the least harmful and most proportionate solution?

The existence of a convenient route is not, by itself, sufficient justification for compulsory acquisition.

Before compulsory rights are granted, the Applicant should be required to demonstrate that the land and rights sought are genuinely necessary, that there is a compelling case in the public interest, and that reasonable alternatives causing less interference have been properly considered and ruled out.

At present, that case has not been demonstrated.

I therefore respectfully ask the Examining Authority to scrutinise:

- The necessity for rights over plots 03-008, 03-008a, 03-009 and 03-010?
- The need for the adjoining field corner?
- The adequacy of the Applicant's utility and access information?
- The likely interference with the home and established businesses?
- The assessment and rejection of alternative routes?

Field House Farm is a particularly sensitive receptor because of the unusual concentration of residential, tourism, storage and agricultural interests dependent upon the same sole access.

Wendy's wider concerns about the Proposed Development remain. For the purposes of this hearing, however, the immediate issue is whether compulsory powers over the Field House Farm access and adjoining land have been properly justified.

On the evidence currently available, Wendy does not believe that they have.

She therefore asks the Examining Authority not to grant compulsory powers over plots 03-008, 03-008a, 03-009 and 03-010 unless and until the Applicant has demonstrated a compelling case in the public interest, clearly justified the need for each plot, and shown that no reasonable, less harmful alternative route is available.

Thank you.