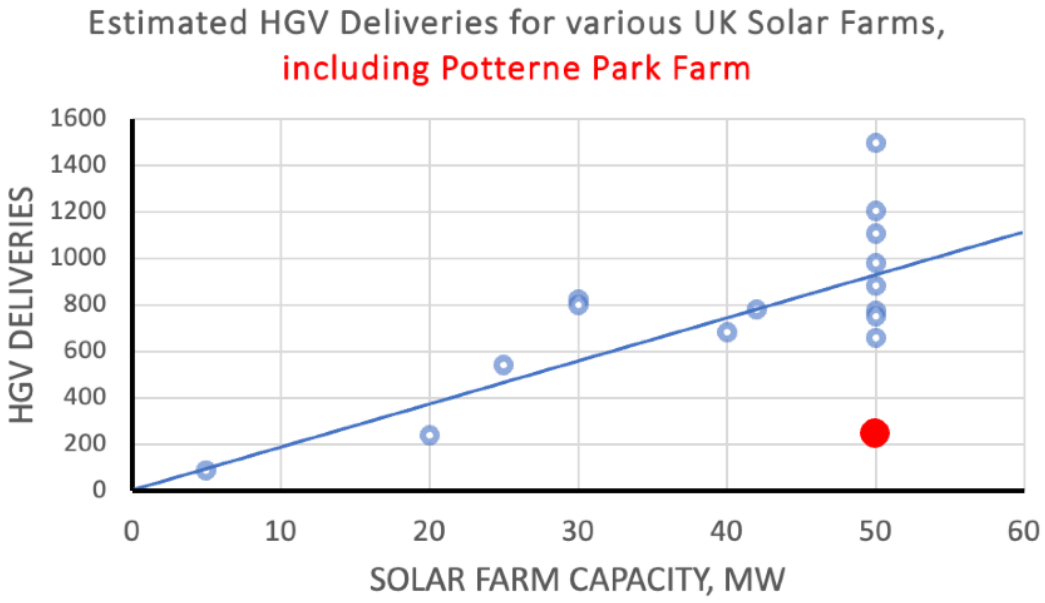
Potterne Solar Action Group - Points in response to Hydrock document registered on the planning portal 8th May 2025.

Dear Mr. James, Case Officer,

We appreciate the opportunity to respond to this latest Technical Note from Hydrock in response to a request for information from the Highways Officer. We notice that Hydrock's response includes a copy of a Technical Note already submitted to the previous Highways Officer on 7th March 2025. Why was this note not put in the public domain? - it is not registered on the planning portal. As you are aware, our community is very stressed by this application, and we ask once again that we have the opportunity to respond to any material documents exchanged between the applicant and the planning office – particularly because the applicant's information provided is invariably inaccurate.

Nothing in these Technical Notes alters the points we made in our recent comment WC-25-04-331048 of 14th April 2025 summarising the seriousness of the access issues. I take the opportunity to add to the points made in that comment (section numbers relate to my comments of 14th April).

1.Vehicle Numbers – we note that, incredibly, Hydrock are standing by their claim that this site can be constructed by 245 HGV deliveries. This is despite logistics expert Luke Wilson (WC-24-08-308163) pointing out that these figures are grossly understated. We have now undertaken a review of other planning applications to prove our point, and the following table demonstrates that these figures are wildly out of line with industry predictions.



A linear regression of HGV deliveries would suggest 929 during the construction phase of a typical 50 MW solar farm - almost 4 times the quoted 245 HGV deliveries for PPF. The table supporting this graph is given in appendix 1.

Why are Hydrock not providing relevant numbers for Potterne Park Farm? We are left with 2 possible conclusions to this question – either they do not know what they are talking about, or they are seeking to mislead your office and the public. Given that we are now in the fifth consultation round, Hydrock have had plenty of opportunity to correct this situation and provide clarity.

Hydrock appear to have used this approach with planning applications before. A "Technical Design Note" written by Hydrock on 16th March 2021 concerning Green Farm Solar (20/01182/FUL – Melton Borough Council) shows that the consultation process, including discussions with the LHA, questioned Hydrock's underestimating of HGV traffic. In the Transport Statement Addendum (see Appendix 2 below) Hydrock admit their initial estimate of HGV movements (482 movements, 241 deliveries - taken from the 2014 Aston Farm data) was too low for a 50MW farm. They increased it to 1600 HGV movements, 800 deliveries – increasing the construction period from 6 weeks to 25 weeks. This correction was over 2 ½ years BEFORE preparing the Potterne Park Farm CTMP in December 2023. We question why this learning has not been taken into account in their professional practice and see this continued understating of vehicle numbers as totally unacceptable - as it will inevitably mislead authorities. In addition, we question why Lighthouse who are supposed to be overseeing the PPF application have not sanity-checked the numbers.

In our opinion, both Hydrock and Lighthouse know perfectly well that the vehicle numbers submitted in relation to PPF are grossly understated and Appendix 2 proves it. The only conclusion that can be drawn from this fact is that they are seeking to mislead the authorities.

Presumably it now falls on your planning office to make decisions based on vehicle numbers using your own calculations, because the applicant cannot be trusted to provide accurate figures. Even at 245 deliveries, we do not believe this access route is safe, and the truth of the likely vehicle numbers is more like 4 times bigger! Note that these figures are HGV deliveries only, and do not include LGV, cars, smaller deliveries – for example there will be 40-50 people attending site during construction.

We seek assurances from your office that decisions will be based on fact, which in this instance means credible numbers.

2. Resident's access – The mitigation for residents set out in section 3 of the Technical Note is unrealistic and does not meet the access rights set out in our comment WC-24-02-294524. They also do not meet, in our opinion the six tests of para 56 of the NPPF. It is "unreasonable" to expect residents to contact marshals to come and go from their own homes. Furthermore, the applicant is implying that the vehicle numbers involved will be *"similar to"* the occasional tractor that uses the lane now. (3.1.3 of the technical

note). Given the understatement of numbers of HGV movements described in point 1 above this is not a "reasonable" comparison.

3. Emergency Access – there is no secondary access for emergency vehicles. No amount of Marshals can mitigate this point.

4. Illegal use of PRoW – There is now no mention at all of the 2 PRoW's that make up the access route. This route is for agricultural use only and as mentioned in our 14th April comment, semi-industrial use has been declined on previous planning applications.

5. Passing Places – there are no suitable passing places. Of the 2 passing places suggested, one is at the entrance to the scout's field. We are in the process of checking ownership of this field and it is unlikely permission will be granted.

6. Access to A360 – apart from the mention of a marshal at the A360 junction there are no details of how traffic is actually going to be managed. A single marshal on a blind bend of the main Salisbury to Devizes road is putting the safety of the said marshal at risk, as well as other road users.

7. Other points

7.1 Road Mats – The use of protective matting to protect the verges is unrealistic on a road such as this – the road floods. The planning officer for the solar farm site at Kimblewick in Buckinghamshire (23/02077/APP) rejected this suggestion from Hydrock on that planning application because these mats present a skid risk. The same applies here.

Also, mats cannot be placed where there is insufficient verge on either side of Potterne Park Lane and the applicant has not addressed this fact. The lane requires major improvements to its present condition… something which would be apparent and could NOT be argued with, if the consultants had visited the site. 2 Mats will NOT protect/secure the gulleys which have been mentioned in several public comments as a severe health and safety risk to pedestrians, residents and drivers of the HGVs!

Figure 2 of Hydrock's Technical Note (27643-HYD-XX-XX-RP_TP-1002-P02) implies ownership control of both sides of the lane south of the bridge. The deeds of Cadley Farm (see appendix 3 below) calls this claim into question. The applicant will need to prove ownership of the verges where mats will be deployed. Any encroachment or "oversail" of land not owned by the applicant will be contested. The same applies for the bridge, as landownership by the applicant can only be claimed on one corner of the bridge.

7.2 Our Legal position

There are at least 3 grounds for us to take legal action on the topic of access alone.

- We have already registered under comment WC-24-02-294524 that a legal challenge will be forthcoming to defend access rights for residents that use the private road as their only means of access. This will also apply to proposed use of land not in the landowners/applicant's control (see 7.1 above)

- In addition, Potterne Parish Council stated in their comment WC-24-02-293920 (5.7 Breach of Duty) that "If this application is approved the highway authority will automatically breach its duty under s.130(1) Highways Act 1980 to '*assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority*".

- Following the continued misrepresentation and understatement of vehicle numbers, we are also seeking legal opinion regarding a decision based on vehicle numbers that both the applicant and the LPA know to be wrong.

In our view, the applicant continues to mislead the LPA in providing inaccurate information and thereby downplaying the dangers and the total impracticality of using this lane for access. We therefore stress again the need for the LHA to verify any numbers and plans submitted by the applicant and the importance of visiting the site as a pre-requisite to decision making.

Steve Holt
PSAG

Appendix 1: Data table for sites

Solar Farm	Capacity, MW	Estimated HGV Deliveries	Reference/link
Long Hedge Solar	50	1106	http://www.longhedge-solarfarm.co.uk/media/2642405/vol-3-ta-5-ctmp-final.pdf
Varley Farm Solar	25	540	https://www.varley-solarfarm.co.uk/media/2642447/p22_07114_f-construction_traffic_management-7572831.pdf
Pelham Solar	50	660	https://assets.publishing.service.gov.uk/media/64074f0fe90e0740dc92d251/App_response_6_March_2023_-_Construction_Traffic_Management_Plan_-_Rev3_Redacte
Beane Solar	50	1500	https://www.beane-solarfarm.co.uk/media/se5puw44/jny11727-03b-beane-solar-ctmp.pdf
Derrilwater Solar	42	783	https://www.derrilwater-solarfarm.co.uk/media/2640084/vol-3-ta-5-ctmp.pdf
Chimmens Solar	50	1207	https://www.chimmens-solarfarm.co.uk/media/2tujbxvk/construction-traffic-management-plan.pdf
East Stour Solar	50	774	https://www.edf-re.uk/wp-content/uploads/2022/07/East-Stour-ES-Volume-2a-Chapter-8-Transport-and-Access.pdf
Leaford Solar	30	825	https://leaford-solarfarm.co.uk/media/s1qjeh24/leaford-solar-farm-ts-v3.pdf
Glyntaff Solar	40	684	https://glyntaffsolar.co.uk/wp-content/uploads/sites/121/2025/03/Annex-3-Construction-Traffic-Management-Plan.pdf
South of Berringham	30	801	https://www.shropshire.gov.uk/media/27418/cd-111-transport-statement-ctmp.pdf
Moneystone Quarry	5	86	http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=101918
Alfreton Solar Farm (Kronos)	50	752	Amber Valley Borough Council Planning Portal (AVA/2020/1224). Transport and Construction Mgt Statement Nov 2022
Roundhill Wood Solar	50	883	Wythavon District Council Planning Portal (W/23/00270/FUL) P19-0753_TR_01_CTMP_JAN23 Issue.pdf
Aston House Farm	20	241	Derbyshire Dales Planning Portal (14/00450/FUL) Transport Statement July 2014
Foxholes Farm Solar	50	980	Newark and Sherwood Planning Portal (5722/01983/FULM) Construction Traffic Mgt Plan Oct 2022
Potterne Park Farm	50	245	Wiltshire Council Planning Portal (PL/2023/10332) Construction Traffic Management Statement June 2024

Appendix 2 :

Hydrock - Technical Design Note related to Green Farm Solar Development

See:
Section 1.1.5 – Summary of Consultation Process
Section 3 – HGV Vehicle Movements

Note: Appendices A and B have not been included as they are not relevant to HGV vehicle movements

TECHNICAL DESIGN NOTE

Hydrock

Project name	Green Farm Solar Development		
Design note title	Transport Statement Addendum		
Document reference	16421-HYD-XX-XX-RP-TP-1001-P1		
Author	Sophie Gittins BSc (Hons)		
Checked	Chris Peachy BA (Hons)/ Sam Denby BA (Hons), MSc, CMILT		
Revision	P1 - Final		
Date	16 March 2021	Approved	✓

1. INTRODUCTION

1.1 Overview

1.1.1 This Transport Statement Addendum [TSA] has been prepared to provide a response to feedback received from the consultation process relating to Planning Application No. 20/01182/FUL.

1.1.2 Planning Application No. 20/01182/FUL proposes the installation of a solar farm with a 49.9MW output for a period of up to 40 years, including battery storage units, associated infrastructure, permanent grid connection hub and environmental enhancements on a circa 74-hectare site.

1.1.3 Hydrock have produced a Transport Statement (dated 15th October) in support of Planning Application No. 20/01182/FUL for reference.

1.1.4 The development is situated approximately 1.7km north of Barkestone Village, approximately 3.3km, north east of Plungar and approximately 3km south east of Granby. Jericho Lane borders the site to the south west and Belvoir Road to the north east. The development is accessed via Flawborough Lane, located off Plungar Road.

1.1.5 The comments received from the consultation process are summarised as follows:

- *Concerns over the applicant's submissions on traffic and access (vehicle routeing); and*
- *Concerns on the submitted evidence on HGV movements as set out in Hydrock's Transport Statement.*

1.1.6 This TSA has been prepared to address the aforementioned feedback received from the consultation process and to demonstrate that the proposed Green Farm development can be accommodated and accessed without detriment to the local highway network.

2. HGV HIGHWAYS ROUTEING

2.1.1 As previously stated, the comments received from the consultation process highlighted initial concerns over the applicant's submissions on traffic and access (vehicle routeing) to the site.

2.1.2 The previous routeing strategy proposed all construction traffic to be routed from the west via Granby village.

2.1.3 Following discussions with Nottinghamshire County Council [NCC] Highways, clarification was received that the proposed routeing through Granby village is not possible as it would extend via an Environmental weight limit [EWL]. A copy of the NCC highways response can be found in Appendix A.

2.1.4 The feedback received from the consultation process also highlighted the following:

" The proposed means of access from the A52 to the development site to be unsuitable for *the following reasons:*

- *(i) it requires all HGVs to enter and exit through a 7.5T weight limit either side of Granby village, presumably in violation of the relevant Order;*
- *(ii) Flawborough Lane (aka Gypsy Lane) over some 1.8km (1.2miles) and being a narrow, unmade BOAT shared with pedestrian and equestrian users, is unsuitable for the extensive construction traffic to the development (notwithstanding the marginal 'mitigation' proposed).*"

2.1.5 Therefore, taking the above comments into consideration, the HGV routeing has been reconsidered based on the environmental constraints across the local highway network, including consideration into the environmental weight restrictions either side of Granby Village.

2.1.6 The revised HGV routeing strategy includes the decanting of larger HGV vehicles at the substation location which is situated off Castleview Road, to the north east of the site. It is proposed that HGVs will access the substation via the A52 Bottesford Bypass from the east and west and then turning south onto Castleview Road.

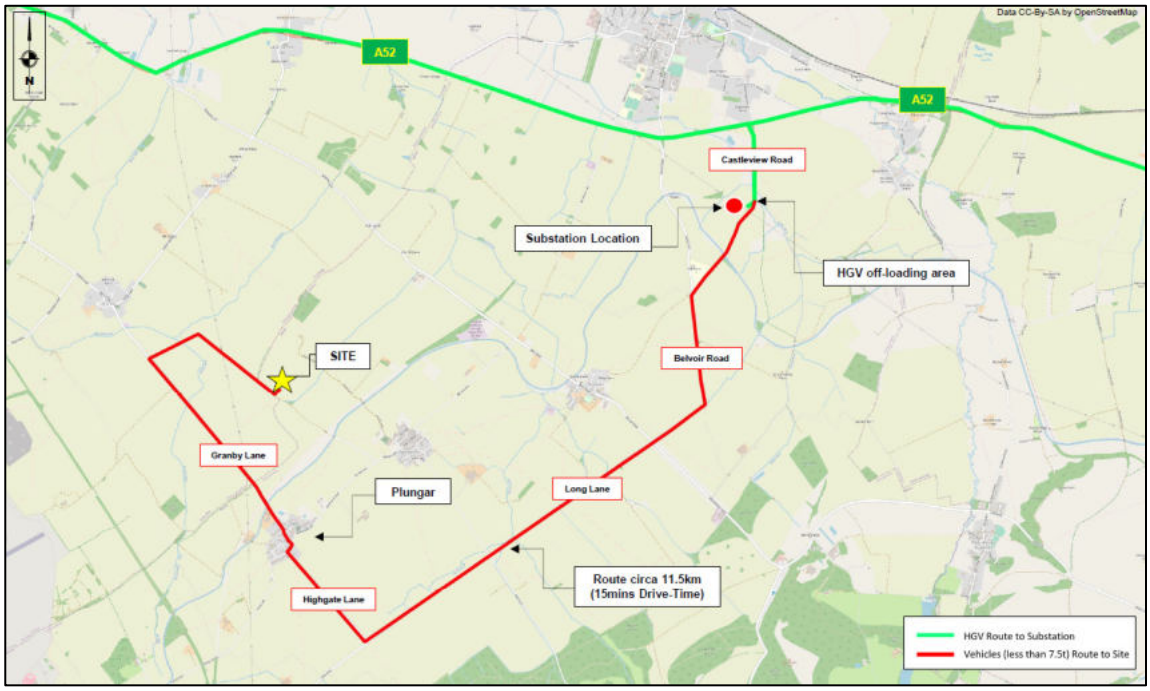
2.1.7 The HGVs are proposed to extend in a southerly direction on Castleview Road for circa 750m whereby the vehicles would off-load at the substation and transfer loads to smaller vehicles such as the 11.5m rigid truck. The smaller vehicles would then travel in a south westerly direction to the proposed Green Farm development for a circa 15-minute drive-time.

2.1.8 All construction vehicles will enter and exit the site in forward gear. A construction compound will be provided within the substation site, where vehicles will be able to turn. Within the fields of the substation, temporary access tracks may be laid to enable the support of the loading of HGVs and plant. Any temporary access track will be removed upon completion of the construction phase.

2.1.9 This revised routeing is deemed appropriate as HGVs over 7.5t will not enter the aforementioned 7.5T environmental weight limit restrictions. In addition, the A52 Bottesford Bypass/ Castleview Road T-Junction comprises large visibility envelopes to the east and west, with a 29.0m wide bell mouth and junction radii of 14.0m to the east and west.

2.1.10 Figure 2.1 below illustrates the proposed HGV routeing plan, which can also be found in Appendix B for reference.

Figure 2.1: Proposed Revised HGV Routing via Substation



Source: OpenStreetMaps©

2.2 Summary

2.2.1 In summary, Hydrock feel the use of the substation location off Castleview Road as a decanting area for larger vehicles to off-load onto smaller vehicles (less than 7.5t) satisfies the comments received from the consultation process and would not breach the EWRs across the local highway network. Therefore, Hydrock feel this comment has been satisfied.

3. HGV VEHICLE MOVEMENTS

3.1 Overview

3.1.1 The justification for Hydrock's total HGV vehicle movements was extracted from a similar Solar Farm development in Uttoxeter Aston House Farm, Derbyshire Dales (Planning Ref: 14/00450/FUL). This solar farm development was based on a 45-hectare site with a 20MW size.

3.1.2 Taking into account the comments received from the consultation process and the comparable examples discussed below, the following section of this TSA presents a revised trip generation methodology, providing justification that even with increased total HGV movements, the impact on the local highway network would remain immaterial and the conclusions unchanged.

3.2 Consultation Feedback

3.2.1 Feedback from the consultation process has highlighted concerns on the submitted evidence on HGV movements in and out of the proposed development.

3.2.2 It has been commented that in comparison to projects of a similar scale and size to the proposed Green Farm development, the number of HGV movements predicted for the proposed Green Farm development is lower for both the delivery of Solar Panels and Mounting Frames and total HGV trips.

3.2.3 Contained in the comments from the consultation process was a table of comparisons as supportive evidence of the total HGVs required for the construction of solar farms of a similar size and scale to the proposed development.

3.3 Hydrock's Response

3.3.1 Hydrock have extracted and examined three of closest comparable solar farm developments that were provided as comparable evidence in the feedback from the consultation process. These three solar farm sites are illustrated in **Table 3.1** below.

Table 3.1 Comparison with other solar farms

Site	LPA Area	LPA App Ref	Area (has)	Size (Mw's)	HGV Panels	HGV Frames	HGVs Total	Const'tion Period
Grange Farm, Inkersall	Newark/S DC	19/01165	79.5	49.9	170	100	1240	25 Weeks
The Grange, Hawton	Newark/ S DC	19/01408	102.9	49	170	100	1240	26 Weeks
White Cross, Sleaford	N Kesteven DC	19/0863	50.3	32	167	128	1264	20 Weeks
Proposed Development (Green Farm)	Melton BC	20/01182	74	49.9	115		482	6 Weeks

Average Daily HGV Movements

3.3.2 Contained in the associated transport documentation for the aforementioned three comparable solar farm developments, there is also an average anticipated number of HGV movements per day provided within each report.

3.3.3 Within the Transport Statement produced by Hydrock, there is confirmation that all deliveries for the proposed Green Farm development will arrive within a six-week period. This equates to, on average, around eight deliveries (16 movements) per day by the largest vehicle.

3.3.4 Hydrock have undertaken a further calculation of the number of anticipated vehicular trips **per day** for the three comparable sites by using the anticipated length of construction period and associated operational hours, as illustrated in **Table 3.2** below.

Table 3.2: Anticipated HGV vehicular trips per day - Comparable Sites

Site	Construction Period	Operating Hours	Operating Days	Total HGVs	HGV trips per Day provided in accompanying documents (Average)	Hydrock's Calculated provision of HGV trips per day (Average)
Grange Farm, Inkersall	25 weeks	Monday to Friday 08:00-18:00hrs Saturday 08:00-13:00hrs	5.5	1240	15 deliveries per day (30 HGV movements)	**9 HGV movements**
The Grange, Hawton	26 weeks	Monday to Friday 08:00-18:00hrs Saturday 08:00-13:00hrs	5.5	1240	15 deliveries per day (30 HGV movements)	**9 HGV movements**
White Cross, Sleaford	20 weeks	Monday to Saturday 08:00-18:00	6	1264	20 deliveries per day (40 HGV movements)	**10 HGV movements**
Proposed Development (Green Farm)	6 weeks	Monday to Friday 07:00-19:00	5	482	8 deliveries per day (16 HGV movements)	**16 HGV movements**

3.3.5 The calculation undertaken to produce Hydrock's anticipated HGV vehicular trips per day is as follows:

$$\frac{Total\ HGVs}{(Construction\ Period\ x\ Operating\ Days)}$$

3.3.6 On this basis, Hydrock would assert that the daily vehicle trip generation associated with the proposed Green Farm development, in comparison to the above solar farm developments is not deemed to be inaccurate as the comparable examples range between 9-10 average HGV movements per day over a longer construction period and the proposed Green Farm Development is an average of 16 HGV movements.

Total HGV Movements

3.3.7 In addition to the above, feedback received from the consultation process also included the following:

"It seems likely that there could be at total of some 800+ HGV deliveries involved in the construction of the Barkestone proposal (x 2 for total movements)."

3.3.8 Therefore, taking into account the above comment, Hydrock have undertaken further calculations to emphasise that even if the vehicle trip generation were to triple to the recommended 1600 total HGV movements suggested in the comment above, the development would still not have a material impact on the local highway network.

3.3.9 In addition, it is evident, with reference to the aforementioned three comparable sites, that the construction period for this scale of solar farm is circa 25 weeks.

3.3.10 Therefore, the revised calculation for the increase in total HGV vehicle trips and construction period is illustrated in **Table 3.3** below.

Table 3.3: Revised Total HGV Movements

Proposed Development	Construction Period	Operating Hours	Operating Days	Total HGVs	HGV trips per Day (Average)
Green Farm	25 weeks	Monday to Friday 07:00-19:00	5	1600	13 HGV movements

3.3.11 As illustrated in **Table 3.3** above, if the construction period of the proposed Green Farm development is consistent with the aforementioned comparable solar farm applications of 25 weeks, the number of daily average HGV movements is a modest 13 movements per day.

3.3.12 While Hydrock understand that any type of disruption to the local highway network would be unwelcomed, it is felt that a balance between a modest increase in traffic for 25 weeks to facilitate 40 years of renewable energy, is a reasonable trade-off.

4. SUMMARY AND CONCLUSION

4.1 Summary

4.1.1 In summary, this TSA has illustrated that in comparison to the other solar farms, the daily impact of the proposed Green Farm development on the local highway network is very similar to the comparable solar farm developments that was highlighted in the feedback received from the consultation process.

4.1.2 Hydrock feel that the initial HGV movements outlined in the Transport Statement produced by Hydrock, (dated October 2020) were justifiable, however were based on a smaller scale development.

4.1.3 Notwithstanding, this TSA has illustrated a revised trip generation methodology and justified that even if the worst-case scenario of 1600 total HGV movements over a 25-week period was considered for this development, the material impact on the surrounding local highway network would be minimal.

4.1.4 In addition, as previously stated, while Hydrock understand that any type of disruption to the local highway network would be unwelcomed, it is felt that a modest increase in traffic for 25 weeks to facilitate 40 years of renewable energy, is a reasonable trade-off.

4.2 Conclusion

4.2.1 Given the above information, it is concluded that Hydrock, acting on behalf of the client, has adhered to provide evidence to all of the aforementioned comments / concerns raised from feedback from the consultation process.

4.2.2 Hydrock therefore believe that it has been demonstrated that the proposed Green Farm solar farm development would not lead to a severe impact to either the existing or the future forecast capacity on the local highway network.

4.2.3 It is also again reiterated that the National Planning Policy Framework [NPPF] (February 2019) states that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

4.2.4 It is concluded that the development proposals are acceptable in highways and transport terms. There are no highways or transport related reasons upon which a refusal of the planning application would be justified.

Appendix 3: Deeds to Cadley Farm (Ownership in red)

