

Worlington Parish Councils Response to Sunnica's Applicant's Response to Other Parties' Deadline 4 Submissions

U6006	<p>The DCO under Temporary Road Closures says U6006 will be 'closed to all traffic save under the direction of the undertaker' 450m from the Worlington end for 70m, and 700m from the Freckenham end for 400m to enable cabling and other road works [1]. The small section in the middle of the lane can't be accessed, so effectively the lane will be closed completely as it will not be a through route. I therefore struggle to accept temporary works of three weeks will apply, it seems more likely to be closed for the entire 24 months of construction.</p>	<p>Mr Leitch's concerns are noted but the Applicant confirms that it will not close the U6006 for the entire period of construction.</p> <p>Construction works in this location are for the installation of medium voltage cables that will connect between the inverters in field E12 to E18 and from E24 to 32.</p> <p>There is also a requirement to construct and access road perpendicular to the U6006 to give access to fields E12.</p> <p>The construction schedule for the construction works (all working days) is:</p> <ul style="list-style-type: none"> <li>1- Break open asphalt (2 days);</li> <li>2- Trench opening by excavator. (2 days);</li> <li>3- Installation of cables. (2 days);</li> <li>4- Backfill of trench and resurface asphalt. (2 days);</li> <li>5- Public right of way opened for traffic (5 days)</li> <li>6- Inspection of asphalt for defect and repair and make good if need be. (1 day)</li> </ul> <p>On the basis of the above the U6006 will not be closed for any longer than 21 days.</p>	<p>Worlington Parish council would like more clarification in regards to the following points;</p> <p>1, The Applicants Enviromental Statment 6.2 Appendix 13C: Framework Construction Traffic Management Plan and Travel Plan (APP-118) drawing number 60589004_ES_CTMP_003 "HGV inbound route" shows Part if not all (hard to make out on the map) U6006 within the Sunnica East Site B, marked in red.</p> <p>Within the applicants Key this is listed as Indicative Construction Zone 24 months. It is also noted that all site access points are located south of U6006.</p> <p>Referring to the Applicants statement "There is also a requirement to construct and access road perpendicular to the U6006 to give access to fields E12."</p> <p>If this is the case, the footpath will be obstructed for 24 months not the 21 days stated.</p> <p>2, Asphalt. At present U6006 is a dirt track. Worlington Parish council now presume that the perpendicular access road, which we believe to pass through U6006 is to be laid with asphalt.</p> <p>Worlington Parish Council seek clarification.</p> <p>*Will Part of U6006 be accessible but no longer connect the villages of Freckenham and Worlington for 24months.</p> <p>*Will there be a 40+ year site access road crossing U6006.</p> <p>*Will the site access road to E12 be Asphalt.</p>
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<p>PRoW</p>	<p>Baddlingham Lane is a historical footpath linked to the Icknield way. It is used daily by our residents and those further afield. WPC are unable to see how the path will be fully accessible for the whole construction phase of the area. When it is reopened it will not be the same, solar arrays, high security fencing, flood lights and CCTV. The change of vista will be dramatic and WPC feel this route will be less frequented by its residents and in turn force them into driving to another area for their walks.</p>	<p>Chapter 12: Socio-economics and Land Use of the Environmental Statement [APP-044] assesses the impact on PRoW, including U6006 Badlingham Lane. The assessment identifies that users would experience temporary disruption during construction via temporary severance and subsequent diversion. The effect arising from this is assessed to be minor adverse at the Sunnica East Site B, which is not significant. The route would be reopened after construction and during operation.</p> <p>The Framework Construction Traffic Management Plan and Travel Plan [REP3A-004] identifies eight PRoWs which are required to be temporarily closed during the construction period. A short section of the route is required to be temporarily closed during the construction of the cable corridor for the cable to cross U6006. The closure is expected to be for a maximum of one week. Appropriate signage and warning will be provided regarding the temporary closure. Aside from the closure, the route will remain open for public use with no management required.</p> <p>Paragraph 6.3.10 of the Framework Construction Traffic Management Plan and Travel Plan [REP3A-004] sets out the Applicant's will seek to avoid PRoW closures with the preferred method being to use marshals to enable users of the PRoW to cross. However, this will need to be assessed on a case-by-case basis to ensure the health and safety of workers and users of the PRoW. As such, the ES assesses temporary closures, rather than managed crossings, for the purpose of a robust assessment, i.e. a worst-case scenario</p> <p>The intention is that temporary closures will be discussed and agreed with the LHA. Heads of Terms for a side agreement for highway matters were issued on 26 August 2022 by the Applicant to the local highway authorities. This relates to a proposed agreement which would set out the practicalities of the processes to be followed where the Applicant seeks to exercise the</p>	<p>For clarification, Worlington Written representation 2.5 pg9 - Badingham Lane is U6006 also known locally as green Lane.</p> <p>Environmental Statement 12.8.19          "Users would be able to use an alternative route via Freckenham Road." The applicants proposed alternative route is national speed limit with no footpaths between the Worlington – Freckenham Village signs. 1.8km without footpaths. Where U6006 dirt track through a wooded area across fields generally on foot, bike or horse back. The alternative route would cause a significant risk to life.</p> <p>The Framework Construction Traffic Management Plan and Travel Plan [REP3A-004] Reading this document highlights that U6006 is being treated as a road closure under para 6.3.1."The temporary road closures include the following" U6006 is listed here and not under 6.3.9 "The PRoWs to be closed are as follows:"Worlington Parish council would like to stress this is a dirt trackway used by foot, bike and horse riders. Though a car is permitted under UK byway laws we would advise against the suitability for four wheeled vehicles.</p> <p>Clarification is sort regarding the following statements which both refer to construction of a cable corridor on the same PROW U6006 as there is a discrepancy of 14 days.          "A short section of the route is required to be temporarily closed during the construction of the cable corridor for the cable to cross U6006. The closure is expected to be for a maximum of one week."This seems to be a different time frame for the one offered to Mr Leitch regarding the same PROW U6006.          "On the basis of the above the U6006 will not be closed for any longer than 21 days." Applicant's Response to Other Parties' Deadline 4 Submissions</p>
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	<p>powers contained in the DCO, if granted, in respect of highways. The Applicant looks forward to discussing the Heads of Terms with the local highway authorities in the coming weeks. Furthermore, a note on how PRoW closures will be dealt with has also been submitted at Deadline 5.</p> <p>Badlingham Lane passes between two rows of mature trees and dense vegetation, which enclose much of its length and screen views out to the wider landscape. Visual impacts on users of Badlingham Lane have been assessed in detail in Chapter 10: Landscape and Visual Impact Assessment of the Environmental Statement [APP-042]. Impacts were assessed with reference to four viewpoints (15, 15A, 15B and 16) representing sequential views along the route. Significant effects are predicted in construction and year 1 of operation, reducing to not significant by year 15 of operation, when proposed planting and existing deciduous vegetation would be in leaf.</p> <p>Mitigation of effects on users includes provision of substantial offsets and additional planting, proposed in places along the route to reinforce habitat connectivity and visual screening of solar panels in adjacent fields. Two new permissive routes around Sunnica East Site B are also proposed which will enable enhanced public access for recreation across the landscape. These include a new permissive route adjacent to Elms Road and around the perimeter of E19 and E22 which would link to PRoW U6006 and routes between Red Lodge; and a new permissive path across Sunnica East Site B, to provide access from U6006 across the north of Sunnica East Site B to connect with Golf Links Road.</p> <p>The Outline Landscape and Ecology Management Plan (OLEMP) [latest version submitted at Deadline 5] provides information on the proposed mitigation, including the Landscape Masterplan illustrated in Figure 3 and the Illustrated Cross Section in Figures 8 to 13</p>	<p>12.8.50          “To the north-east of the Site south of Freckenham Road (see Figure 12-6) there will be two new permissive routes intersecting the existing diagonal unclassified bridleway (U6006) (final location is subject to agreement with the landowner), during the operational phase of the scheme. One will create a loop to the western side of U6006, and the other creates a route to the east of U6006 to connect with Golf Links Road. These will provide a safe route for the use of local residents in the area during the operational phase of the Scheme, the impact is medium beneficial which results in a minor beneficial effect. This is not considered significant.”</p> <p>Worlington Parish council on <u>additional</u> PROW during operation:          * We feel crossing Newmarket Road within the 40mph zone where there are no footpaths curb side and set less than 100meters from 60mph zone is not a “safe route” option.          *the statement (final location is subject to agreement with the landowner) gives the impression that the landowner has either not been contacted or is yet in agreement.</p> <p>Paragraph 6.3.10 Framework Construction Traffic Management Plan and Travel Plan.          Worlington Parish council seek further information in regards to references of Paragraph 6.3.10. in regards to U6006.          “vehicles to cross the PRoW ” Will there be a crossing over the U6006 to gain site access?          “case-by-case basis ” Where can I find the information in regards to this case?          “the ES assesses temporary closures, rather than managed crossings ”          “worst-case scenario. ” What is the worst-case scenario in regards for U6006?</p>
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Bats	<p>The Parish Council comment on the results of their own bat surveys and consider that the Scheme will cause adverse impacts in light of them, particularly in light of the lack of information generally on the impacts of solar panels to bats generally.</p>	<p>The scale and types of impacts on bats are summarised in Table 8- 10 within Chapter 8: Ecology and Nature Conservation of the Environmental Statement [APP-040]. These include potential impacts to roosting, foraging and commuting bats from habitat loss and change, disturbance, lighting during construction and operation. This was assessed as not significant.</p> <p>The research around the general impacts on solar panels to bats, such as the collision fatalities due to bats</p>	<p>Worlington Parish council believe this application will be detrimental to the bat populations.</p> <p>Is there a link/ submission of the refereed to research? The research the applicant refers to here is out dated (2010) and therefore brings into doubt the relevance to such large scale developments.</p> <p>Natural England have a published paper on their website dated 2017, Evidence review of the impact of</p>

		<p>mistaking solar panels for water, concluded that bats have an innate ability to echolocate water by recognising the echo from smooth surfaces and did not record collisions with panels. This therefore confirms that bats will not be negatively affected by the solar panels (Greif, S., and Siemers, B. M. (2010) Innate recognition of water bodies in echolocating bats. Nat. Commun. 2(1):107; Russo, D., Cistrone, L., and Jones, G. (2012)</p> <p>Sensory ecology of water detection by bats: a field experiment. PLoS ONE. 7(10): e48144).</p>	<p>solar farms on birds, bats and general ecology (NEER012) within this document it states “Based on this review, there is currently no experimental observational or theoretical scientific literature on the effect solar panels may have on bats”</p> <p>There are other considerations besides panels. What of the construction itself and the lighting? Both of which can be detrimental to bats hunting and roosting and therefore the local bat populations.</p>
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