

**Lower Thames Crossing Team**

The planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**BY EMAIL ONLY**

17<sup>th</sup> July 2023

Dear Sirs,

**Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing Project  
Procedural Deadline D (PDD)**

We write on behalf of Cranham Golf Course Ltd (**CGC**) as an Affected Person (Unique reference number **20033956**) and wish to make representations in respect of the applicants' intention to compulsory purchase land owned by CGC in order to provide replacement open space for land lost by way of roadbuilding and utilities diversion at Thames Chase Forest Centre. This document questions the robustness of the assessment criteria applied and contends that better alternative locations exist.

The aerial image provided at Fig 1 identifies the Thames Chase Forest Centre Land in yellow with the land area shaded grey being the proposed replacement open space. Whilst the main land holding operates as an 18-hole golf course the land identified in grey currently accommodates a 3MW solar array.

Section 4.1 (Statement of Reasons) Volume 4, Annex B of the applicant's submission provides a schedule of 'negotiations' which includes references to emailed correspondence and meetings held with both CGC and Cranham Solar (a separate trading company operating the solar park). CGC would contend that nothing of any substance within the meetings and emails referred to provided any reasoned context as to the justification for losing a valuable renewable energy generating facility in favour of providing replacement open space. These concerns have been expressed to the applicant, but no substantive response received since email exchanges in December 2022.



Fig 1 – Cranham Golf Course (outlined red)

CGC are not satisfied that the applicant has fully explored alternative locations for the Thames Chase Forest Centre replacement open space. The only document produced by the applicant for review was issued by email on 23<sup>rd</sup> September 2022 titled 'Lower Thames Crossing Thame Chase Forest Centre Survey Results and Reasonable alternatives.' The introduction sets out the purpose of the report:-

*"The primary purpose of the survey was to gather the relevant evidence base for the Development Consent Order ('DCO') application. In particular, the survey was in relation to the impact of the Lower Thames Crossing ('the Project') on the Thames Chase Forest Centre **and the proposed replacement land associated with the impact.**" (Our emphasis)*

Although the applicant has attempted to distance itself from the document providing an assessment of suitable alternatives for replacement open space it remains a fact that this is the sole document in the possession of CGC that provides any explanation as to why Cranham Solar Park is the appropriate location for open space replacement land. Section 3 of the document is devoted to a discussion on alternative sites considered. CGC would contend that Paragraph 3.1.3 of the document explains the rationale behind the site selection.

*"the Project has consulted Thames Chase Trust and Forestry England who have expressed their strong preference for these selected locations for Replacement Open Space purposes over other potential locations in the area."*

Of the 4 alternative sites discussed in the report the main Cranham Golf Course site was dismissed from potentially being a suitable location. The justification is twofold and of significance to this representation. The explanation is set out in full below:-

*“This is a viable commercial business that intends to continue and, if the Project were to use this land, it would potentially instigate a significant business extinguishment claim.*

*Furthermore, this land isn’t ideally located for environmental mitigation of the Project particularly in relation to the mitigation requirements for Great Crested Newts. Surveys showed that this site already contains areas of suitable terrestrial habitat for Great Crested Newts (such as rough grass and scrub) and the golf course is well-linked to Thames Chase and lies within the buffer zone associated with the newt ponds to be impacted. Given its proximity, suitability and accessibility, it therefore is not appropriate to consider this site as ‘replacement’ habitat as it is likely to form part of the existing terrestrial habitat used by the newts.*

*Therefore, the Project will not pursue use of this land.”*



Fig 2 – Aerial Mapping showing 4 alternative sites to be considered (No 1 = Cranham Golf Course)

The two key reasons for not pursuing the golf course land are equally applicable to the solar park, namely:-

1. Cranham Solar Park is also a viable commercial business which has planning permission to generate electricity until **16<sup>th</sup> December 2056**. The site has been generating electricity for only 6 years and qualifies for generation payment under the feed-in-tariff. Proceeding with the compulsory purchase of this land will also therefore result in a significant business extinguishment claim.
2. Section 6.3, Appendix 8.17 (Draft EPS mitigation licence application) (5 of 5) of the applicant's submission provides details of the 50m, 250m and 500m pond buffers for Great Crested Newts (GCN) for 5 surveyed ponds north of St Marys Lane (Metapopulation N13). The same document records two 'non GCN' ponds on the solar park land as well a large hibernacula and refugia. The 250m pond buffer extends across the northern end of the solar park in the same way that it extends across the golf course. The 500m buffer extends across the entirety of both sites. Additionally, a total of 6 pond areas are established across the golf course, which based on Figure F1 would not appear to have been surveyed. Whilst CGC are uncertain whether GCN populations currently exist on the golf course historically GCN have been known to be present on the golf course. If a population does exist then clearly the extent of the buffer zones would increase and the importance of both sites being existing terrestrial habitat would seem to have an increased importance. It is notable that Figure F1 for Metapopulation N13 already highlights suitable features for GCN on the solar park site.

When questioned about the extent of ecology survey work on the site CGC were referred by the applicant to the PINS LTC website.

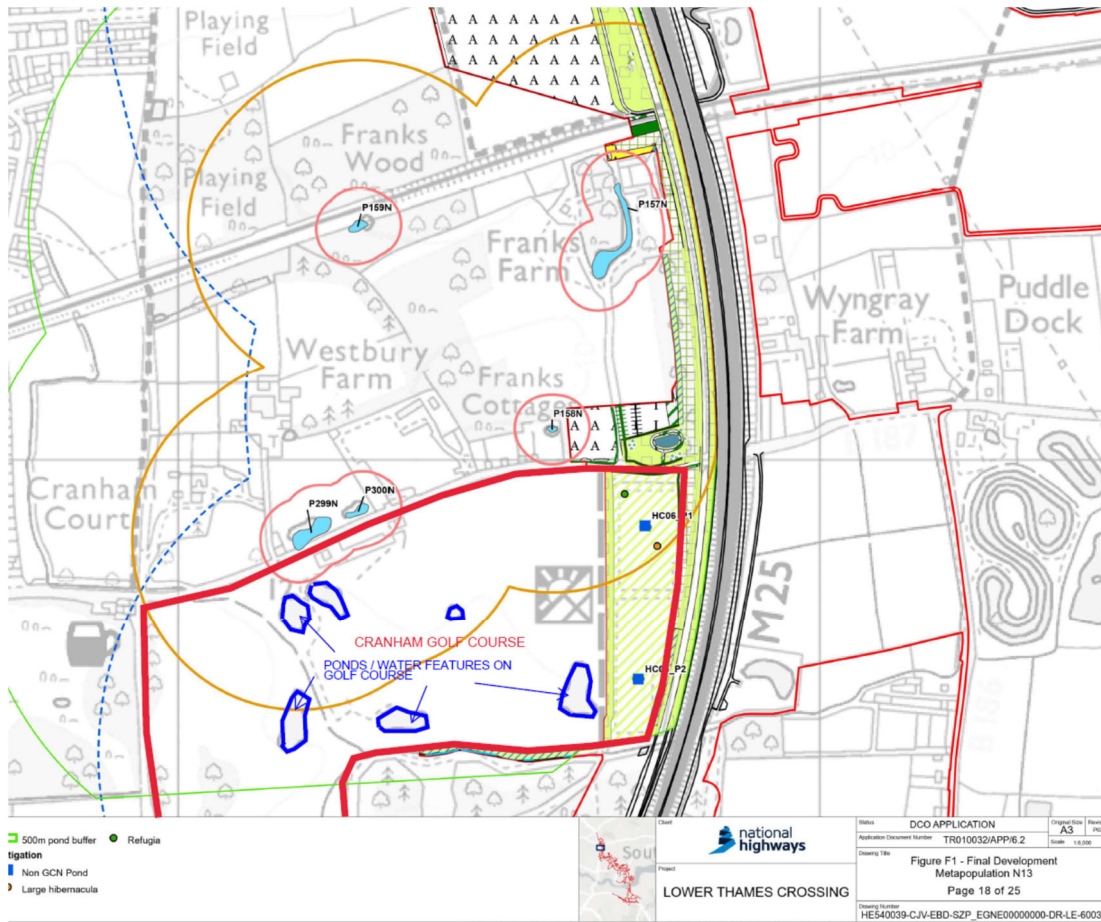


Fig. 3 Extract of National Highways mapping for GCN Metapopulation N13 with Cranham Golf Course Pond areas highlighted.

In summary, we contend that the site selection for replacement open space land for Thames Chase Forest Centre is predicated by Thames Chase Trust and Forestry England having a strong preference for the land rather than a robust assessment undertaken by the applicant. There is a strong commercial argument why agricultural land east or west of the Thames Chase Forest Centre should be considered in preference to the CGC owned land. The ecological justification for selecting the solar park in preference to the golf course is at best unconvincing.

We trust that these representations will receive consideration when Compulsory Acquisition Hearings commence and that this will be treated as the basis of a written objection by CGC.

Yours faithfully

Alan Brown BA.Arch MCIAT  
For and on behalf of Alan Brown Development Services Ltd.