**Objection Note to Proposed Solar Farm, Land at Long Sutton, Hampshire**

**Hart District Council Application ref: 23/02591/FULL/21161**

1. Introduction
   * + - 1. We act on behalf of the Long Sutton Action Group Limited in their objection to proposals by Fleet Solar Ltd for a solar photovoltaic farm on land to the north and west of Long Sutton in Hampshire. We have reviewed the development proposals and are objecting to the scheme in respect of highways, access and transport sustainability matters.
         2. This note continues in Section 2 with a review of the proposals and in Section 3 with the shortcomings of the scheme and reasons for objection. The conclusions are given in Section 4.
2. Proposals
   * + - 1. The proposals are for provision of four main areas of solar panels around the village of Long Sutton. Each area would have an individual access from the existing road network and be linked to the main site, which has a construction compound and storage facility, by existing and proposed roads:

* Site 1 lies to the west of the B3349 Alton Road and has a site access off Ford Lane some 400m from the Alton Road junction, almost opposite an existing field access.
* Site 2 is to the south of Hayley Lane. Hayley Lane provides a link between Alton Road at the crossroads junction with Ford Lane and Long Sutton some 900m to the south east.
* Site 3 is to the north west of Wood Hill Lane and is served by a second access off Hayley Lane. This access and internal road would also serve the compound.
* Site 4 is to the south east of Wood Hill Lane and wraps around the northern part of Long Sutton. The vehicular access route is proposed from Site 3 with a vehicular crossing of Wood Hill Lane about 200m south east of a crash gate at the southern corner of Odiham Airfield and RAF station.

1. Relevant Policy
   1. National Planning Policy Framework, December 2023 (NPPF)
      1. NPPF confirms at para. 114b that a suitable and safe access should be provided for all users and at para. 114c that design should reflect national guidance.
      2. It is confirmed at para. 115 that applications should not be refused unless there is a cumulative severe transport impact or there are safety issues with a proposal.
      3. In para. 116 it indicates that proposals should facilitate public transport including plug-in chargers for electric vehicles.
   2. Hart Local Plan (Strategy and Sites) Adopted April 2020
      1. The Hart Local Plan confirms a number of relevant transport policies. Policy INF2 confirms that green infrastructure including public rights of way should not be adversely impacted and should be enhanced where possible.
      2. Policy INF3 indicates that sustainable transport should be promoted with safe and suitable access provided for all. On-site movements compatible with all users should be provided with appropriate parking provision and public rights of way should be protected and enhanced where possible.
      3. Under policy INF1 surface water drainage should not lead to problems on and off site.
2. REVIEW OF TRANSPORT PROPOSALS
   1. Access Design and Visibility
      1. The junction visibility splays at the field accesses are substandard for the National (60mph) speed limit on Ford Lane, Hayley Lane and Wood Hill Lane, are not sufficient for the speed of traffic and are not proposed to any particular standard. There is no evidence provided from vehicle speed surveys to justify the visibility distances used.
      2. The horizontal visibility splays on the access plans are shown incorrectly as they do not show the full visibility envelopes. On Ford Lane the access is on the inside of a bend and therefore the required visibility splay to the left would be obstructed by the extensive number of trees within the site frontage.
      3. The visibility splays do not take into account that the trees and hedges along the site/field boundaries also obstruct the splays vertically and would need to be cut back or removed. This means that the works would need to be done outside of the bird nesting period. On this basis their forecast 28- week programme could also be incorrect.
      4. A number of trees and hedges would need to be removed to allow for the widening required at existing accesses and to allow for new accesses.
      5. It is not clear whether the visibility splay works are within the public highway as some are shown outside of the planning redline.
      6. The swept path analysis is only for articulated lorries and this should also be undertaken for large rigid lorries and low loaders.
      7. The swept path analysis for the articulated lorries shows that at each of the access junctions if there is an opposing vehicle passing is not feasible and there is overrunning of verges which confirms the junction designs are inadequate.
   2. Off-Site Issues
      1. The substandard visibility at the Ford Lane/B3349/Hayley Lane crossroads junction is not considered in terms of accidents or vehicle speeds.
      2. Existing accidents in the area are not reviewed or considered.
      3. Passing places along Ford Lane are very limited and inadequate for a lorry/car to pass each other over a 400m length of road.
      4. There is no intervisibility from the Ford Lane site access to the B3349 Alton Road.
      5. There are no banksman proposals at off-site locations along Ford Lane to control traffic movements.
      6. No existing road widths are provided to confirm that the roads are wide enough for two HGVs or a car/van/HGV to pass.
      7. The existing roads and junctions as well as the access points should be tracked for HGVs to confirm the suitability or not of the roads.
   3. Traffic Surveys
      1. There are no traffic surveys of Hayley Lane to confirm the assertions on traffic impact. Some of the routes around Long Sutton are popular cycling routes and this is not considered.
      2. PEP is concerned that the traffic numbers given do not allow for all the excavated materials to be removed off site from the piling depending on type, drainage and haul routes/access roads to be built. No allowance is made for trips between the four sites and what vehicles would be used.
   4. Public Rights of Way
      1. Within the land parcel east of Wood Hill Lane (Site 4) there are two public footpaths across the land. These are crossed by the proposed internal roads at three locations as well as at the access. There is no assessment in the Construction Traffic Management Plan (CTMP) of the impact on the pedestrian rights of way or a survey of existing pedestrian use and no details of temporary proposals for diversions or closure of the rights of ways are provided.
   5. Internal Road Design
      1. In terms of the internal layout the access tracks in some cases have no turning heads included so it is unclear how vehicles would turn without a long reverse which in a van or HGV would not be satisfactory.
      2. The crossing of Wood Hill Lane does not show any required visibility splays and the impact of cutting hedges/trees back is not included. Traffic management is proposed on Wood Hill Lane but no details are given.
      3. It would be normal to blacktop the initial 10m-15m section of the access road into each site to avoid bringing stones, mud and debris on to the highway. The CTMP references using a stone surface but no detail is given how drainage from the stone, which is likely to slope towards the public roads, is to be dealt with.
   6. Other Matters
      1. There is no mention of undertaking highway condition surveys before and after construction in agreement with the Highway Authority. This would be required.
      2. There is an emergency crash gate for RAF Odiham on Wood Hill Lane. This is not mentioned in the proposals nor measures to maintain Wood Hill Lane clear for emergency vehicles.
      3. There is no Section 106 commitment to controlling traffic to the site and, unusually, working hours are proposed beyond 18:00 which is not normally acceptable on environmental grounds particularly around a village. The hours of construction proposed are inconsistent in the CTMP with 07:00-20:00 (para.4.12) and 08:00-20:00 (para.6.3) on weekdays indicated.
      4. There is a suggestion that traffic movements would be controlled outside of the peak hours but it is not confirmed how this would be achieved and it is not confirmed that the times referenced are actually the peak periods locally.
      5. There is reference to transporting staff by minibus from towns or train stations and to car sharing but no details are mentioned of how this would be achieved and which towns and stations are considered.
      6. There are other field accesses in use around the parcel north east of the village. It is not clear what control there would be of these accesses because there could be site excavation proposed for up to 28 days.
3. CONCLUSIONS
   * + - 1. In summary this planning application should be refused because the applicant has not:

* demonstrated safe and suitable accesses including both left and right visibility splays, access design and exit/entry from the sites. The impact on existing hedges and trees has not been considered for the visibility splays;
* considered the Ford Lane/Hayley Lane/B3349 crossroads junction which is substandard and appropriate visibility is not available. There are intervisibility issues on Ford Lane between the site access and Alton Road;
* considered the impacts on the pedestrian public rights of way;
* undertaken any traffic, vehicles or pedestrian traffic counts to demonstrate the impact of the construction traffic;
* fully considered construction traffic levels which seem to omit certain elements of works and no details of the internalvehicle movements have been provided;
* provided commitment or details of staff traveling sustainably to the site;
* demonstrated that adequate parking would be provided;
* considered the impact on highway drainage given that the proposed accesses drain towards Hayley Lane and Ford Lane.