



Indian Queens Solar

Land East of Tregonning Farm, Kestle Mill, Newquay, Cornwall

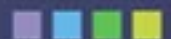
Construction Method Statement

Prepared for



European Energy

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1.0 INTRODUCTION

1.1 Preamble

1.1.1 Axis has been appointed by European Energy (EE) to prepare this Construction Method Statement (CMS) in relation to the approved solar farm development ('the development') on land east of Tregonning Farm, Kestle Mill, Newquay, Cornwall, TR8 4PR (the 'site'). The site is located within the administrative boundary of Cornwall Council (CC).

1.1.2 Planning permission for the development was granted in December 2023 (reference PA22/01511). A subsequent non-material amendment to the approved site plans and description of development was then granted by CC in December 2025 (reference PA25/09331).

1.1.3 The description of development as agreed under PA25/09331 is as follows:

'The construction and operation of a solar photovoltaic farm with associated infrastructure, including inverters/transformers, string inverters, customer substation, security cameras, fencing, access tracks and landscaping'

1.1.4 A copy of the site layout plan as approved under PA25/09331 is included at **Appendix A**.

1.1.5 The planning approval is subject to a series of conditions, including Condition 14 which requires a CMS to be provided. Condition 14 is worded as follows:

'The development hereby permitted must not commence until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period. The statement shall address the following:

- a) The routing of deliveries and construction vehicles to site.*
- b) Details of arrangements for co-ordinating and controlling delivery vehicles.*
- c) Site set-up and layout plans.*
- d) Parking arrangements for site operatives and visitors.*
- e) Loading and unloading of plant and materials.*
- f) Storage of plant and materials used in constructing the development.*
- g) On-site turning facilities for all vehicles.*



h) Wheel washing facilities.

Reason: To minimise construction traffic impacts on the local road network in accordance with Cornwall local plan policy 27'.

1.1.6 Condition 14 was discharged by CC on 16th December 2025 following the submission of a CMS report dated 20th November 2025 prepared by Motion Consultants (the 'Motion CMS'). Confirmation of Condition 14 discharge is contained at **Appendix B**.

1.2 Purpose of this CMS

1.2.1 The purpose of this CMS is to set out a revised construction routing strategy for the development, alongside providing further details on how construction traffic will be controlled and managed to ensure that safe and efficient procedures are maintained and to minimise impacts on the local community and other users of the local transport network. This includes matters such as holding areas, awareness of equestrian users along the access route, signage, delivery timing and programming, and environmental control measures.

1.2.2 This CMS has been prepared through dialogue with EE and provides an agreed set of procedures and controls to ensure that the impacts from construction traffic associated with the development are minimised.

1.2.3 To help assist and inform this revised CMS, EE met with Councillors and the local community at a consultation event at St Newlyn East Village Hall on 18th March 2026. Feedback received during this process has been reflected in this version of the CMS and is in part a demonstration of good community engagement. In particular, and in response to specific concerns raised, it includes a revision to the routing strategy from that contained in the Motion CMS, such that the village of Summercourt and associated nearby roads are now entirely avoided. A range of additional traffic control and road user safety measures are also included herein, beyond those identified in the Motion CMS.

1.2.4 This CMS is a 'live' document that can be revised and updated, as necessary. All those working at the site must comply with the procedures set out herein.

1.3 Pre-application Discussions and Community Engagement

1.3.1 Positive pre-application discussions were undertaken with CC in relation to the proposed construction traffic routing for the development.



- 1.3.2** A meeting was held with Huw Gibbon, Principal Development Officer (Highways) at CC, during which the draft CMS proposals were tabled and discussed in detail. In particular, discussions focused on the proposed revised routing strategy for construction traffic. No objections were raised to the revised approach and there was broad agreement that the amended routing represented an appropriate solution to minimise impacts on local communities whilst accommodating construction traffic safely and effectively.
- 1.3.3** In parallel with these discussions, a programme of pre-construction community engagement was undertaken to inform the development of the CMS and wider project proposals. Two public consultation events were held in relation to the proposed development:
- a) St Newlyn East Village Hall – Wednesday 18 March, 5:30pm–8:00pm; and
 - b) Victory Hall – Wednesday 6 May, 6:30pm–8:00pm.
- 1.3.4** For the St Newlyn East event, notification letters were issued to approximately 130 nearby homes and businesses. Engagement was also undertaken with St Newlyn East Parish Council, including a meeting earlier on the day of the event. The Parish Council assisted in promoting the consultation through its established communication channels, including local social media platforms.
- 1.3.5** Feedback received during the consultation process proved valuable and directly informed revisions to the CMS. In particular, concerns were raised regarding the routing of construction traffic through Summercourt. In response, the proposed route was amended to reduce potential impacts on nearby residential properties and local services, instead utilising wider roads considered more suitable for HGV movements.
- 1.3.6** For the Victory Hall event, approximately 300 notification letters were distributed to residents and businesses located along the proposed cable route. In addition, a quarter-page advertisement was placed within the Cornish Guardian newspaper, details were promoted through the associated “What’s On” online service, and St Enoder Parish Council was contacted to assist in publicising the event locally.
- 1.3.7** Both consultation events were attended by Dick Cole and Parish Council Chairman Ross Wimberley, providing a constructive opportunity for open discussion with elected representatives, local stakeholders and members of the community.



1.3.8 EE intends to maintain regular engagement with local communities and stakeholders throughout all phases of the project, including pre-construction, construction and operational activities.

1.3.9 The project will also be delivered in accordance with the principles of the Considerate Constructors Scheme (CCS), with a strong emphasis on being a considerate neighbour throughout the works. This includes minimising disruption where practicable, maintaining clear and proactive communication with residents and stakeholders, and ensuring high standards of safety, environmental management and site operations at all times. EE recently achieved a “Very Good” assessment rating of 33/45 under the CCS on a comparable project in Gloucestershire, demonstrating a clear commitment to industry best practice in construction management and community relations.



2.0 SITE CONTEXT

2.1 Site Location

2.1.1 The location of the site in relation to the strategic road network is shown on **Image 2.1** following. This includes the cable route between the site and the Indian Queens sub-station east of the A30.

Image 2.1 – Site Location (Strategic Context)



2.1.2 The site location in a more localised context is shown at **Image 2.2**.

Image 2.2 – Site Location (Local Context)



2.1.3 The site is located to the northwest of the road that operates between Tresillian Cottages on the A3058 and White Cross ('White Cross road'). Construction access to the site is taken from the northern side of White Cross road at a point some 740 metres east of its junction with the A3058. The site access arrangements are discussed in greater detail later in this Chapter.

2.2 Highway Network

A30

2.2.1 The A30 is a dual carriageway trunk road that forms part of the Strategic Road Network (SRN). It operates in a broad east-west alignment through the south-west of England. Locally to the site, it provides two running lanes in each direction and is derestricted. The road is unlit. Each carriageway is some 7.5 metres in width.

2.2.2 The A30 provides access to and from the A3076 at Mitchell by way of on-slip and off-slip roads from the eastbound carriageway of the A30.

2.2.3 Access to the A3076 from the westbound A30 carriageway is best achieved through travelling via the all-movements, grade-separated junction of the A30 / A39 (Carland Cross) which is located some 1.7 kilometres west of Mitchell and allows vehicles to travel back along the A30 in an eastbound direction before utilising the abovementioned A30 eastbound on-slip onto the A3076 at Mitchell.

2.2.4 Vehicles seeking to travel westbound along the A30 after travelling on the A3076 should do so by first travelling eastbound along the A30 and then turning back along the A30 westbound at the A30 / A39 junction (Highgate Hill Roundabout), which is located some 8 kilometres east of Mitchell and is a large, grade-separated junction allowing for all movements. Whilst more direct access to and from the A3076 and the westbound A30 carriageway is also achievable at Mitchell, this requires routing through Mitchell via Four Winds, which is a relatively constrained road subject to on-street parking.

A3076

2.2.5 The A3076 operates from the northern side of the A30 and continues north for a distance of some 3 kilometres to a priority crossroads junction at the A3058, which features a ghost island right turn lane on the major road carriageway (A3058). It is a single carriageway, two-way road with a typical carriageway width of some 5.5 - 6.0 metres. The road is unlit and is derestricted.

A3058

2.2.6 The A3058 operates in a general east-west alignment and serves a number of destinations in the area, including Newquay and St Austell. It is accessed from the A3076 by way of the abovementioned priority crossroads junction and continues west for a distance of some 450 metres to a priority staggered crossroads junction with White Cross road at Tresillian Cottages. The junction features a ghost island right turn lane on the major road (A3058).

2.2.7 It is a single carriageway, two-way road with a typical carriageway width of some 5.0 - 5.5 metres. The road is unlit and is derestricted. The road operates with a 24-hour clearway restriction, with stopping not permitted at any time.



White Cross Road

- 2.2.8** The road from the A3058 to White Cross ('White Cross road') is a narrow, rural, unlit, two-way, derestricted road. It operates for a length of some 740 metres between the site access and the above-mentioned priority junction at the A3058. The entry point to the road from the A3058 is shown at **Image 2.3** below.

Image 2.3 – White Cross Road (Western End) from A3058



- 2.2.9** The section of road between the A3058 and the principal site access provides for single way working only, being some 2.5 - 3.0 metres in carriageway width for the majority of its length. There is also limited verge provision, with hedgerows present on both sides of the road close to the carriageway edge for much of its length.
- 2.2.10** Smaller vehicles (e.g. cars / vans) can pass at the western end of the road at its junction with the A3058 (shown at **Image 2.3**). No further formal vehicle passing opportunities are however provided for the remainder of the road up to the principal site access. Beyond the principal site access junction, the road is wider at a some 5.0 - 5.5 metres typical carriageway width, affording two-way vehicle movement in the main.

2.2.11 There are a number of field accesses along both sides of the road which enable smaller vehicles (e.g. cars) to pull in to allow oncoming vehicles to pass, however there is no formal passing provision for larger vehicles (HGVs) anywhere along White Cross road between its junction with the A3058 and the site.

2.2.12 It is understood that the road is also subject to a number of equestrian users that route past the site access. All drivers must be aware of the potential presence of Non-Motorised Users (NMU) on this road and surrounding areas at all times and a range of equestrian safety measures have been identified in this regard, as set out further below.

2.2.13 Whilst the road is relatively lightly trafficked, strict protocols are necessarily in place in relation to the management of construction traffic on this route, as detailed later in this CMS.

2.3 Highway Condition Survey

2.3.1 Whilst not a requirement or condition of the planning consent, EE have confirmed that they will undertake a highway condition survey of local roads prior to the commencement of the works, and again following completion of the works.

2.3.2 The highway condition survey will cover the section of White Cross road between the A3058 and the site accesses.

2.4 Public Rights of Way Network

2.4.1 There are no Public Rights of Way (PRoWs) that operate within or adjacent to the site and as such the PRoW network will remain unaffected by the development.

2.4.2 All those working at the site must however be vigilant and mindful at all times of the potential presence of NMUs in close proximity to the site, including along the identified construction route. In particular, it is understood that White Cross road is subject to a number of equestrian users that route past the site access.

2.5 Site Access from Highway Network

2.5.1 Principal construction access is provided at the site's south-eastern boundary via White Cross road at a point some 740 metres east of its junction with the A3058. This is the location of the existing Tregonning Farm access, which is shown at **Image 2.4** following.

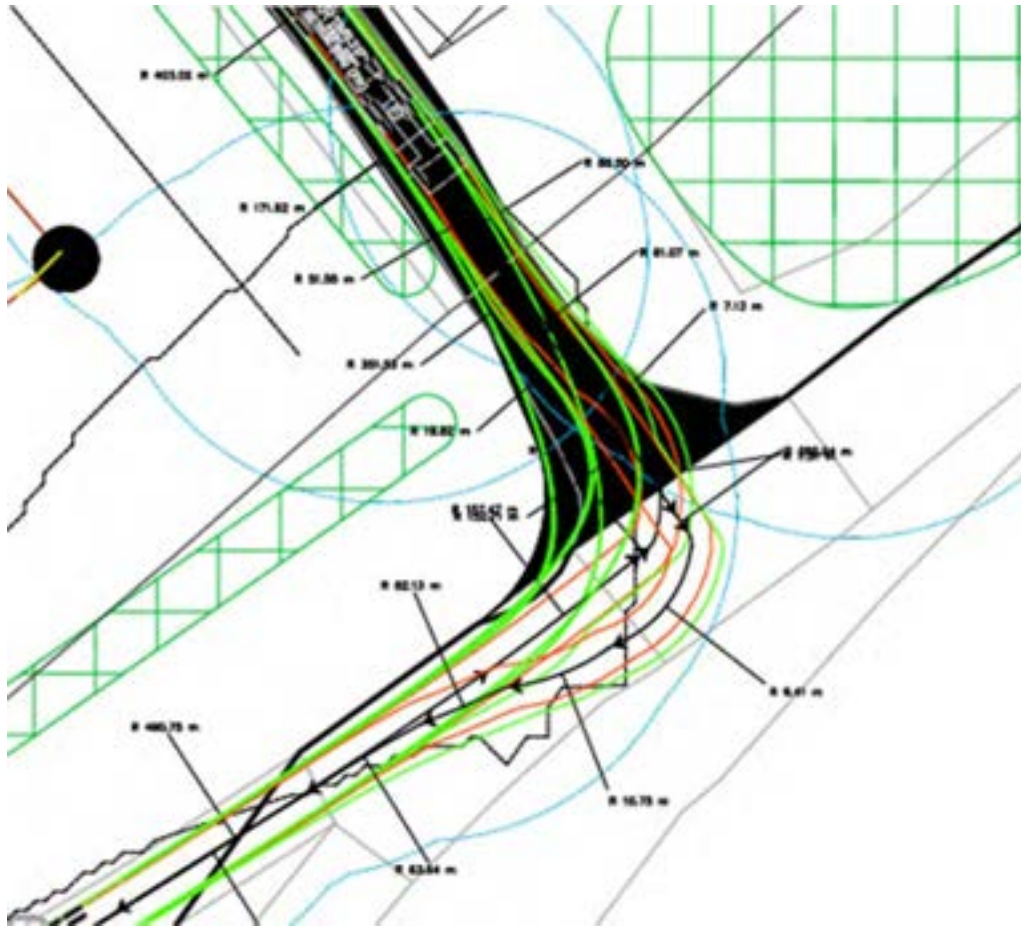


Image 2.4 – Principal Site Access (Left of Image) from White Cross Road



2.5.2 The site access would be subject to widening works to allow for suitable 16.5m articulated HGV access and egress. The extent of widening works is presented at Drawing 2106089-TK06 within the Motion CMS. An extract of this drawing is also provided at following **Image 2.5**.

Image 2.5 – Site Access Widening Works (Extracted from Motion CMS)



2.5.3 The site access bellmouth will not allow for two-way HGV movement, however the internal road network within the site will afford suitable areas for HGVs to pass and turn around.

2.5.4 Access to the sub-station area of the site is provided further north on White Cross road via the public road leading to Coswarth which traverses the site some 750 metres beyond the principal site access. This northern site access will primarily be used for the delivery of the sub-station and not for regular construction activity. The location of this junction is shown at following **Image 2.6**.

Image 2.6 – Secondary Site Access (Sub-Station) at Road to Coswarth

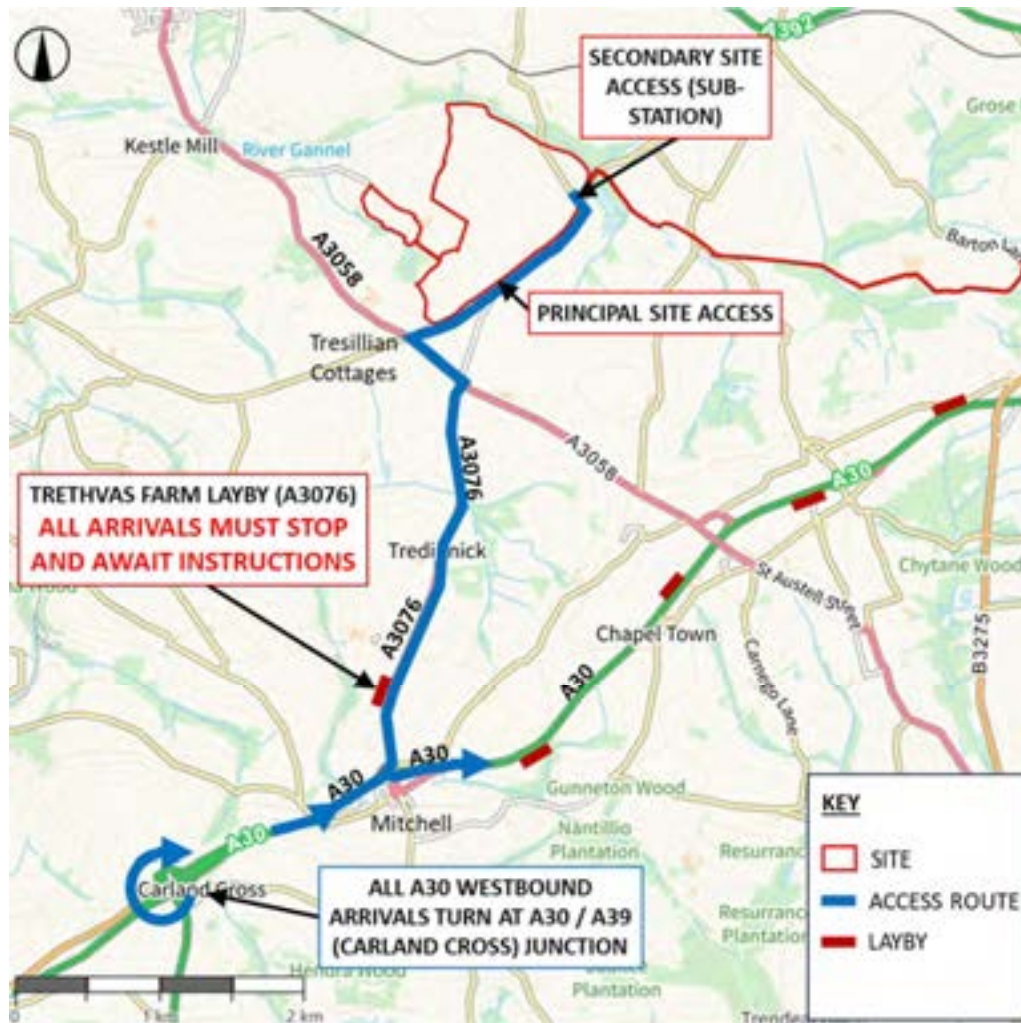


- 2.5.5** Entry to the sub-station area of the site is provided from the eastern side of the Coswarth Road some 80 metres beyond this junction. The location of both site accesses are identified on the routing plan at **Image 3.1** later in this CMS.
- 2.5.6** All construction vehicles will enter and exit the site in forward gear. Banksmen will be positioned opposite the site accesses when heavy and large construction vehicles are leaving the site.

3.0 REVISED TRAFFIC ROUTING

- 3.1.1** The routing arrangement set out within the Motion CMS involved vehicles travelling through the village of Summercourt.
- 3.1.2** However, in response to local concerns regarding the routing of construction traffic through Summercourt, a revised routing strategy had now been identified. This involves vehicles routing via the A3076 at Mitchell, thereby entirely avoiding Summercourt and its sensitive receptors, which include various local tourism businesses, shops, cafes, playgrounds, a village hall, areas of on-street parking and in the order of 100 residential properties.
- 3.1.3** By contrast, the revised routing arrangement presented in this CMS incorporates very few sensitive receptors with just 10 or so residential properties along the updated route between the site and the A30.
- 3.1.4** In addition, the revised routing arrangement now enables the use of a sizeable layby off the A3076 at Trethvas Farm, thereby providing a dedicated holding area for construction vehicles prior to their arrival at the site itself. This is discussed in greater detail further below.
- 3.1.5** The revised routing arrangement is shown at following **Image 3.1**.

Image 3.1 – Construction Traffic Route



3.1.6 A description of the route is also provided below.

3.2 Arrivals

3.2.1 Approach the A3076 via the A30 eastbound at Mitchell. The A3076 is signed on the A30 eastbound carriageway approach as 'Newquay A3076' with additional 'A3076' signage at the slip road entry. A diverge lane is provided on the A30. The slip road is shown below from the A30 eastbound carriageway.

Image 3.2 – A30 Off-Slip at Mitchell



- 3.2.2** Vehicles approaching Mitchell from the A30 westbound carriageway (i.e. from the Exeter / Plymouth direction) should continue beyond Mitchell and turn at the A30 / A39 grade-separate junction at Carland Cross, located some 1.6 kilometres west of Mitchell. This will provide access to the A30 eastbound carriageway.
- 3.2.3** Upon exiting the A30 eastbound, continue north for a distance of some 130 metres to the priority junction roundabout on the A3076 at the top of the slip roads. Take the first exit at this roundabout onto the A3076 northbound (signed for Newquay / St Austell).
- 3.2.4** After travelling for 150 metres on the A3076, stop at the Trethvas Farm Layby on the western side of the A3076 before awaiting instructions to proceed. Drivers must only proceed to the site once confirmation to do so has been given. The Trethvas Farm Layby is shown below.

Image 3.3 – Trethvas Farm Layby on A3076



3.2.5 After departing the Trethvas Farm Layby, continue northwards on the A3076 for a distance of some 2.4 kilometres to the A3076 / A3058 priority crossroads junction. Turn left onto the A3058 northbound (signed for Newquay).

3.2.6 Continue on the A3058 northbound for 470 metres to the priority crossroads junction of the A3058 / White Cross road (**Image 2.3**). Turn right onto White Cross road (signed for White Cross / St Columb Major). The site will also be signed at this location. A ghost island right turn lane is provided on the A3058.

3.2.7 Continue on White Cross road for a distance of 740 metres to the principal site access (**Image 2.4**) or continue to the secondary site access (**Image 2.6**) as may be necessary.

3.3 Departures

3.3.1 Departures follow the same route as arrivals. Vehicles should however only depart the site once instructed to do so by the internal site gatehouse.

3.3.2 Vehicles do not need to stop at the Trethvas Farm layby on the departure journey.



3.3.3 Vehicles should continue past the Trethvas Farm layby and onto the A30 eastbound carriageway via the on-slip road at Mitchell.

3.4 Route Constraints

3.4.1 The various characteristics and constraints associated with the roads on the above route are set out at Chapter 2 of this CMS.

3.4.2 In particular, White Cross road on approach to the site is a very narrow road which operates with single way working only. For this reason, drivers must only proceed / depart the site / Trethvas Farm Layby once directed to do so in order to ensure this section of the route is clear and available for use.

3.4.3 Drivers should also be mindful of potential NMU activity, particularly equestrians, on White Cross road although best endeavours will be made to ensure the road is clear of all NMUs prior to being given instruction to proceed.

3.5 Holding Areas

3.5.1 The internal site area and the Trethvas Farm Layby on the A3076 would serve as vehicle holding areas. In the event that the Trethvas Farm Layby is at capacity (or not available for use) drivers seeking to access the site will instead be instructed to wait at one of the various laybys on the A30 as shown at **Image 3.1**.

3.6 Site Internal Routing

3.6.1 Once within the site, all drivers must report to the gatehouse located within the site entrance and follow instructions, as detailed later in this CMS.

3.6.2 Adequate space for vehicle manoeuvring and turning will be available on site. Additional and upgraded access tracks will be constructed to allow access for the construction, operation, maintenance and decommissioning of the development.

3.6.3 Tracks will measure 4 metres wide; however, this will be increased at bends. All new tracks will be unpaved and constructed from local stone. Geosynthetic reinforcement or soil stabilisation may be used to reduce the depth of track construction.

3.6.4 The surface will be a compacted granular material (crushed rock) up to an approximate thickness of 0.3m, dependent on the ground conditions.



3.6.5 Load bearing crane hardstanding areas with a high load bearing capacity will be provided to support cranes as they lift the transformers from the delivery vehicles. The site tracks can be used for this purpose, with some localised widening where required.

3.6.6 The internal access tracks will be left in situ after completion of the solar farm construction, as they will provide:

- i) Access to the development for maintenance and repair works;
- ii) Access for the landowner; and
- iii) Access for decommissioning of the development.

3.6.7 Once the solar farm is decommissioned, unless required by the landowner and agreed with CC, all new internal access tracks will be removed.

4.0 CONSTRUCTION TRAFFIC MANAGEMENT STRATEGY

4.1.1 A number of procedures relating to the management of construction traffic have been identified. These measures are outlined below. These procedures must be adhered to at all times.

4.2 Hours of Operation

4.2.1 The hours of operation at the site are:

- i) 08:00-18:00 on Mondays to Fridays,
- ii) 09:00-13:00 on Saturdays, and
- iii) No activity on Sundays or Bank / Statutory Holidays.

4.2.2 Outside of these times works are limited to a) commissioning and testing and b) Works required in an emergency where there is the potential of harm or damage to personnel, plant, equipment, or the environment, provided EE retrospectively notifies CC of such works within 24 hours of their occurrence.

4.2.3 Deliveries, wherever feasible, should also be scheduled to avoid peak times on the highway network (0800-0900 hours and 1700-1800 hours on weekdays).

4.3 Construction Programming and Sequencing

4.3.1 The development programme would broadly be as follows:

- c) Site Set-up, including laying temporary roads, preparation of earthworks and foundations, mobilisation, construction of site compound and the installation of perimeter fences;
- d) Solar Panel Installation, including piling, DC trenching, installing mounting systems and modules;
- e) Electrical Infrastructure Installation, including installation and connection of relevant cables and the installation of substation;
- f) Testing and Commissioning; and,
- g) Completion Works, including removal of site compound and temporary works together with final landscaping works.

4.3.2 An indicative programme of works is as follows:



- a) Set up and mobilisation (4 weeks);
- b) Construction (26 weeks); and
- c) Commissioning (8 weeks).

4.3.3 The majority of materials and components, especially large components, will be delivered as they are required on site. However, storage containers will be provided on site which will contain spare parts and maintenance kit.

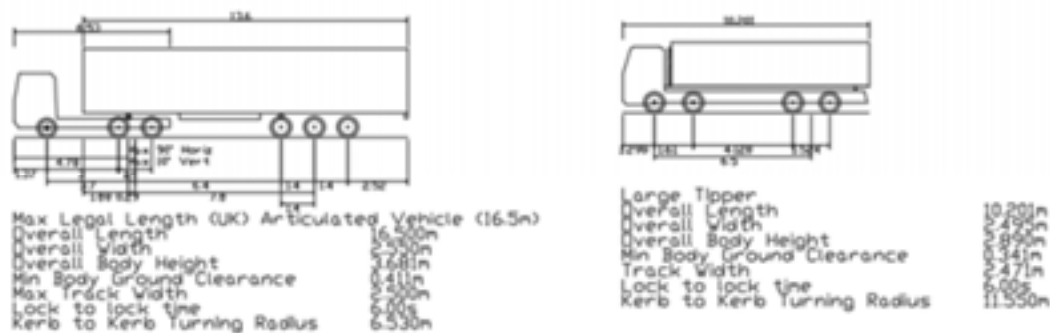
4.4 Delivery Vehicle Information

4.4.1 The types of construction HGVs typically expected to be used during the construction phase are outlined below:

- i) Articulated HGV measuring 16.5 metres in length; and
- ii) 8-wheel tipper truck.

4.4.2 The typical profiles of such vehicles are illustrated in **Image 4.1** following:

Image 4.1 – Vehicle Profiles



4.5 Security Gatehouses

4.5.1 Security gatehouses would be set up and located as follows: -

- i) **End of Site Access Road.** This gatehouse would be located within the site entrance (access to Tregonning Farm) with sufficient clearance provided to the White Cross road carriageway to accommodate at least two stacked 16.5m articulated vehicles.
- ii) **Trethvas Farm Layby.** This gatehouse would be located at the holding area at the Trethvas Farm Layby on the A3076. Sufficient clearance is provided at this locality to accommodate several (at least 5 no.) stacked 16.5m articulated vehicles.

- 4.5.2** The gatehouses would be provided with two-way radio communication facilities between the other gatehouse / TMs and the Site Manager.

Arrival Procedure

- 4.5.3** All arriving drivers must report to the security gatehouse at the Trethvas Farm Layby on the A3076 in the first instance, where their details will be recorded and will be checked against the booking log.
- 4.5.4** Assuming the vehicle arrives within its designated time slot, and two-way radio communication between the Traffic Marshall (TM) at the Trethvas Farm Layby, the TM at the A3058 / White Cross road junction (during peak phases), and the TM at the site access compound confirms that the vehicle can be accepted, the driver will be instructed to proceed to the site.
- 4.5.5** If the route is not clear (e.g. a vehicle is currently exiting the site) the driver will be directed to remain at the Trethvas Farm Layby holding area until it is safe to continue.

Routing Procedures Within Site

- 4.5.6** All drivers will report to the security gatehouse upon entry to the site.
- 4.5.7** On entering the site, construction traffic will be directed to follow the established traffic management systems which will include turning facilities and one-way road systems.
- 4.5.8** The entrance to the site will be marked by a 'Site Entrance' sign. The site access will have a permanent TM on duty who will prevent unauthorised persons from entering the site.
- 4.5.9** All vehicles will observe a 10mph site speed limit at all times. Emergency procedures and location of assembly areas will be made known to all contractors during induction. All contractors and visitors will sign in upon arrival and upon leaving the site.

Departure Procedure

- 4.5.10** Drivers will be held on-site until given authorisation by the principal security gatehouse to proceed.



4.5.11 In the event that a vehicle is arriving (i.e. they have departed the Trethvas Farm Layby) at the same time that a vehicle is waiting to depart, the departing vehicle will be held within the site until the arriving vehicle has entered the site.

4.5.12 All departing vehicles will be checked for wheel cleanliness and sheeting as necessary (discussed later in this CMS) and will be instructed to proceed when able to do so. They will be reminded to turn right out of the site.

4.6 Driver Awareness Measures

4.6.1 White Cross road on approach to the site is frequently subject to equestrian users that route past the site access. All drivers must be aware of the potential presence of Non-Motorised Users (NMU) on this road and surrounding areas at all times, particularly equestrians. Drivers must give way to NMUs at all times.

4.6.2 Warning signage pertaining to the potential presence of accompanied horses will be in place on White Cross road on approach to the site. Drivers will also be advised prior to their journey to the site of the potential presence of equestrians. The following procedures will also apply, as advised by the British Horse Society (BHS).

British Horse Society Construction Site Guidance

4.6.3 The BHS publishes advice on 'Construction sites and horses' and 'Solar farms near routes used by equestrians' within guidance notes dated August 2024 and August 2025, respectively. Copies of these notes are provided within **Appendix C** at the end of this report.

4.6.4 A summary of the relevant interventions and requirements that the BHS stipulates are listed within the following bullet points. Whilst a number of these measures relate specifically to interaction with bridleways - of which there are none within or adjacent to the site - these measures are considered to remain equally applicable and appropriate in the context of the local lanes on approach to the site.

- i) Unobstructed access: The bridleway must remain fully open with no obstruction. Debris, materials, fencing, machinery or trip hazards must not block any part of the full width;
- ii) Appropriate surface: The surface of the route must remain suitable for horses. It should not be slippery or contain sharp/hazardous stones. If the ground is disturbed by the construction work, any damage must be protected or repaired;



- iii) Temporary works (fencing, barriers, signage) must be horse-safe:
 - a. Fencing or barriers erected temporarily near a bridleway must be secured tightly (not flapping or noisy). Fencing should only be used if it can be kept taught at all times with frequent checks;
 - b. Avoid using wind-blown sheeting, or any material that may rustle, flap or move unpredictably – horses are alert to sudden movement or noise;
 - c. Avoid placing flags, feather-flags, or promotional banners near bridleways – the movement and flapping that make them effective for advertising also make them dangerous for horses;
- iv) Noise and machinery management:
 - a. Construction machinery or other noisy / moving equipment must not start or operate when a horse is passing nearby. If machinery is being used, operators must stop movement/noise when horse approach, to avoid spooking them.
 - b. Activity must not resume until horses are safely past and the rider gives clear signal. BHS recommends waiting until the horse and rider are out of sight and sufficiently distant (they suggest 50 metres as a safe distance).
 - c. If it is not possible to stop work when horses pass, staff should remain visible and not behind trees or equipment.
- v) Clear and safe overhead and side clearance:
 - a. Overhead hazards (branches, cables, and scaffolding) must provide sufficient clearance. BHS recommends at least 3.4 metres clearance, preferably 3.7 metres, to allow for the possibility of a horse rearing or being startled and jumping; and
 - b. The route should be at least 4 metres wide to allow comfortable passage for horses (and for two-way passing if necessary), with vegetation or hedges cut back so the full width remains available.

HGV Driver Training Re. Equestrians

- 4.6.5 All HGV drivers and site personnel must receive clear instruction and awareness training on how to safely respond when encountering horses and riders.
- 4.6.6 This training should follow the guidance provided by the BHS, and include appropriate behavioural protocols such as reducing speed, maintaining safe distances, and switching off engines where necessary. Regular refresher briefings will be provided throughout the project duration.



4.6.7 BHS advice for motorists and drivers of large vehicles can be found at <https://www.bhs.org.uk/go-riding-and-learn/riding-out-hacking/riding-on-roads/advice-for-motorists/https://www.bhs.org.uk/go-riding-and-learn/riding-out-hacking/riding-on-roads/advice-for-motorists/%23advice-for-large-vehicles>

4.6.8 The following instructions will be included in awareness training for construction site personnel. A formal awareness training checklist is provided within **Appendix C** at the end of this report.

Instructions for Drivers and Site Personnel

Slow Down and Stay Alert

- a) Approach horses slowly and be prepared to stop;
- b) Drive at no more than 15 mph when passing horses; and
- c) Be especially cautious near bends, hedgerows, or narrow lanes where visibility is limited.

Give Plenty of Space

- a) Pass wide and slow, allow at least a car's width (around 2 metres) between your vehicle and the horse where possible; and
- b) Never drive too close behind a horse or try to overtake without sufficient room.

Avoid Sudden Movements and Noise

- a) Turn off engines if horses appear nervous or are approaching;
- b) Do not rev the engine, sound the horn, or release air brakes near horses; and
- c) Avoid sudden movements, such as swinging mirrors or tools hanging from the vehicle.

Look for and Respond to Rider Signals

- a) Riders may signal you to slow down or stop, always comply; and
- b) Be aware that some riders may be children or individuals with limited control.

Wait Until It is Safe

- a) Only pass when the road is clear and it is safe to do so; and



- b) Be patient; horses are unpredictable and may spook easily.

Respect Bridleways and Shared Routes

- a) Avoid blocking or parking on bridleways or shared access used by horse riders; and
- b) Ensure delivery drivers know the whereabouts of local routes used by equestrians.

Daily Site Briefings and Induction

- a) Include equestrian awareness in daily toolbox talks and site inductions; and
- b) Highlight local bridleways and equestrian activity in the traffic management plan.

Signage and Communication

- a) Install temporary signage near access points warning of horses in the area; and
- b) Consider communicating with local horse rider groups or livery yards to provide project timelines and coordinate safer access.

4.7 Signage Strategy

4.7.1 During the construction phase, clear construction warning signs will be placed on White Cross road leading to the site access, as well as on the associated approach on the A3058 in accordance with Traffic Sign Regulations and General Directions (TSRGD).

4.7.2 The entrance to the site will be marked by a 'Site Entrance' sign as per the below image, or similar.



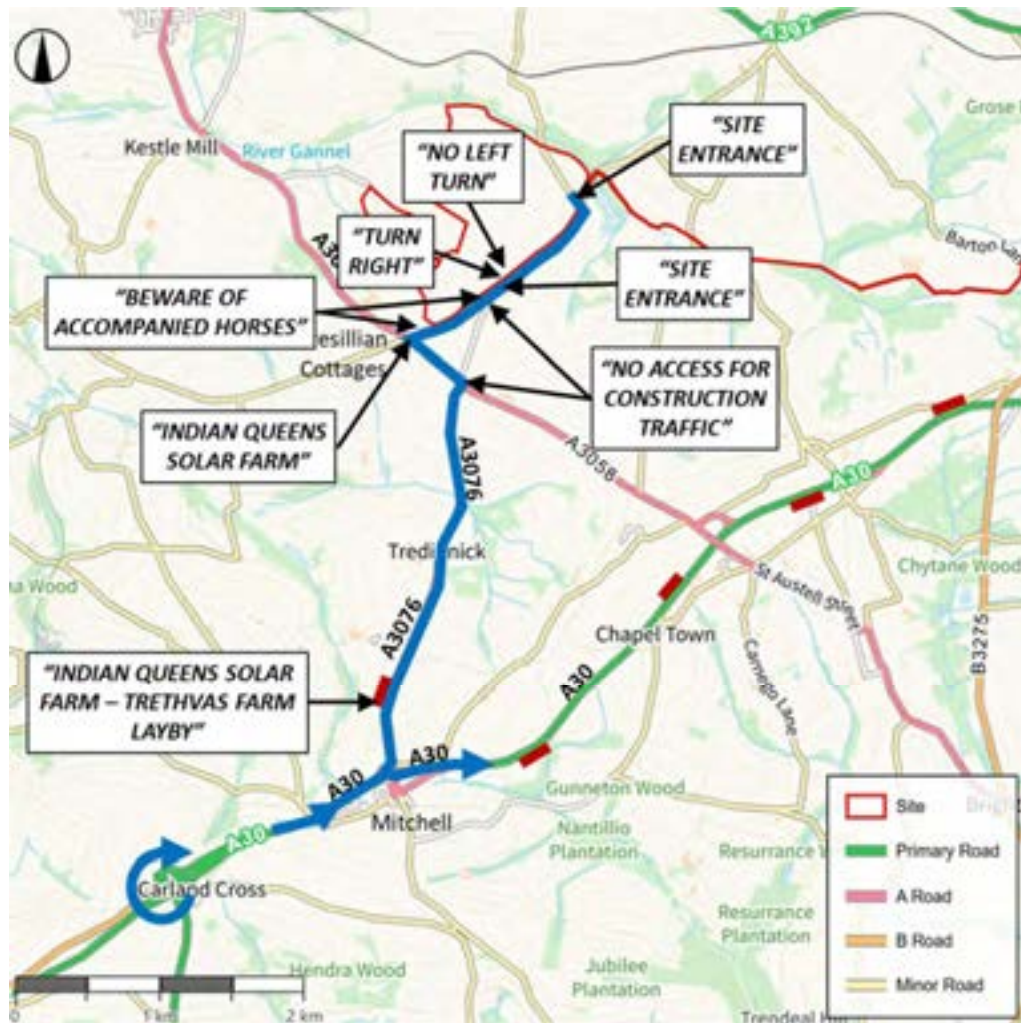
Image 4.2 – Site Entrance Sign



4.7.3 The following signs will be provided on the site / local highway network:

- c) **“Site Entrance”** – at Site Access points;
- d) **“Indian Queens Solar Farm – Trethvas Farm Layby”** – at Trethvas Farm Layby on A3058;
- e) **“Indian Queens Solar Farm Site”** directional signage – at A3058 / White Cross road junction at Tresillian Cottages;
- f) **“Turn Right”** and **“No Left Turn”** – at southern end of site access road upon site exit;
- g) **“Beware of Accompanied Horses”** – on White Cross road close to the site access and at western end of road (close to A3058);
- h) **“No Access for Construction Traffic”** – at northern and southern end of lane that routes north-south opposite the site access and the A3058 / A3076 junction.

Image 4.3 – Signage Strategy



4.7.4 Access to the site will be controlled and all visitors will be asked to sign in and out of the site.

4.7.5 Emergency procedures and location of assembly areas will be made known to all contractors during induction. All contractors and visitors will sign in upon arrival and upon leaving the site.

4.8 Delivery Management

Delivery Booking System

4.8.1 All deliveries and collections of materials and equipment to site must be arranged and agreed in advance. 24 hr Notice is required.

- 4.8.2** Hauliers will be required to contact the Site Manager (or an individual appointed by the Site Manager) to give an indicative delivery time. Approval will then be given, assuming that the Trethvas Farm Layby / site is able to accommodate them at this time, or if not then an alternative time will be discussed and agreed as required.
- 4.8.3** Through discussions with hauliers, the Site Manager (or appointed individual) will ensure that construction deliveries are managed in an efficient manner, with minimal disruptions or delays.
- 4.8.4** Temporary signage would be used to highlight the entrance to the site and the Trethvas Farm Layby. EE will provide banksmen / TMs to assist with the manoeuvring of vehicles to and from the site, as well as internal site movements as detailed further below.
- 4.8.5** To avoid any vehicles idling, sufficient time will be provided between deliveries to allow for any delays (such as loading / unloading taking longer than expected). Deliveries will be managed and scheduled to ensure that no vehicles would have to wait on the surrounding road network for extensive periods, with the approved holding areas being the site itself and the Trethvas Farm Layby.
- 4.8.6** In the event that the Trethvas Farm Layby is at capacity (or not available for use) drivers seeking to access the site will instead be instructed to wait at one of the various laybys on the A30 as shown at **Image 3.1**, or at an alternative formal HGV waiting area on the road network as appropriate.

4.9 Access to Existing Properties

- 4.9.1** There are two existing residential properties at the centre of the site. During construction of internal roads and prior to perimeter fencing being complete, these two properties would avoid the construction area and instead access / egress internally as shown below.



Image 4.4 – Temporary Access Route to Residential Properties



- 4.9.2** Advanced warning and regular update would be made to the occupiers of these properties regarding this alternative route. Signage would be in place at this alternative route and at the principal site access accordingly. The occupiers of these properties would be requested to advise delivery drivers and visitors of this temporary arrangement.
- 4.9.3** Following completion of internal road and perimeter fence construction, it is anticipated that these properties would utilise the principal site access (although some residents may still choose to use the alternative). Right of way would be given to residents along the access route within the site.

4.10 Traffic Marshalls

4.10.1 TMs will be positioned at the following locations. Each TM will be provided with two-way radio communications with the other TMs.

- a) Southern End of site access road at its junction with White Cross road (also serving as gateman and site security);
- b) Trethvas Farm Layby; and,
- c) Western End of White Cross road at its intersection with the A3058 approximately 740m west of site access (peak phases of site activity only).

4.10.2 Any reversing manoeuvres by construction traffic within the site will be controlled by a qualified banksman.

4.10.3 All Banksmen / TMs working on the highway will be New Roads and Street Works Act (NRSWA) qualified, so that they are qualified to control traffic entering and exiting the site.

4.11 Construction Traffic Convoys (Peak Phases of Site Activity)

4.11.1 In order to further improve the overall operation and flow of traffic along White Cross road east of A3058 during peak phases of activity at the site and / or peak seasonal traffic periods, construction vehicles may be directed to travel in convoy to / from the site (2-3 or so construction vehicles at a time).

4.11.2 This measure will reduce the overall level of disruption to users on White Cross road (and wider highway network) through consolidating several construction movements into one convoy and consequently reducing the overall amount of time that White Cross road is occupied by construction traffic than would otherwise be the case.

4.12 Seasonal Peaks and Events

4.12.1 It is recognised that this area is subject to very high traffic flows in peak holiday periods and around local events, such as the Boardmasters festival in August.

4.12.2 Best endeavours will be made to mitigate the impact from site related construction traffic generated during these peak periods through careful coordination and the following procedures:



- a) Avoiding wherever possible construction traffic on the Friday and Saturday morning of a long bank holiday weekend. (Saturday afternoons post 1300 hours, Sundays and Bank Holidays are excluded from construction traffic in any event);
- b) Avoiding wherever possible construction traffic on the days prior to and after major local festivals – e.g. Boardmasters Festival;
- c) Activating the above-mentioned traffic convoy processes at other times during peak summer months (July / August) as considered appropriate by the Site Manager.

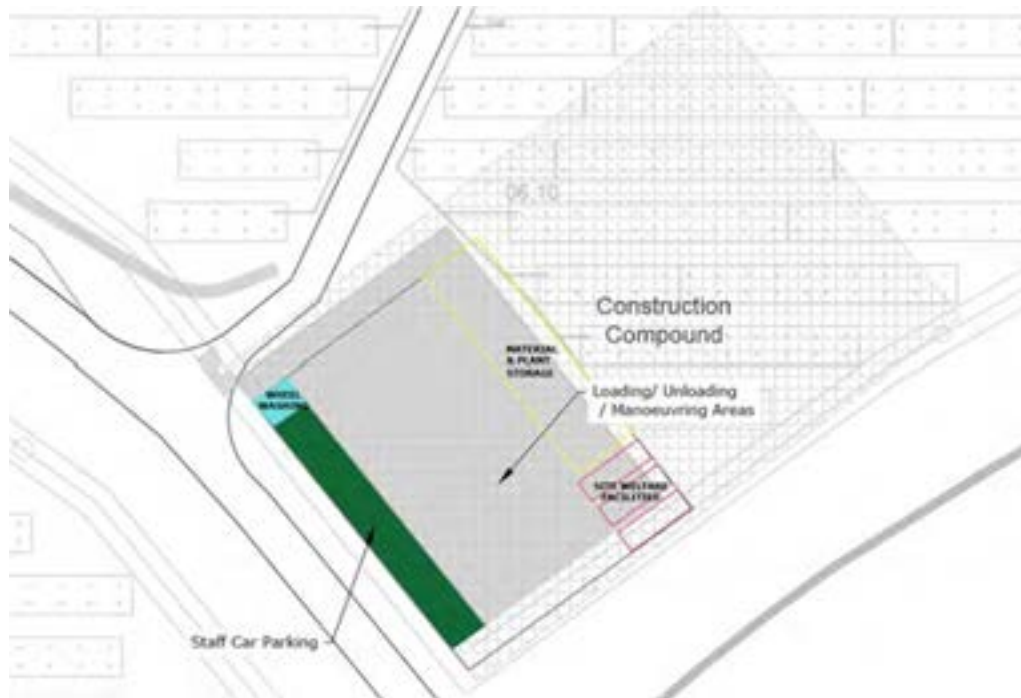
4.12.3 The above list is not exhaustive with the Site Manager free to implement additional measures if appropriate and in line with relevant restrictions, controls and wider objectives of this CMS.

5.0 SITE SAFETY AND FACILITIES

5.1 Construction Compound

- 5.1.1 A construction compound will be provided on-site during the course of the works. The location of the compound is shown at **Appendix A**. Further details regarding the compound layout are provided within the Motion CMS, an extract of which is also shown below at **Image 5.1**.

Image 5.1 – Construction Compound (Extracted from Motion CMS)



- 5.1.2 The compound will contain the following:

- a) Temporary site facilities (Port-a-Cabin type) to be used for site office and welfare facilities, including welfare facilities with provision for sealed waste storage and removal;
- b) Container storage unit(s) for tools and equipment storage;
- c) Container storage unit(s) for components and materials;
- d) Refuelling compound for construction vehicles and machinery;
- e) Chemical toilets;
- f) Adequate parking area for cars, construction vehicles and machinery;
- g) Designated skips for construction waste; and,
- h) Wheel washing facility.

5.1.3 The above provisions will be kept clean at all times. Site facilities may vary over the duration of the project.

5.1.4 It would be a requirement of the project that all personnel working or carrying out deliveries to the site would require as a minimum 3-point PPE (hard hat, hi-vis vest / jacket, and safety boots). Spares will be on site for temporary visitors, if required.

5.1.5 Temporary safety and emergency lighting would be installed and maintained to provide a safe level of illumination in and around the site during the works.

5.2 Environmental Management measures

Dust and Dirt Control

5.2.1 To control, prevent and minimise dirt on the access route and emissions of dust and other airborne contaminants during the construction works, the following mitigation measures will be implemented:

- a) Wheel washing (or dry wheel cleaning) equipment will be available and used on-site within the construction compound, as required, to prevent the transfer of dirt and stones onto the public highway;
- b) All drivers will be required to check that their vehicle is free of dirt, stones and dust prior to departing the site;
- c) Dampening of site roads to minimise dust emissions;
- d) Any soil stockpiles will be covered and / or lightly tracked when left for extended periods of time;
- e) Drivers will adopt driving practices that minimise dust generation including a 10mph speed limit on the internal access roads;
- f) Provision of adequate sheeting of vehicles carrying waste materials; and,
- g) Any dust generating activities will be avoided or minimised, wherever practical, during windy conditions.

5.2.2 An approved mechanical road sweeper will be used to clean the highway of mud or debris that is deposited by site vehicles within the vicinity of the site. The surrounding highway would be monitored daily, and the road would be cleaned with a mechanical sweeper as and when required.



5.2.3 Site Management would undertake a daily checklist, which includes checking route signage and reviewing and arranging for the picking up of any litter on White Cross Road.

5.2.4 The frequency of inspections and cleaning activity would be increased during periods of higher traffic movements or following inclement weather. Cleans will focus on site exits points and surrounding public highway where mud is most likely to be deposited.

Noise

5.2.5 Control measures to reduce the impact of noise would include (but not limited to):

- a) Vehicle noise would be kept as low as possible (e.g. excessive revving of vehicles would not be permitted, engines would be turned off rather than left idling);
- b) Loading and unloading of vehicles around site would be conducted in such a manner such as to minimise noise generation. Where possible, these actions would be conducted away from noise sensitive receptors, such as White Cross road and potential equestrians; and,
- c) Noise complaints, breaches of any Section 60 notices or exceedances of action levels would be reported to and investigated by the Site Manager.

Waste Management

5.2.6 All spoil generated on site as a result of the construction process would, wherever possible, remain on site and aid in the formation of the landscaping proposals. Other wastes would be disposed of using skips.

5.2.7 All miscellaneous waste generated during construction would be tidied into skips / bins on a minimum daily basis, and special waste; for example Control of Substances Hazardous to Health Regulations (COSHH) waste; would be put into containers appropriate to its nature, where relevant.

5.2.8 All statistics associated with waste generation and reprocessing would be collated on a monthly basis and stored in the site waste management file.

Staff and Visitor Parking

5.2.9 No parking will be permitted on the public road network or at any other off-site locations at any time (aside from the Trethvas Farm Layby).



5.2.10 Designated car parking for staff and visitor cars / vans will be provided within the on-site compound area as shown at **Image 5.1**. Staff and visitors will be required to park in this area only at all times.

5.2.11 Special precautions will be taken when catering for any disabled staff / visitors to ensure that all access / egress to parking and other facilities are safe, practical, and reasonable.

Site Security

5.2.12 To ensure safety and security, the site will be enclosed with security fencing and access will be restricted by a locked gate.

5.2.13 The perimeter security fencing will be erected at the outset of the construction phase and will remain in place throughout the operational period until the solar farm is decommissioned.

5.2.14 Access to the construction site during working hours will be managed by personnel stationed at the entrance. All visitors will be required to sign in and out with site security.

5.2.15 All site visitors will receive a Health and Safety induction, be provided with appropriate Personal Protective Equipment (PPE), and must be accompanied by a qualified escort at all times while on-site.

Storage

5.2.16 A temporary laydown area for plant, equipment and construction materials will be provided on the site - at the compound area identified at **Image 5.1**.

5.2.17 During the winter months when the hours of daylight are reduced, and the construction site is open, temporary lighting will be provided within the laydown compound. This lighting is required to ensure the safety of operatives and delivery drivers. There is a risk that the lighting could cause 'light pollution' or be a distraction to users of public roads, or neighbouring residential properties. To mitigate this risk only temporary lighting that can be angled and baffled will be used.

5.2.18 The Site Manager will conduct an audit of all temporary lighting immediately after its first installation to ensure it is fit for purpose and avoids the creation of light pollution.



5.2.19 All materials on site will be stored in accordance with the Control of Substances Hazardous to Health (COSHH) regulations and supporting COSHH assessments and data sheets.

6.0 COMMUNITY ENGAGEMENT, REPORTING AND ENFORCEMENT

6.1.1 It is important that members of the public and other interested parties are kept fully informed about the construction works and are able to raise any issues that may arise during the course of the works. Measures set out within this CMS seek to avoid potential impacts on sensitive receptors as much as possible.

6.1.2 Valid complaints can provide a valuable feedback mechanism, which could help reduce identified potential impacts on sensitive features or sensitive areas and also allow the construction traffic routing and site procedures to be assessed, refined, and improved.

6.1.3 Community engagement, reporting and enforcement will be managed through coordinated on-site and project-wide contact arrangements, ensuring that issues can be raised easily, responded to promptly and addressed proportionately.

6.2 Site Management and On-Site Contact

6.2.1 The Site Manager will act as the single point of contact for on-site and immediate site-related matters throughout the construction programme.

6.2.2 The Site Manager is responsible for:

- a) Ensuring that site activities are undertaken in accordance with this CMS;
- b) Responding promptly to site-specific concerns raised by local residents, highway users or businesses;
- c) Implementing immediate corrective action where necessary; and,
- d) Providing feedback on actions taken, either directly or through European Energy UK where appropriate.

6.2.3 A Site Notice Board will be installed at the site entrance and will clearly display the Site Manager's name and contact details (telephone and email), together with emergency contact information, enabling members of the public to raise concerns directly.

6.3 European Energy UK Project Communications and Community Liaison

6.3.1 Project-wide communications, stakeholder engagement and grievance management will be coordinated by the Project Communications Manager for European Energy



UK (details below) who will act as the primary project-level contact for residents, parish councils, elected representatives and other stakeholders.

- a) Lisa Wilson
Project Communications Manager – European Energy UK
Email: liwi@europeanenergy.com
Telephone: +44 7508 817 113

6.3.2 In this role, the Project Communications Manager will:

- a) Lead community engagement and communications in coordination with the Site Manager;
- b) Prepare and issue resident letter drops and project notifications;
- c) Manage the dedicated project website for the Tregonning Solar Farm and co-located Battery Storage Facility, including the provision of regular updates and posts;
- d) Receive, log and manage project-related queries, issues and incident reports via email, telephone and the website reporting form;
- e) Administer the EEUK grievance process and maintain the grievances log in accordance with the EEUK Grievance Policy and Procedure; and,
- f) Liaise with the Site Manager and wider project team to ensure issues are investigated, actions agreed and feedback provided in a timely manner.

6.3.3 Where concerns extend beyond immediate site matters or cannot be resolved promptly on site, they will be escalated and managed by European Energy UK, with ongoing communication maintained until the matter is appropriately addressed or closed.

6.4 Community Information and Advance Notice

6.4.1 European Energy UK will issue letter drops to local residents prior to the commencement of construction and at key stages of the programme. These will include:

- a) Key construction dates and working hours;
- b) Contact details for both the Site Manager and European Energy UK;
- c) An overview of the proposed development;
- d) A summary of the construction phases;
- e) Information on the designated construction traffic route; and,



- f) A Frequently Asked Questions (FAQs) section addressing anticipated queries.

6.4.2 European Energy UK acknowledges that the construction of the development may cause temporary inconvenience. The construction process will be carefully managed to ensure the safety of users of the existing highway network and local residents and businesses, with appropriate measures in place to mitigate potential impacts.

6.5 Grievances, Oversight and Enforcement

6.5.1 All complaints and concerns received during construction, whether via the Site Manager, European Energy UK, the project website or third-party schemes, will be managed in accordance with the EEUK Grievance Policy and Procedure.

6.5.2 The development will be registered with the Considerate Constructors Scheme (CCS). The CCS recognises the impact that construction activity can have on local communities, and on those living, working, or travelling in areas where construction is taking place. The CCS Public Support Team provides an independent, route for members of the public to raise concerns, comments or compliments, which will be investigated and addressed in coordination with the construction team where possible.

6.5.3 The Site Manager is responsible for day-to-day enforcement of this CMS, while European Energy UK retains overall responsibility for monitoring compliance and securing corrective action where required.

6.6 Communication with Suppliers

6.6.1 An information pack will be distributed to all suppliers involved in the transport of materials and plant to and from the site. The pack will be a convenient size so it can be stored in a truck cab.

6.6.2 The pack will include key information on delivery routes and will clearly set out the abovementioned procedures, as well as those for dealing with emergencies and disciplinary measures for non-compliance.

6.6.3 Emergency procedures and location of assembly areas will be made known to all contractors during induction. All contractors and visitors will sign in upon arrival and upon leaving the site.

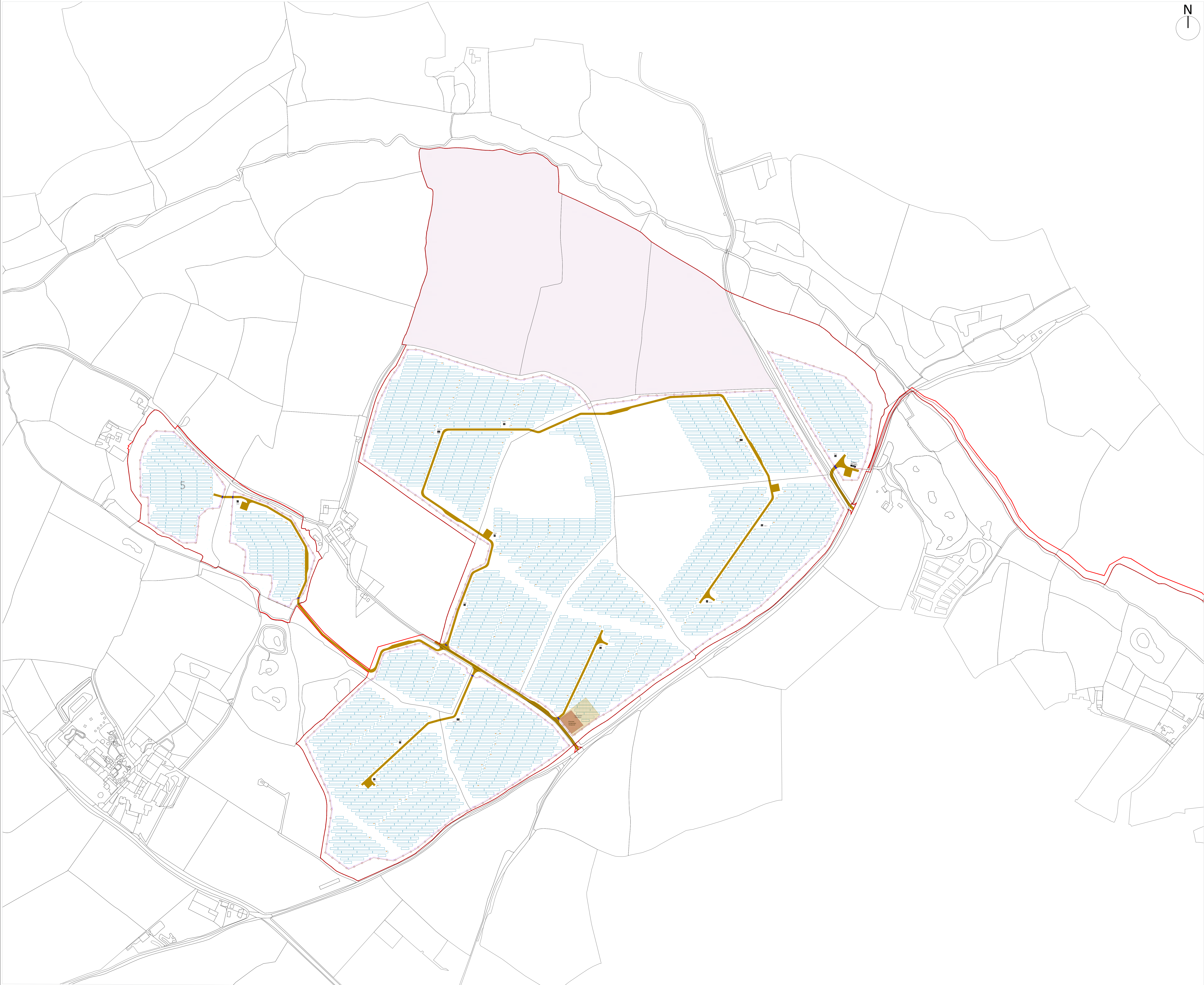


6.7 Enforcement

- 6.7.1** Should any driver be observed violating the traffic management procedures or be in breach of the rules, either through direct observation or via a public complaint, will be subject to disciplinary action that may lead to expulsion from the site.
- 6.7.2** If necessary, reminder notices outlining correct procedures will also be circulated to all contractors.
- 6.7.3** This policy is intended to promote accountability and ensure that all personnel contribute to a safe and respectful working environment for both site operatives and the surrounding community.

Appendix A – Approved Site Layout Plan





PROJECT NAME	Indian Queens
PROJECT NO.	UK041
ADDRESS	Tregonning Farm, Kestle Mill, Newquay, TR8 4PR
COORDINATES	50.386667°, -4.996944°
1st DWG DATE	23/10/2024
DRAWN BY	MPR
CHECKED BY	MWE
APPROVED BY	MWE
FORMAT	A0@1:2500
SCALE	0m 20m 40m 60m 80m 100m 200m

LEGEND		
	FT Structure 2P28 (1789)	
	FT Structure 2P14 (334)	
	MV Transformers	
	MV Transformers + SWG	
	Customer substation	
	Maintenance Road	
	Hedge	
	Gates	
	Fence	
	String inverter	
	Proposed cable route to substation	
	Planning boundary	
	Skylark mitigation area	
	CCTV line	
REVISION LOG		
REVISION	DATE	NOTES
P-001 RV01	05/11/2025	Update layout
P-001 RV02		
P-001 RV03		
P-001 RV04		



EUROPEAN
ENERGY

Gyngemose Parkvej 50, 2860, Søborg, Denmark
www.europeanenergy.dk

PLANNING LAYOUT

P-001

Appendix B – Discharge of Condition 14





Louise Braine
DWD
69 Carter Lane
London
EC4V 5EQ
United Kingdom

Your ref:
My ref: PA25/08997
Date: 16 December 2025

Dear Sir/Madam

Submission of details to discharge Condition 14 in respect of Decision Notice
PA22/01511 dated 05.12.2023
at Land East Of Tregonning Farm Kestle Mill Newquay Cornwall TR8 4PR

I refer to the details submitted in respect of the above.

I confirm that the details submitted are acceptable and that you have satisfied the
following condition(s):

Condition Number 14 Discharged on 16 December 2025

This does not relieve you of your obligation to comply with the Building Regulations or
with any condition(s) on the original planning permission.

Yours faithfully

Jeremy Content

Principal Development Officer
Development Management Service
Tel: 01872 322222

Development Management Service
Cornwall Council

Correspondence Address: Cornwall Council Planning Dept, New County Hall, Treyew Rd, Truro, TR1 3AY
planning@cornwall.gov.uk

Tel: 0300 1234 151 www.cornwall.gov.uk

Appendix C – British Horse Society Guidance Notes and Driver Checklist



HGV Driver and Site Personnel Training Checklist – Equestrian Awareness (per BHS Guidance)

Equestrian Awareness Training Checklist

Drivers

Speed and Approach

- i) ☐ Drive at no more than 10 mph when approaching or passing horses.
- i) ☐ Always be prepared to slow down or stop completely when horses are nearby.
- ii) ☐ Stay vigilant when approaching blind corners, hedgerows, or narrow rural roads.

Passing Safely

- i) ☐ Only overtake horses when it is safe and with a minimum distance of 2 metres where possible.
- ii) ☐ Never overtake if the road is too narrow or if the horse appears agitated.

Noise and Engine Management

- i) ☐ Avoid revving engines, sounding the horn, or releasing air brakes near horses.
- ii) ☐ Turn off engines if a horse appears distressed or if asked to do so by the rider.
- iii) ☐ Avoid sudden movements, swinging doors, or unsecured equipment that may startle horses.

Rider Communication

- i) ☐ Obey hand signals from horse riders requesting vehicles to slow down or stop.
- ii) ☐ Treat all horse riders with patience and courtesy—some may be children or inexperienced riders.

Site Personnel

Site Inductions and Toolbox Talks

- i) ☐ Equestrian safety procedures must be covered in all driver/site inductions.
- ii) ☐ Conduct regular toolbox talks to reinforce awareness of horse rider presence and protocols.



iii) ☐ Brief new drivers daily on known bridleway locations and routes used by riders.

Signage and Local Engagement

- i) ☐ Erect temporary signage warning of horses on or near access roads.
- ii) ☐ Maintain communication with local riding schools, livery yards, or equestrian groups to share information on works schedules and access.

Route Planning and Parking

- i) ☐ Avoid parking or blocking bridleways, gateways, or shared-use paths.
- ii) ☐ Ensure HGV access routes are planned with equine safety and visibility in mind.

Confirmation:

☐ I have read and understood the above safety procedures and agree to comply fully while operating vehicles or working near horse riders during this project.

Name: _____ Signature: _____ Date: _____

Company: _____ Vehicle/Role: _____



The law and management of public access rights vary widely between the four countries of the United Kingdom. Practical elements of the following advice apply in all of them but the legal requirements in Scotland and Northern Ireland differ from those in England and Wales.

More advice is available on www.bhs.org.uk/accessadvice.

IMPORTANT This guidance is general and does not aim to cover every variation in circumstances. Where it is being relied upon, The Society strongly recommends seeking its advice specific to the site.

Contents

On site	1
Horses' reactions	2
Obstruction and surface.....	2

This guidance is intended for those responsible for any construction site ('the site') in the vicinity of routes or areas used with horses (ridden or driven) such as bridleways, byways, roads, permitted paths and open access areas which may be adjacent to or crossing the site.

This advice applies equally to any work site where noise or movement may occur, e.g. tree-felling, ditch clearance, vegetation cutting, alongside a road, byway or bridleway or other route used with horses.

On site

The Health and Safety specification and briefing for all attending the site should include a section covering use of routes or areas by horse-riders and drivers (equestrians) with the guidance below.

All members of the construction and operational work force and visitors should be made aware of the equestrian routes or areas affected by the site.

If a banksman is employed to control vehicle movements and activities they should be fully briefed about the possibility of horses being in the area and the necessary actions to be taken for the safety of horse and rider or driver and others in the vicinity.

Warning notices should be displayed in advance of reaching the site describing the hazards for both equestrians and the construction site workers or visitors and requesting the co-operation of all.

Horses' reactions

Horses are not predators so their instinct is to run away from the unknown or threatening. Sudden noise and movement are likely triggers and horses can sense, see and hear things which humans may not be aware of or take for granted. Quiet rustlings and sudden bangs are often more of a trigger than a continuous mechanical noise such as a digger working.

Only horses know what they are thinking. One day they may react to something they've previously ignored, or we think they are doing, they might be reacting to something invisible or unheard by us and we assume it is what we perceive as a likely factor.

However, sudden movement or noises are most likely to trigger a reaction. A machine making a movement is more of a threat than one that is still, although even a still machine where there has not been one before may unsettle some horses. Operators must be able to shut off machinery or to stop movement and noise while horses pass and avoid starting up a machine or initiating movement while horses are in range.

Machinery or activity should not resume until horses are at least twenty metres past. If it is not possible for activity to be halted, staff should be at the location to warn approaching equestrians as appropriate. Such 'sentries' should be obvious on approach, not hidden behind a tree or equipment as suddenly appearing could be an additional stress factor causing a horse to react.

If a horse appears distressed—freezes, jerks sideways, prances about, takes flight, spins round or shies away or acts in any way other than a calm forward motion—or an equestrian appears to be struggling for control, or shouts, all movement and noise should cease immediately to avoid escalating the situation.

Activity should not resume unless the equestrian indicates that it is safe to do so or is out of sight or more than fifty metres away.

Do not resume as soon as a horse has become still as the rider may not yet have regained control and the horse may not have accepted the situation but be taking stock and easily frightened again. Wait until the equestrian signals that it is safe to continue, with a wave, smile, nod or call, or is out of range. They may have too much on to vocalise a thanks, so please take it as given!

Obstruction and surface

Access to any public highway must be unrestricted (a bridleway or byway is a highway). A route must be kept free of obstruction, debris and trip hazards and for the full width of

the route. Obstructing part of the width is still illegal even if you think there is space to pass. Horses will require a much greater width to pass safely than might be considered appropriate for a pedestrian. Tight spaces are more likely to trigger a reaction, especially in conjunction with noise and movement.

The surface of equestrian routes should be maintained in a manner suitable for horses. It must not be slippery or contain sharp stones (see BHS Advice on Surfaces www.bhs.org.uk/accessadvice). Existing grass or soft surfaces may need to be protected from construction traffic to avoid poaching or other damage.

Any temporary fencing alongside the route must be secured taut and not flapping in the wind. 'Heras' type security fencing is sometimes covered with plastic sheeting to prevent windblown debris but it is almost impossible to secure so that it does not flap and rustle in wind and it should never be used alongside routes used with horses unless it can be secured tightly enough and remain taut at all times. Frequent checks, especially in breezy weather, will be required with diligent attention to maintaining the sheeting taut. Also avoid loose packaging on stored material which may move in wind and be audible or visible from the horse route.

Similarly, flags (traditional and 'feather' flags) and banners should be avoided near equestrian routes. Flags are commonly used promotional items but can cause great difficulty for equestrians with horses not trained with them. The high level of movement that makes them striking for promotion is exactly what makes them hazardous on an equestrian route.

A route should be at least four metres wide to ensure that users can pass each other with ease without brushing against adjacent fences, walls or hedges. Vegetation should be cut so that the full width can be used if necessary.

Hazards overhead such as branches, cables or derricks should provide at least 3.4m clearance, preferably 3.7m in case a horse takes fright and jumps or rears.

For wind energy development sites, see the BHS publication Wind Turbines and Horses – Guidance for Planners and Developers on www.bhs.org.uk/accessadvice.

If this is a saved or printed copy, please check www.bhs.org.uk/accessadvice for the latest version (date top of page 2).

Advice on Solar farms near routes used by equestrians

The law and management of public access rights vary widely between the four countries of the United Kingdom. Practical elements of the following advice apply in all countries but the legal requirements in Scotland and Northern Ireland may differ from those in England and Wales.

More advice is available on www.bhs.org.uk/accessadvice.

IMPORTANT This guidance is general and does not aim to cover every variation in circumstances. Where it is being relied upon, The Society recommends seeking advice specific to the site.

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Where solar farms are proposed, the potential impact on horses should be considered on any route used with them — including byways, bridleways, roads and permissive routes — which may be affected during or after construction, and premises where horses are kept or trained.

The Society does not have a position on the principle of renewable energy. Whatever the feeling of local equestrians, change from a semi-natural environment by building a solar farm is unlikely to be a 'material planning consideration' with any weight to affect planning permission. Therefore, the Society's work focuses on gains for equestrian access, and mitigation of the development on existing bridleways, byways and roads, during construction as well as in the completed project.

Solar arrays and local effects

Electricity is generated from solar panels by daylight, not just direct sunlight, and, with the improvement in solar panel technology, the intensity of the daylight in much of Britain and Ireland may generate enough electricity for solar farms to be viable further north than was previously the case.

A solar farm involves the installation of solar photovoltaic panels on open land, usually land which is even across the site, to avoid having to compensate for undulations, which would require greater spacing between ranks of panels. Flat land is more likely to be used than a hillside for ease of installation, maintenance and to reduce visual impact.

Standard photovoltaic panels are fixed on frames mounted on vertical supports, called arrays. They are aligned for optimum exposure to sunlight by their orientation and angle to the sun, normally facing south and tilted to around 45 degrees depending on latitude. The arrays will be spaced to avoid shading by the next row at any time of year.

Their height above ground is usually up to 3.5m, but that may change as designs advance in this developing industry. The static panels do not make any noise or movement and require little maintenance, other than cleaning and vegetation control.

Tracker arrays rotate the panels to maximise generation as they follow the sun through the day at an optimum angle to the sun's rays. They may be higher than static arrays. Their higher cost of build, installation and maintenance is only just becoming viable so they are an unknown entity in relation to horses. Some may be proposed for part of a site as a trial or a mixed site. They can increase generation so may become more common.

The frames to support arrays are piled into the ground and can be removed when the site is decommissioned. The piling operation is the most intrusive part of the build project.

Trenches may run between the arrays and carry cabling to an inverter in small buildings where the direct current produced by the panels is converted to alternating current and fed to the national grid.

Battery storage of energy may be incorporated in a large site to improve management of transmission to the national grid.

Panels are designed to absorb and not reflect light for efficiency (reflected light is wasted energy) and although the amount of reflection varies with the materials, the incidence of 'glint and glare' is negligible compared with glass or water and will not be uniform throughout a period of sunlight.

Rain hitting the panels will make a gentle sound which may be lost in the general ambient noise in those conditions, although, obviously, the greater the extent of panels, the greater the cumulative effect of the noise may be, however, even in heavy rain, it is similar to roofs of barns or a retail or industrial site.

Depending on the previous use of the land and its quality, it may become grassland that can be used to graze sheep or poultry to reduce the need for vegetation cutting. Some land of solar farms is deliberately managed to increase biodiversity, and there is increasing evidence of a high benefit to nature.

There is no evidence of widespread contamination of grazing or ground water from toxic minerals. Panels are no longer manufactured with lead, and other minerals are in small quantities, encapsulated within the panels. Breakage of a panel on site could release minerals, but there should be a protocol in place to avoid contamination of the land. End-of-life panels will be removed from site.

Solar farms are straightforward to build, involving erecting the frames which hold the panels, underground cabling and small buildings to house inverters. Tracks may be built to facilitate vehicle movements around the site during construction or for subsequent maintenance.

Considerations for a solar farm development

As part of the planning process, the developer will conduct a range of studies, typically to find out about the existing ecology and other aspects of the site. The effect on public rights of way should be included in these studies, however, it is commonly omitted, particularly the effect on horses may not be addressed.

The results and the design for the solar farm will make up the planning application, possibly a pre-planning local consultation, so the accommodation of equestrians and public rights of way should be clear at an early stage and, if omitted, the effect and desired mitigation pointed out.

The construction phase of an average 40-acre site is likely to be around 16 weeks. Over this period there could be 100 lorry deliveries to the site, possibly more. More recent applications have been for much larger developments, although the site is often broken into 'fields' which are not adjacent, so the corresponding traffic volume may be greater. Components are not large so abnormal load vehicles should not be required.

The application should include a **Traffic Management Plan** for the construction process with details of vehicle type, number of movements per day, and the routes to be taken. The increased traffic and its character can have a high impact on equestrians when the identified route is along roads which equestrians have no choice but to use either because there are no bridleways or to reach bridleways (or other non-motorised routes).

The life of a solar farm has usually been 25 years, sometimes with an option to renew for a further period, however, applications are now being made for a longer initial period. Planning permission may specify a return to original use without extension.

Planning authorities will normally require that a proposal will minimise disturbance to agricultural land and reduce visual impact. As even large solar farms are considered temporary, all the structures and tracks may be required to be removeable.

Summary of factors affecting equestrians (detail follows)

Factors which could affect equestrians and should be considered during the planning phase are:

- Construction traffic increase on roads and impact on equestrian safety should be avoided by careful traffic management and provision of alternative routes for equestrians.
- Bridleways and byways across the site should be retained or diverted with widths great enough to avoid the arrays over-shadowing the routes.
- Use of bridleways or byways as construction roads must be avoided as it will irretrievably damage their character if they are 'green' paths and may close them to the public for the duration of construction.
- Post-construction access roads must not coincide with bridleways or byways because public access is needed at all times which may conflict with security demand for the site.
- Damage or change to surface of bridleways or byways to install cables should be avoided by re-routing cables or by directional drilling if unavoidable.
- Effect on drainage from new hard surfaces and increased speed of run off must be accommodated to avoid poaching of bridleways and byways.
- Damage from installation of fencing must be avoided and the effect of fencing on the character and enjoyment of adjacent routes mitigated.
- Constraining width of bridleways or byways can feel intimidating with the loss of adjacent open space.
- Additional access opportunities may be achievable for perimeter or cross-development routes.
- Inverter buildings near rights of way should be constructed to minimise transfer of sound.
- Tracker arrays should not be adjacent to bridleways or byways until their noise and movement can be assessed for impact in mature developments.

Traffic Management Plans

Construction traffic will create vehicle movements relative to the size of the site, and is likely to be much greater on some days and periods but can be managed to condense vehicle movements to mitigate effect.

The impact on residents and traffic flow or delays for motorists will be considered but not on other road users, such as equestrians. This is a point of highway safety which is a Material Planning Consideration. Unfortunately, alternative roads for either the construction or the riders rarely exist, but an off-road route, most commonly using a field edge alongside the road, may be negotiated for non-motorised users and compensation paid by the developer to the owners of the land over which it passes, for the duration of the unusual traffic period. This is only likely to occur where there is a high number of local riders to justify it, perhaps between a large livery yard and a bridleway. Alternatively, where verges are adequate, mowing and flattening them may provide a refuge strip for equestrians.

Drivers should be reminded of the highway code and BHS guidance to pass horses at 10mph, by at least 2m.

In summary, a Traffic Management Plan should include the safety of users of rights of way both on and adjacent to the site and on roads used in the locality. It may be appropriate for construction traffic to be restricted to:

- Limited hours and / or days of the week so that equestrians have options to avoid increased traffic
- Limited routes, so roads most important to equestrians are avoided.

Use of bridleways and byways for access

Bridleways, byways and unsurfaced roads **should not** be used for site access. If it is unavoidable, and accepted by the highway authority's rights of way service,¹ in consultation with the BHS, every effort should be made to ensure that the surface will be maintained and restored to a surface material suitable for horses after construction of the solar farm.

An alternative route for equestrians should be provided during construction to minimise disruption and to ensure users' safety. It is unacceptable to close off-road routes where roads are the only alternative when those same roads are also busier because of the construction traffic.

Closures without alternative routes should be avoided and, if necessary, construction traffic managed to reduce the length of closures, rather than an automatic blanket closure throughout the period of construction.

¹ The highway authority *rights of way service* is emphasised because the planning department or highways (roads) a service may not be aware of the law that it is an offence to disturb the surface of a public bridleway or byway and cannot authorise disturbance or change to the surface

Cabling across or along bridleways and byways

Grass tracks are the most desirable for most horses and many pedestrians, as well as providing green corridors to benefit nature and human health and well being (rarely achieved by asphalt or hard surfaces). Damage to a good natural resilient surface is commonly a negative impact of a development because it may not be possible to reinstate the surface, and yet another grass track is lost.

Damage from vehicles engaged in the cable-laying can be minimised by using temporary protective tracks on which the vehicles run, and removed to leave minimal effect on the surface.

When responding to a planning application for a solar farm, always consider the cable routing and its impact on bridleways and byways, it is often missed in consultations and the damage to surfaces can badly disadvantage equestrians, especially where reinstatement is not enforced or it is replaced by a sealed surface.

Cables should not cross or be laid along rights of way unless by directional drilling, or unless the surface of the bridleway or byway is historically poor and the development is an opportunity to improve it *for all users, including equestrians*.

Authorisation will be required from the highway authority's rights of way service² to disturb the surface of the right of way. Acting without authorisation is an offence. The surface must be reinstated to a firm and safe condition within a set period, which should be as short as possible to minimise inconvenience to users. If the surface is not reinstated, the authority can restore it and charge the cost to the landholder. The finish must be one that is suitable for horse use.

Noise

There will be noise during construction, particularly from pile driving, which is unpleasant and potentially distressing, but its temporariness means it is not usually a material planning consideration. Similar to traffic movements, restrictions are possible to reduce the impact to specific hours and days, and for provision of an alternative route when piling is close to an equestrian route.

Drainage

Drainage provision for the radically changed surface of a solar farm compared with greenfield land must be accommodated to prevent detrimental effects on equestrian

² The highway authority *rights of way service* is emphasised because the planning department or highways (roads) a service may not be aware of the law that it is an offence to disturb the surface of a public bridleway or byway and cannot authorise disturbance or change to the surface

routes on and adjacent to the site and for some distance away, depending on drainage patterns, outflow and the terrain.

Hard surfaces create a different drainage situation from an open field as run-off is immediate and much higher in volume. The extensive surface area of the panels could change the nature of the drainage. Existing drainage may not be adequate to cope with the changed run-off and a holding pond may be required. New drainage to protect equestrian routes is essential to ensure they are not affected. This must be considered well beyond the site itself so that flash flood damage does not occur.

Equally, land which has a higher density of natural vegetation because it is no longer cultivated or heavily grazed may be able to absorb more water, therefore reducing speed and immediate volume of run-off from the site.

The effect of the construction process and vehicular access on drainage should also be considered. Levelling a site, soil stripping, trenching for cables, compaction and creating access tracks will all affect the drainage of the site and should be provided for in the construction phase so that there is no adverse effect on equestrian routes.

Hard surfacing routes which currently have an adequate natural surface should not be the automatic answer; it is usually better to preserve the existing surface by attention to drainage and protection from damage, perhaps using geogrid products. However, if the existing surface is poor, the opportunity for upgrading the surface with a finish suitable for horse use should be taken if appropriate.

Fencing

Solar farms are valuable investments and are usually secured by fencing which may include hedge screening, although the latter will take years to establish. The most common type of fencing in use is 'deer mesh' type 1.8 to 2m high, which is the least intrusive. It can be stipulated in the planning permission so as not to feel oppressive if fencing is alongside a bridleway or byway.

If bridleways or byways are alongside or through sites, care must be taken not to create a narrow corridor. Fencing can be intimidating, especially at this height, and create a need for vegetation control, or, if solid, create a drainage or poached surface problem by preventing light and air reaching the surface. A narrow corridor may also potentially create conflict from users being confined, with no 'escape space' from a threat as would be the case with an open field. The need to maintain adjacent hedges and surface vegetation so as not to further reduce the available width should also be considered, as well as vehicular access for maintenance if appropriate.

Unless the recorded width of the bridleway or byway is greater, a minimum **useable** width of 4m between fences is recommended, meaning fencing at no less than 5m apart to allow for the strip immediately adjacent to the fence being unusable, and with vegetation cut through the full width. This mitigates the enclosed effect of the corridor of the right of way between high fences.

Where a bridleway or byway has been previously unfenced, it is likely that the used width has been at least 4m as users do not risk passing each other more closely than necessary, particularly on multi-use routes where horses, bicycles, pedestrians and dogs may be present.

Use of open mesh fencing is usual except around inverter housing or battery storage where security fencing may be required. The latter can be intrusive in the landscape and may create unpleasant and intimidating alleys in any location unless the public right of way is given enough width. Metal palisade fencing with spikes on top should be avoided next to equestrian routes as its rigidity and sharp edges have safety implications for riders. Although the standard height is above the head for a pedestrian, its top is likely to be at or below chest height for a rider and will result in injury if a rider is thrown onto or against such a fence.

Security

After construction, traffic to the solar farm will be minimal, with occasional maintenance visits and ground maintenance through mowing or livestock management. If the site is currently farmed, usually it is maintained so that it can revert to agriculture after the life of the solar farm.

Access roads must not coincide with bridleways or byways. There may be a wish to restrict vehicle access to the site to minimise theft or vandalism. Anti-vehicle barriers cannot be authorised on bridleways or byways for the purpose of security, only to control livestock or to safeguard users of the right of way. The site must therefore only be permitted if it can be secured without affecting bridleways, byways or public roads.

On permissive paths, barriers should conform to BHS Advice on gaps, gates and vehicle barriers to ensure safety of users.

Alternative or additional access

Large developments are opportunities for increasing access, particularly those which contribute to community funds. There may be chance to upgrade a footpath to bridleway or to gain an additional route. Even short links can have important benefits by enabling greater or safer use of existing routes in an area.

It should not be necessary to divert a bridleway or restricted byway (a byway open to all traffic cannot be diverted under normal circumstances) as arrays can be arranged around the route. However, this might reduce the number of panels that can be accommodated and there may be a proposal to divert a route to the edge of the site. In some cases, this may be acceptable if it provides a more advantageous route, but not if it is less convenient or attractive to users. Diversions should be avoided, unless the proposal is more desirable than the existing route, as the solar farm is a temporary structure. If it is

essential to divert a convenient route, consideration should be given to it reverting to the original line on expiry of the planning permission for the solar farm.

Battery storage

Some solar farms may include battery storage to allow better management of energy flow to the grid. Siting of batteries should be considered carefully in relation to bridleways and byways because of the fire risk. Apart from the immediate health and safety risk, such fires are difficult to control, produce high levels of toxins, so closure of all public access may be required. In addition, access routes may be severely damaged by operations to attend the fire so access routes that avoid bridleways and byways are essential.

‘Glint and glare’

The UK government’s National Policy Statement for Renewable Energy Infrastructure. (Nov 2023) says:

Most commercially available solar panels are designed with anti-reflective glass or are produced with anti-reflective coating and have a reflective capacity that is generally equal to or less hazardous than other objects.

The Society accepts this statement as an accurate description of solar panels as much less reflective than glass, such as vehicle windscreens, roof windows, conservatories or greenhouses at similar angles, all of which are common in the landscape and accepted by horses, who will have seen reflections from glass and water since their birth. If any reflection does occur, it is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen rather than glare even on a bright day.

Increasingly, proposals for solar farms include comment on the impact of ‘glint and glare’. The Society has no evidence of ‘glint and glare’ from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses.

Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider.

Horses may react to a new solar structure as they might to anything different in their environment, but will quickly accept it (when introduced appropriately). Such reaction is simply to a change in their surroundings, it is not likely to be a response to reflection because their handlers report no reflection from panels. Although horses’ vision is different from humans, their response does not suggest that they see panels differently.

Planning conditions

Where a solar farm is proposed, conditions can be imposed on planning permission to ensure the points above are included. The primary ones are:

- Routes for construction traffic should avoid passing along or across equestrian routes, including byways and bridleways. Where such use is unavoidable, provision of safe alternatives for the duration of the development, or protection of the equestrian access, should be in place.
- Existing bridleways, byways or other highways across the land should be provided for at no less than 5m width between fences and ideally greater to preserve a feeling of openness, if that is currently the situation.
- Inverter housing should be constructed to avoid sound transmission and sited away from bridleways and byways to ensure operational noise and maintenance is at a distance.
- Battery storage should be sited away from bridleways and byways to ensure operational activity is not nearby.
- Additional opportunities for equestrian access should be considered.

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