

Dear Mr Greaves

**Land West of Ashwell Road, Bygrave - Solar Plant  
26/01224/S73: Variation of Condition number 26 (CTMP) of planning  
permission reference (22/00741/FP), as amended by information received  
16 July 2026 and with additional supporting information published on the  
NHC planning portal on 15 September 2026**

I am writing to you in my capacity as Chairman of Bygrave Parish Council.

**Introduction**

I wrote to you on 1 June 2026 and 5 August 2026 setting out the objections of Bygrave Parish Council to the Section 73 applications to vary Planning Conditions 26 and 29 submitted by Pathfinder Clean Energy (PACE). In my letters, I requested that we be provided with specified information which had been referred to by PACE (and/or its advisers) in the documentation submitted to support its Section 73 applications but which had not been made publicly available via the NHC planning portal.

We have now received the requested information along with some additional traffic related information and I set out in the attached document my comments on this newly provided information. Our key findings are:

- January 2023 surveys used to assess the suitability of the proposed construction route and necessary mitigations, understated usual traffic volumes, traffic speeds and non-vehicular use.
- The proposed revised daily limit on articulated lorry movements would be a material increase in articulated lorry movements; potentially a quadrupling.
- Commitments given by PACE at the planning application stage with regard to traffic management have not been included in the Construction Traffic Management Plan.

Our position is unchanged in that we strongly object to PACE's application to vary Planning Condition 26 and Planning Condition 29.

**Late provision of information relevant to the planning application**

I wish to raise our concern that this important information on vehicular movements and other road usage was not published on the NHC planning portal until 15 September 2026. This information was relevant to assessment of the suitability of the proposed construction route and should, therefore, have been made publicly available before the decision to grant planning approval was made.

**Outstanding information request**

In my letter of 5 August 2026, I requested that full details of correspondence between NHC and HCC Highways in the run up to PACE submitting a revised 73 application be made available via the NHC planning portal. I would be grateful if you could arrange for me to receive this information as a matter of urgency.

**Next steps**

We would be happy to discuss any points in our letter if that would be helpful.

**James Colegrave**  
**Chairman**  
**Bygrave Parish Council**

## **Additional comments by Bygrave Parish Council on the Section 73 Application by PACE to amend Planning Condition 26**

### **1. Introduction**

Set out below are the comments of Bygrave Parish Council on the information added to the NHC planning portal on 15 September 2026. In light of the additional information, we have also made further comments on some of the documentation previously submitted by PACE to support its application.

The comments below are in addition to, and do not replace, comments previously made by Bygrave Parish Council on the Section 73 application.

### **2. ATC Survey – speeds and volumes**

In order to assess the suitability of the proposed construction route and necessary mitigations, a survey was undertaken of vehicle volumes and vehicle speeds along Bygrave Road and Ashwell Road. Ideally, such a survey would be undertaken when road conditions are typical for the area. If that were not the case, then appropriate adjustments would need to be made to the base data or, preferably, the survey repeated. Concerningly, road conditions were not typical when the survey was undertaken and no allowance was made for this in the report by PACE.

The traffic survey covered the 10-day period from 17 January 2023 to 26 January 2023. The weather locally during the first half of January 2023 was wet and mild with significant levels of rainfall. The second half of the month (from 15 January) saw a sustained cold snap with sub-zero temperatures, ice (on the wet roads), and freezing fog. Driving conditions, especially on country lanes, were treacherous. This would, undoubtedly, have resulted in lower observed traffic volumes and significantly lower traffic speeds than would otherwise be the case.

Consequently, it was unsafe to rely on the traffic survey results when determining suitability of the proposed construction route and necessary mitigations.

### **3. ATC Survey – turning count surveys**

Surveys were undertaken over a 12-hour period on 17 January 2023 at four spots where public rights of way intersect the construction route. According to the BBC, the local weather on this date "... featured a severe cold snap with sub-zero temperatures and icy conditions. The Met Office issued an overnight yellow weather warning for ice covering Hertfordshire and the surrounding East of England regions due to freezing temperatures acting on previously wet surfaces, leading to widespread frost and hazardous, icy patches."

Clearly, the number of cyclists, pedestrians and horse riders observed in the survey data would be significantly lower than might otherwise be expected. Using the raw survey data to assess the suitability of the proposed construction route and necessary mitigations, as PACE has done, is inappropriate and, indeed dangerous.

Consideration should also have been given to other seasonal impacts on non-vehicular usage of the construction route. For example, during the Spring and Summer months when the weather is typically milder and the days are longer, usage will be greater than at other times of the year.

### **4. Comparison of traffic results for the two surveys – January 2023 and November 2023**

We have compared the vehicle movements recorded for Channel 1 (by Cat Ditch) in January 2023 with that collected for the new proposed site entrance in November 2023. As there are no exits from the stretch of road between the two measurement points, the number of vehicle movements recorded would be expected to be very similar for the two surveys. However, the volumes observed in

November 2023 were substantially higher – a daily average of 738 vehicle movements compared with 552, ie some 34% higher. Was the reason for this difference investigated? If not, why not? We also note that the Bygrave Action Group expressed concerns that the observed traffic volumes in the November 2023 survey did not capture all vehicles.

## **5. Technical Note TN01**

### ***5.1 Current access to and egress from the site***

Paragraph 2.1.4 of TN01 implies that agricultural vehicles currently enter and exit the development site via the junction of the bridleway to the north of the site and Ashwell Road. This is incorrect. These vehicles normally enter from the landowner's farm to the west of the site.

### ***5.2 Construction vehicle sizes***

Paragraph 3.1.2 of TN01 states that "... the significant majority of construction vehicles are likely to up to 10 m rigid sided HGVs ... Only the substation components would require transportation by larger vehicles up to 16.5 m long articulated HGVs. This has been considered as part of the construction routing analysis." It is now, however, the intention of PACE to also transport the solar panels and fencing using 16.5 m long articulated HGVs. It is unacceptable for PACE to make such fundamental changes to their transport plans after being granted planning approval and then seeking an amendment to a planning condition to accommodate this.

### ***5.3 Road width assessment***

TN01 makes numerous references to passing places, lay-bys and road widenings along Bygrave Road and Ashwell Road. No such facilities exist. In some locations, vehicles have encroached onto and damaged the verges, but these areas cannot properly be regarded as passing places or additional road width. Such encroachment should be prevented and the damaged verges repaired, not used to justify the suitability of these roads for construction traffic..

### ***5.4 Booking system***

It is stated that a booking system, communication between drivers and marshals, and holding bays will be used to ensure that no (construction) vehicles will pass on Ashwell Road. The Construction Traffic Management Plan needs to be amended to incorporate this commitment.

## **6. Technical Note TN06**

### ***6.1 Proposed increase in articulated lorry activity***

Having now received the 2023 ATC survey data, we are in a position to comment on the impact of the proposed increase in articulated lorry activity as covered on pages 6 and 7 of TN06. The current wording in TN06 is misleading and vastly understates the impact these additional articulated HGVs would have on the road network.

The approach taken by PACE to assess the impact was to compare the proposed number of articulated vehicle movements arising from the construction work with the current number of **HGV** movements. The correct approach would have been to compare the proposed number of articulated vehicle movements arising from the construction work with the current number of **articulated vehicle** movements.

The observed number of movements of OGV2 vehicles (large HGVs which includes but is not limited to articulated vehicles) in PACE's survey was a daily average of 13. We understand that on UK country lanes, the proportion of OGV2 vehicles that are articulated is very low – typically 15%-25%. In the absence of any information to the contrary, it would be reasonable to assume that of the 13

OGV2 vehicle movements, just two or three would have been articulated vehicles. This is consistent with the statement by HCC Highways when expressing security concerns about the use of articulated lorries on the construction route that "... many of its users would not be expecting vehicles of this size to approach."

The current planning condition permits a maximum of two articulated lorry visits each day, ie four movements. This would result in an increase in such vehicles (based on the PACE survey) of 50%-100%. The proposal by PACE to permit six daily movements by articulated vehicles and eight in specified circumstances would result in at least a doubling of articulated vehicle movements with potential for a quadrupling. This should not be permitted.

## **7. Response to Bygrave Action Group**

### ***7.1 Banksperson at the junction of the A507 and Bygrave Road***

It is stated that PACE committed to a banksperson being located at the junction of the A507 and Bygrave Road to manage all construction movements and to ensure pedestrians can be accommodated safely at this location to minimise conflicts. This commitment was in addition to making the temporary changes to the junction.

The Construction Traffic Management Plan needs to be amended to incorporate this commitment.