

**Consultation Response from KC,
Trees**
2021/93644 Low Farm, Wakefield Road, Flockton, Huddersfield, WF4 4BB
Erection and operation of grid-connected solar photovoltaic farm, with ancillary infrastructure and landscaping and biodiversity enhancements
Date Responded: 05/11/21
**Responding Officer: Nick
Goddard**
Responding Ref: TPO KB1/49

The site spans across many fields and includes on or adjacent to it many woodlands and rows of trees which provide the character of the area. The conflicts identified below are only those where the trees or woodlands affected are valuable. It is noted that much of the development incorporates the existing tree cover and habitats and has sought to include buffer planting around the major woodlands.

The northern part of the site bounds Grange Wood, Denby Wood and Harry Royd Clough Wood, which are designated ancient woodlands. There is therefore an expectation and requirement under the NPPF to leave a sufficient buffer, deemed to be 15m by Natural England, between them and any development. At present it does not appear that 15m buffer areas have been achieved.

Site Access and Compound

The site's access from Wakefield Road is to use an existing gateway that leads to a track that runs down the centre of a woodland, comprising of an avenue of mature trees with established woodland on either side. The proposed access would then turn off right to the compound or left to the adjacent field at the western end of the site.

The access does not appear to have utilised an existing gap to reach the compound and the proposals would therefore impact on this protected woodland. This would be clearer had an AIA been submitted with the proposals. There is some potential for the access to be made through the woodland but it should be designed in such a way to avoid unnecessary removal or harm to the main components of the woodland.

The access to the western field is similar but then also heads north along the outer edge of the woodland instead of being positioned far enough out into the field as to avoid impacts to the adjacent trees.

The compound location and details of its layout have been provided and would conflict severely with the adjacent trees along Wakefield Road. The mature trees along Wakefield Road could be avoided by moving the compound further into the site, again this would have been clearer had an AIA been submitted with the proposals.

Access Track

The access tracks around the site are to be constructed to a specification of approximately 4m wide and 0.5m deep according to the Internal Access Track Cross Section drawing. The majority of tree roots exist in the top 0.6m of soil so excavation as proposed will be harmful where it is in close proximity to trees. In much of the site where the track crosses existing fields this proposal causes no issues with the existing tree stock, however in places this construction will result in conflict with trees which has been summarised below.

Access around area 3 follows the line of the existing farm track. The existing track is little more than compacted ground in places and therefore the excavation for the proposed track would result in significant damage to trees adjacent to it. The best solution is to incorporate the woodland planting around the outside of the existing woodlands and to position the new track outside that meaning harm to rooting areas are likely to be minimal. Alternatively, a tree friendly construction of track would be required as it passes around the existing trees and woodlands.

This only seems to conflict with the solar panel locations to the west of the central woodland between area 2 and 3. The land immediately west of the woodland would be shaded in the mornings and the plans do not appear to show many panels positioned at the edge. It is hoped that an alteration to the track location can be made to avoid the need for the existing track to be 'upgraded' resulting in 0.5m excavation for 4m width adjacent to the woodlands.

Access between area 2 and 7 passes between two woodland blocks; there is no alternative position in this location. In this location an alternative solution would need to be used to prevent excavation or compaction.

Access between area 7 and 8 does not use an existing gap in canopy cover but passes through a spur from the ancient woodland, Harry Royd Clough Wood. The existing gap in this boundary line should be utilised to avoid impacting on the woodland.

Access to area 4 from Wakefield Road is positioned close to a significant tree and does not utilise an existing gap further west. This could result in damage to the tree's roots, leading to decline and early decline. It is hoped that existing gaps in tree cover could be utilised to avoid such impacts.

Access to area 5 from Grange Lane will require the removal of at least one tree however the tree was of poor quality and should not be a constraint on the proposals.

Summary

At present there are some key areas that require alteration and or specific design measures to avoid causing harm to valuable trees and woodlands. For these reasons the proposals do not currently meet policies LP24 and LP33 of the Kirklees Local Plan.

the application will require an Arboricultural Impact Assessment fully assess the impacts of the proposals. It is will also be necessary for an Arboricultural Method Statement to be produced to detail tree protection measures required to ensure where construction traffic will be focused it will not cause harm to retained trees.