

# South Brooks Solar Farm

## Preliminary Environmental Information

Volume 2: Environmental Summary

Chapter 10: Transport and Access

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Blue Planet Solar Limited



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## 10 Transport and Access

### 10.1 What is 'Transport and Access'

- 10.1.1 Transport and Access refers to the movement of vehicles, associated primarily with the construction materials and staff associated with the construction phase of the Project, and the capacity of the existing infrastructure to accommodate changes in traffic volume and flow.
- 10.1.2 The transport network in the Romney Marsh area is characterised by a network of rural A and B roads, notably the A259, which serves as a primary strategic link between coastal settlements. This network currently supports a mix of local residential, agricultural, commercial and recreational traffic. Many of the secondary roads serving the Site are narrow in nature, often bordered by the drainage ditches (sewers) characteristic of the Romney Marsh, which presents specific constraints for Heavy Goods Vehicles (HGVs) and specialised Abnormal Indivisible Loads (AIL) required for transformer deliveries.
- 10.1.3 Potential Impacts and sensitivities would include increased traffic volumes that can lead to temporary effects on severance, pedestrian delay, and amenity, particularly within nearby villages and hamlets. The assessment would focus on "Sensitive Receptors," which include residents, road users and vulnerable groups.
- 10.1.4 The assessment has considered the access requirements and would focus temporary construction traffic on the A and B class road network, avoiding HGV traffic passing through settlements such as Lydd, New Romney and Camber.
- 10.1.5 Consideration of users of Public Rights of Way (PRoW) has been undertaken. The extensive network of footpaths and bridleways across the Romney Marsh at certain locations would interact with the Project and there may need to be short duration, temporarily diversions during the construction phase to ensure safety for path users.
- 10.1.6 The preliminary assessment has been conducted in accordance with national guidelines, comparing the "Baseline" traffic flows against the "With Development" scenarios. The peak of construction activities has been estimated, based upon the initial Project masterplan. Full details of the traffic generation and assignment to the local road network is provided in the accompanying Transport Assessment report.
- 10.1.7 An outline Construction Traffic Management Plan (oCTMP) has been prepared to mitigate against any issues that may arise with the temporary increase in traffic flows associated with the Project during construction. The CTMP ensures the continued safety and efficiency of the Study Area road network for all users.

**Appendix 10.1- Transport Assessment** assesses transport impacts during decommissioning.

10.1.8 Operational and decommissioning effects would be less than those associated with construction. The Decommissioning phase would have daily traffic levels fixed as part of a Decommissioning Traffic Management Plan, secured through the DCO.

## 10.2 Key Terms

**Table 10-1: Key Terms**

Term	Definition
Annual Average Daily Traffic (AADT)	A measurement of the average number of vehicles on a road over a year.
Abnormal Indivisible Load (AIL)	Abnormal loads that cannot be divided into two or more loads to be transported by road and are in excess of the limits set out in the Road Vehicles (Construction and Use) Regulations 1986.
Construction Traffic Management Plan (CTMP)	A document that sets out measures on how construction traffic, including Site personnel movements, would be safely controlled during a construction period.
Department for Transport (DfT)	The UK Government department responsible for transport matters.
Design Manual for Roads and Bridges (DMRB)	A set of documents and design guidelines that contains information about current design standards relating to the design, assessment and operation of roads within the UK.
Heavy Goods Vehicle (HGV)	A vehicle that is used to transport goods and materials and has a gross combination mass of more than 3,500 kg.
Light Goods Vehicle (LGV)	A vehicle that is used to transport goods and materials and has a gross combination mass of less than 3,500 kg.

Term	Definition
National Cycle Network (NCN)	A UK-wide network of signed paths and routes for walking, wheeling, cycling and exploring outdoors.
National Road Traffic Forecast (NRTF)	Forecasts produced by the DfT to predict further traffic growth.

### 10.3 Summary of Points Raised in EIA Scoping Opinion and Project Response

10.3.1 Comments provided by the Planning Inspectorate (PINS) relating to areas to be considered (scoped in) to the Transport and Access review are summarised in Table 10-2.

**Table 10-2: PINS Scoping Opinion on Transport and Access**

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
Due to low level of traffic movements, the operational phase can be scoped out of the assessment.	Noted. The operational phase has been scoped out of the assessment, although in line with good practice, the operational traffic volumes are noted for comparison purposes.	Resolved.
Further detail of the decommissioning traffic levels should be provided to justify the removal of this traffic effect from the assessment.	Further information on traffic generation has been provided illustrating that this phase can be scoped out as standard with this type of development. It is not possible to accurately estimate baseline traffic flows over 60 years in the future and as such, the provision of a Decommissioning Traffic Management Plan (DTMP) is considered to be the most effective method of securing appropriate traffic management measures that suit the network at that time.	Further details on decommissioning traffic levels would be presented as part of the transport and access chapter of the ES to be submitted as part of the DCO application.
Road improvement works external to site are included in the DCO application. If these are third party	To date no external Site improvement works have been identified outside the proposed DCO extents.	Information to be provided at the DCO

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
measures, please advise how should they be considered and assessed.	No third party works have been identified that would benefit the Project.	submission stage.
Any AIL convoy plan should include details of road closures and associated diversions. The impacts of these should be reported.	No road closures or diversions are anticipated with the movement of the proposed AIL to date.	At the DCO submission stage.
The traffic movements should be stated in vehicle classes. Vehicle access routes should be provided.	The Transport Assessment ( <b>Appendix 10.1</b> ) already provides this level of information.	At PEI submission.
A Transport Assessment should be prepared and consulted on with the relevant authorities.	A Transport Assessment ( <b>Appendix 10.1</b> ) has been prepared for PEI and engagement with the relevant authorities would be undertaken.	At the DCO submission stage.
The ES should identify any weight or width restrictions and how these influence likely significant effects.	To date, the access strategy avoids the use of roads with posted weight restrictions. One road, Dengemmarsh Road may be used to access environmental improvements, however this is yet to be confirmed at this PEI stage and access may be restricted solely to minimal LGV access only.	At the DCO submission stage.
Consideration should be given to impacts the Project may have on river vessel access.	The Project does not affect any navigable watercourses.	Resolved.

10.3.2 In addition to the PINS Scoping Opinion, engagement has been and continues to be undertaken with relevant stakeholders. A summary of ongoing consultation with statutory consultees in relation to transport and access is provided in Table 10-3.

**Table 10-3: Summary of Ongoing Comments and Feedback with Consultees**

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
Introduction to the Project and discussion on likely access routes.	ESCC Highways	No specific feedback, but would commit to consult further.	Commitment to engage further as the Project develops.
Concerns expressed about traffic impacts during construction phase.	Members of the public	The traffic impacts would be fully detailed in a Transport Assessment (TA) and appropriate mitigation would be identified in a Construction Traffic Management Plan (CTMP).	Confirm the traffic impacts and update the CTMP for final submission.
Concerns expressed about the ability to develop South Books E, given access constraints.	Members of the public	No solar development is now proposed on South Books E, with access required only for environmental enhancements, requiring substantially less traffic.	Confirm traffic requirements for South Books E.
Concerns about accessing South Brooks D.	Members of the public	No access on the existing unadopted road lying parallel to the railway is proposed. Access to South Brooks D would be via Lydd Airport Link Road.	No further actions.

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
Concerns about disruption and diversions of PRow network.	Members of the public	Any disruption to PRow routes would be temporary in nature and respectfully managed through an outline Rights of Way Access Strategy (oRoWAS).	Draft and complete the oRoWAS.

10.3.3 **Appendix 1-2: Key Policy and Legislation** provides details on the legislation, policy and guidance that has informed the approach to the transport and access assessment.

## 10.4 Ongoing Transport and Access Work Study Area

10.4.1 The development of the access strategy has allowed the development of the study area, namely:

- A2070 between Ashford and the A259 junction;
- A250 between Rye and New Romney;
- B2075 between its junction with the A259 and Lydd;
- Jury’s Gap Road between Camber and Lydd;
- Tourney Road, Lydd;
- Harden Road, and Robin Hood Lane, Lydd;
- Dengemarsh Road, Lydd; and
- Lydd Airport Access Link.

10.4.2 Effects associated with construction traffic generated by the Project would be most pronounced in close proximity to the Site and on the final approaches to the Site. As vehicles travel away from the Project, they would disperse across the wider road

network, thus diluting any potential effects. It is therefore expected that the effects relating to construction traffic are unlikely to be significant beyond the Study Area identified above. The Study Area is illustrated in **Figure 10-1: Transport and Access Study Area**.

### **Access Strategy**

- 10.4.3 A detailed review of access to the Project land parcels has been undertaken and is described in detail in the Transport Assessment (see **Appendix 10.1: Transport Assessment**). The access strategy has been developed to ensure that access is available via appropriate roads, that are not constrained by weight or width restrictions and routes that would avoid HGV traffic passing through villages such as Lydd, Camber and New Romney. This strategy would be policed by the outline Construction Traffic Management Plan (oCTMP) to protect sensitive receptors.

### **Collection of Transport and Access Data**

- 10.4.4 A range of baseline data necessary for the assessment of likely traffic effects has been undertaken. These include:
- Site visits to understand the Site access constraints and identify safe and efficient means of access to the Project;
  - Details of the PRoW and Cycle way network of the Study Area;
  - Collection of road accident data within the study area for a five year period to review accident trends and issues;
  - Collection of Department for Transport (DfT) traffic count data for the A2070 and A259;
  - Automatic Traffic Count (ATC) surveys took place in late February 2026 for a period of one week, on roads across the study area; and
  - Consideration of potential Abnormal Indivisible Load (AIL) access routes to enable the delivery of transformer loads.
- 10.4.5 The baseline traffic data has been estimated using National Road Traffic Forecasts (NRTF) factors to provide future year baseline data for the expected peak year of construction traffic in 2029.

### **Traffic Generation and Assignment**

- 10.4.6 Using the masterplan design prepared for the Phase Two Consultation, material estimates have been prepared to estimate the likely traffic generation associated with the construction phase. This has identified that the peak of construction traffic

would occur in Month 7 (of an assumed 24-month programme), where 472 daily movements (230 Car & LGV and 242 HGV trips) are estimated.

10.4.7 These construction trips have been distributed and assigned to the study area network to estimate the likely traffic flows. These are summarised in Table 10-4.

**Table 10-4: Peak Month Daily Construction Traffic Flows (Two Way Flows)**

Ref	Link	Cars & LGV	HGV	Total
1	A2070 South of Ashford	138	231	369
2	A259 at Brookland	196	128	323
3	A259 at South Brooks A	230	128	358
4	A259 Southeast of Old Romney	58	103	161
5	A259 in New Romney	35	0	35
6	B2075 South of Hammonds Corner	23	71	94
7	B2075 at Prospect Petty Sewer	23	71	94
8	Lydd Airport Link Road	0	0	0
9	Harden Road, Lydd	23	0	23
10	Robin Hood Lane, Lydd	23	0	23
11	Tourney Road, Lydd	23	0	23
12	Jury's Gap Road, west of Lydd	23	0	23
13	Dengemarsh Road	0	0	0

## 10.5 Important Receptors Identified

10.5.1 Sensitive receptors would include road users (regardless of mode of travel) and those living along the routes that would be used for the transport of staff and materials to and from site.

10.5.2 The Transport Assessment has already considered the receptors at highest risk of significant effects and these are considered to be the following:

- Users of the A2070;
- Residents in the southernmost section of Ashford;

- Users of the A259;
- Residents of Old Romney; and
- Users of the B2075.

10.5.3 Users of Public Rights of Way (PRoW) within the construction areas of the Project are considered important receptors as they would encounter construction traffic during the Project construction phase, where no such traffic existed before.

## **10.6 Considering Transport in Design**

10.6.1 Transport considerations have influenced the location and form of the Site access junctions and these are incorporated into the Project masterplan.

10.6.2 Outside of the physical design, the oCTMP has been developed to ensure that the Site would operate as intended with respect to transport safety and efficiency for all road users.

## **10.7 Preliminary Assessment of Likely Significant Effects**

### **Approach**

10.7.1 Recent guidance published by the Institute of Environmental Management and Assessment (IEMA), now known as the Institute of Sustainable and Environmental Professionals (ISEP), namely 'Environmental Assessment of Traffic and Movement' (2023) (the 'ISEP Guidelines') have been used to characterise the environmental traffic and transport effects (off-site effects) and the assessment of significance of major new developments. The guidelines intend to complement professional judgement and the experience of competent experts.

10.7.2 In terms of transport impacts, the receptors are the users of the roads within the Study Area and the locations through which those roads pass.

10.7.3 The ISEP Guidelines include guidance on how the sensitivity of receptors should be assessed. Using that as a base, professional judgement was used to develop a classification of sensitivity for users based on the characteristics of roads and locations.

10.7.4 The magnitude of impact has been assessed in accordance with the following rules which are outlined in the ISEP Guidelines, and are used to inform a screening exercise to determine which links within the study area are to be considered for detailed analysis in the assessment:

- Rule 1: Include highway links where traffic flows are predicted to increase by more than 30% (or where the number of HGVs is predicted to increase by more than 30%); or
- Rule 2: Include any other specifically sensitive areas where total traffic flows are predicted to increase by 10% or more.

### Preliminary Assessment

10.7.5 Initial screening has been undertaken using these rules at this initial assessment stage.

10.7.6 The peak month construction traffic data has been combined with the future year (2029) traffic data to allow a comparison between the baseline results to be made. The increase in traffic volumes is illustrated in percentage increases for each class of vehicle. This is illustrated in Table 10-5.

**Table 10-5: Percentage Impact Summary**

Ref	Link	Cars & LGV	HGV	Total
1	A2070 South of Ashford	0.9%	36.8%	2.2%
2	A259 at Brookland	3.2%	37.1%	4.9%
3	A259 at South Brooks A	4.5%	11.9%	5.7%
4	A259 Southeast of Old Romney	0.5%	34.9%	1.4%
5	A259 in New Romney	0.3%	0.0%	0.3%
6	B2075 South of Hammonds Corner	0.3%	78.9%	1.2%
7	B2075 at Prospect Petty Sewer	0.3%	87.1%	1.3%
8	Lydd Airport Link Road	0.0%	0.0%	0.0%
9	Harden Road, Lydd	0.6%	0.0%	0.5%
10	Robin Hood Lane, Lydd	1.1%	0.0%	1.1%
11	Tourney Road, Lydd	1.5%	0.0%	1.5%
12	Jury's Gap Road, west of Lydd	1.4%	0.0%	1.4%
13	Dengemarsh Road	0.0%	0.0%	0.0%

Please note minor variances due to rounding may occur.

- 10.7.7 The assessment indicates that no road links within the study area would exceed the 10% or 30% total traffic impact criteria set out in the ISEP Guidance. HGV traffic however does exceed the 30% threshold on the A2070 South of Ashford, A259 at Brookland, A259 to the south of Old Romney and on the B2075. A detailed assessment of these effects would be required.
- 10.7.8 The impact on PRow users would be considered. Given that no construction traffic currently operates on or in close proximity of PRow within the Project boundaries, the likely impact on these users would be greater than 100% and as such, would be of significance.
- 10.7.9 A summary of the potential likely significant effects at this stage of the Project is presented in Table 10-6.

**Table 10-6: Potential Likely Significant Transport and Access Effects**

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
Construction	Construction Traffic	Users of the A2070	Potential effects may include changes in non-motorised user amenity, fear and intimidation and large load associated effects, prior to the application of appropriate mitigation measures.	With the provision of a detailed oCTMP, including ALL management measures, the likely effects are expected to be not significant.	The traffic impacts would be confirmed for the finalised masterplan and the impact reconsidered. The draft oCTMP would be further enhanced, if required.
		Residents in Ashford	Potential effects may include changes in severance, pedestrian delay, non-motorised user amenity, fear and intimidation and large load associated effects, prior to the application of appropriate mitigation measures.	With the provision of a detailed oCTMP, including ALL management measures, the likely effects are expected to be not significant.	The traffic impacts would be confirmed for the finalised masterplan and the impact reconsidered. The draft oCTMP would be further enhanced, if required.
		Users of the A259	Potential effects may include changes in non-motorised user amenity, fear and intimidation and	With the provision of a detailed oCTMP, including ALL management measures, the likely effects	The traffic impacts would be confirmed for the finalised

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
			large load associated effects, prior to the application of appropriate mitigation measures.	are expected to be not significant.	masterplan and the impact reconsidered. The draft oCTMP would be further enhanced, if required.
		Residents of Old Romney	Potential effects may include changes in severance, pedestrian delay, non-motorised user amenity, fear and intimidation and large load associated effects, prior to the application of appropriate mitigation measures.	With the provision of a detailed oCTMP, including AIL management measures, the likely effects are expected to be not significant.	The traffic impacts would be confirmed for the finalised masterplan and the impact reconsidered. The draft oCTMP would be further enhanced, if required.
		Users of the B2075	Potential effects may include changes in severance, pedestrian delay, non-motorised user amenity and fear and intimidation associated effects, prior to the application of appropriate mitigation measures.	With the provision of a detailed oCTMP, the likely effects are expected to be not significant.	The traffic impacts would be confirmed for the finalised masterplan and the impact reconsidered. The draft oCTMP would be further enhanced, if required.

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
		PRoW Users	Potential effects may include changes in severance, pedestrian delay, non-motorised user amenity, fear and intimidation and large load associated effects, prior to the application of appropriate mitigation measures.	With the provision of a detailed oCTMP and outline Rights of Way Access Strategy (oRoWAS), the likely effects are expected to be not significant.	The traffic impacts would be confirmed for the finalised masterplan and the impact reconsidered. The draft oCTMP would be further enhanced, if required. The oRoWAS would be drafted and developed to reduce impacts wherever possible.

**Drawing number**

Figure 10-1

**Project/Location**

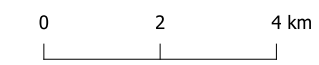
South Brooks Solar Farm

**Drawing title**

Transport and Access Study Area

**Legend**

 Roads



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



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