National Highways Planning Response (NHPR 22-12)
Formal Recommendation to an Application for Planning Permission

From: Regional Director, South West Operations Division, National Highways
planningsw@nationalhighways.co.uk

To: Wiltshire Council
FAO Georgina Wright

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: PL/2023/06905

Location: Land adjacent to the Sewage Works, Petersfinger Farm, Salisbury

Proposal: Solar farm, access track, cabling, landscaping improvements and associated infrastructure works

National Highways Reference: NH/23/02573

Referring to the consultation on a planning application referenced above, in the vicinity of the A36 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

~~a) offer no objection (see reasons at Annex A);~~

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions and reasons);

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex).~~

Highways Act Section 175B is not relevant to this application.[1]

[1] Where relevant, further information will be provided within Annex A.

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningsw@nationalhighways.co.uk

Signature: G Gallacher **Date:** 12 September 2023

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Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "*The Strategic Road Network and the Delivery of Sustainable Development*" and the National Planning Policy Framework (NPPF. This response represents our formal recommendations with regards to planning application reference PL/2023/06905.

Reasons

The application is seeking permission in full for a solar array with associated access, landscaping and infrastructure on an agricultural site located south-west of Petersfinger Farm.

We understand that the application site is currently in the same ownership as Petersfinger Farm which is currently subject to a planning application for development as an assisted living/retirement community (application reference 20/1200/FUL). The intention appears to be for the landowner to transfer around 40 acres of land, including the proposed solar farm development site, to the Wiltshire Wildlife Trust (WWT) following the award of planning permission at Petersfinger Farm. The application site will then be leased from the WWT for the community-owned renewable energy solar farm project. However, the applicant states that the solar farm development is not reliant on the approval of application 20/01200/FUL.

National Highways is the strategic highway authority with responsibility for operating, maintaining and improving the strategic road network which in this case comprises the A36 Southampton Road. It is in the context of these responsibilities that our comments are made. It is accepted that the traffic impact of the development once in operation will be minimal, but there is the potential for the development to generate significant vehicle movements during the construction and decommissioning phases.

The site will be served by the existing direct access from the A36 Southampton Road which currently serves Petersfinger Farm and adjacent agricultural land, including the application site. The A36 is known to experience congestion particularly during the network peak hours and whilst it is acknowledged that previous extant uses on the site could have generated uncontrolled agricultural vehicle movements, we consider it will nonetheless be necessary for National Highways to understand how construction traffic will be managed to minimise any adverse impacts on the SRN. This will be particularly important if development proposals at Petersfinger Farm are also consented, as there will then be the potential for vehicle movements associated with the construction of the solar farm to take place alongside vehicle movements

associated with the construction of the retirement community and works to alter the existing access arrangement.

Although the application is supported by an outline Construction Environment Management Plan, National Highways will require the submission of a detailed Construction Traffic Management Plan (CTMP) for our review and acceptance prior to the commencement of the development. The applicant has acknowledged their willingness for this to be secured by a suitable planning condition.

The CTMP will need to demonstrate that safe and suitable access to the development will be provided, giving consideration to any works that may come forward on the wider Petersfinger Farm site. The plan should include details of the number, type, frequency and duration of vehicle movements, vehicle routing, measures to minimise vehicle conflicts given the access route within the site presents constraints which restrict two-way vehicle movements, and vehicle swept path plans to demonstrate that the largest vehicle to be utilised can be safely accommodated. The plan will need to demonstrate that all off-loading/loading and storage of plant and materials can be accommodated on site as well as the provision of space for the parking of contractors vehicles. We would also expect the applicant to consider measures to avoid construction deliveries during A36 weekday peak hours.

In terms of any other potential impacts on the SRN, we consider that given the location of the site relative to the A36, the orientation of the panels and intervening vegetation, the development is unlikely to result in an unacceptable visual impact on trunk road traffic or otherwise adversely impact on the SRN asset.

Recommendation

National Highways recommends that a condition should be applied to any permission Wiltshire Council is minded to grant in respect of planning application reference PL/2023/06905 to the effect that:

> Prior to the commencement of the development hereby permitted a construction traffic management plan shall be submitted to and approved in writing by the local planning authority (in consultation with the strategic highway authority). The plan shall include as a minimum: construction vehicle movements, access routes for construction vehicles, construction operation hours, construction delivery hours, expected number and type of construction vehicles per day, car parking for contractors, wheel washing facilities, and arrangements for on-site off-loading and storage of construction plant and materials. Construction shall be carried out in accordance with the approved plan for the duration of works.
>
> Reason: to mitigate any adverse impact of the development on the A36 trunk road in accordance with DfT Circular 01/2022.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon