



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Head of Planning & Development, Operations Directorate, SWRegion,
National Highways
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To: Wiltshire Council (FAO Oliver Phippen)
developmentmanagement@wiltshire.gov.uk

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

Council's Reference: PL/2025/05830

Location: Land at Flaxlands Farm, Royal Wootton Bassett, Swindon, SN4 8DY

Proposal: The construction and operation (including maintenance) of a 49.9MW solar farm to include ground mounted solar photovoltaic (PV) arrays, electrical substations, grid balancing infrastructure, cabling, BESS (49.9MW capacity), communications tower, other associated infrastructure and areas for biodiversity net gain (BNG) enhancement and landscape mitigation

National Highways Ref: NH/25/12179

Referring to the consultation on a planning application referenced above, in the vicinity of the M4 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 & 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 A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

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 propose not 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.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: *G Gallacher*

Date: 06 August 2025

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Position: Assistant Spatial Planner

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

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a 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/2025/05830.

Reasons

The application is seeking permission for a 49.9 mw solar farm located on land to the north of the M4 and Royal Wootton Bassett, with associated works. National Highways primary interest in the development is the potential impact on the safe and efficient operation of the SRN, which in this case comprises the M4 motorway and associated junction 16. It is in this context that our comments are made.

Assessment of traffic impacts

National Highways considers that, once operational, the development is unlikely to generate significant vehicle movements, with the main traffic impact occurring during the construction phase of the development. The application is therefore supported by a Framework Construction Traffic Management Plan, prepared by AECOM and dated May 2025. This predicts a worst case trip generation of 14 two-way HGV movements per day, and 80 two-way daily movements of other vehicles, over a 6 month construction period. The plan also advises that deliveries will be scheduled to occur outside of network peak hours. All HGV movements will route via M4 J16, with other vehicles potentially dispersing across the highway network. On this basis, we therefore consider that the predicted construction traffic is unlikely to result in an unacceptable or severe impact on M4 J16.

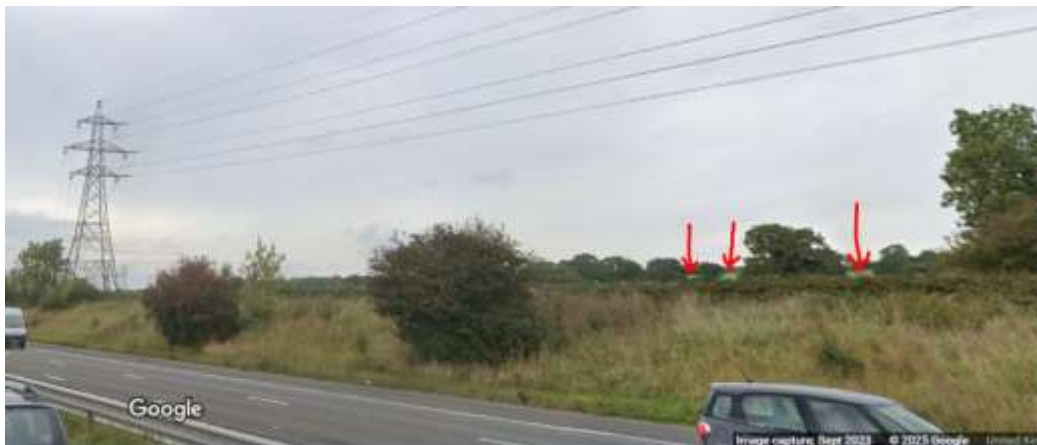
As previously stated, all HGV movements will route to the site via M4 J16. They will then utilise one of 2 potential onward route options to the site. Route Option 2 (the applicant's preferred route) will utilise an overbridge of the M4 which already accommodates large vehicle movements, and Route Option 1 via the B4042 will utilise an M4 underpass which will present height restrictions. We will expect the applicant to make all necessary checks to ensure the chosen routes are appropriate to accommodate the size and type of HGV deliveries, and that any abnormal loads go through the required ESDAL process.

Assessment of operational impacts

Given the proximity and orientation of the panels in relation to the M4, it is important to ensure that the development will not result in glint or glare that could create a distraction to road users which would be considered an unacceptable highway safety risk.

We note from the Glint and Glare Cover Letter that there have been changes to the red line boundary and in the 'Final Concept Design' there has been a reduction in extent of fields proposed with solar panels. The Glint and Glare Study (Part 1) in para 4.3.2 advises that approximately 2.96km of the M4 has potential views of the panel area. Section 5.2 of the study presents the 'Assessment Results - Road Receptors' and on the whole we would accept the conclusion that *"Existing vegetation, buildings and/or terrain [are] predicted to significantly obstruct views of reflecting panels such that views are not possible in practice."*

However, in our view there is a 200m stretch of the M4 where there could be a risk of distraction to road users, notably for westbound traffic. We have provided Google Street View images below, in order of travel westbound, which show the fields where the solar panels are proposed to be visible from the motorway.





These images extend from approx. MP (Marker Post) 135/9 to 136/1, as shown on an extract below from our internal data mapping which also confirms that the highways soft estate along this stretch comprises a narrow strip of 'Open Grassland'. Visibility is apparent to the field hatched in blue, where solar panels are proposed. As a reference point, the red X marks the position of the mobile phone mast which is visible in each of the Google images above.



The length of M4 referred to above corresponds to receptor positions A22 and A21 in the Glint and Glare Study, as in snip below.



Whilst the solar reflections visible to road users may be transient, they may be sufficient to cause distraction. We therefore consider that the landscaping for the development should include some heavy standard trees along the southern boundaries of these two fields to infill any gaps in the existing vegetation, as highlighted in yellow below on a snip from Figure 11 'Outline Landscape Masterplan' presented in the Landscape and Visual Appraisal - Part 3. These should be planted in the first available planting season, should the planning authority be minded to approve the development, and provided with aftercare that supports early establishment and growth. We have therefore recommended a planning condition to this effect.



Summary

National Highways considers that the development is unlikely to result in an unacceptable or severe traffic impact on M4 J16, on the basis that construction traffic is managed in accordance with the submitted Framework Construction Traffic Management Plan.

However, it is considered that additional landscape planting will be required to the southern boundaries of the two south-eastern most fields where panels are to be installed, to mitigate any risk of glint or glare distraction adversely impacting on the safety of M4 motorway users, and a planning condition is recommended to this effect. We are however willing to consider any alternative form of wording that the planning authority may wish to propose that secures the same or greater protection for the SRN.

Recommendation

National Highways recommends that a planning condition should be applied to any permission Wiltshire Council is minded to grant in respect of application PL/2025/05830 to the effect that:

During the first planting season following the grant of planning permission, heavy standard trees shall be planted along the southern boundaries of the two solar panel fields located within the south-eastern extent of the development. The trees shall be provided with aftercare to support early establishment and growth in order to provide screening of the development for M4 motorway users. Any planting that fails shall be replaced within the next available planting season. The screening function of the planting shall be maintained as such for the duration of use.

Reason: in the interest of the safe and efficient operation of the M4 motorway, to mitigate an otherwise unacceptable impact on highway safety from glint/glare effects, 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 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.