



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

From: Andy Jinks (Regional Director)
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To: Rushcliffe Borough Council

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

Council's Reference: 24/00161/FUL

Location: Land West Of Bradmore Road and North Of Wysall Road Land

Proposal: Construction, operation and subsequent decommissioning of a renewable energy park comprising ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling.

National Highways Ref: 24/00161/FUL

Referring to the consultation on a planning application referenced above, in the vicinity of the **A52 and A46 trunk roads** that form 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

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 PlanningM@nationalhighways.co.uk.

Signature:

Date: 20 June 2024



Name: Catherine Townend

Position: Spatial Planner

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Annex A National Highway's assessment of the proposed development

This response represents our formal recommendations and has been prepared by Catherine Townend, Spatial Planner for National Highways.

National Highways (formally Highways England) 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.

National Highways considers planning applications for new developments under the requirements of the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular"). The latter document sets out our policy on sustainable development and our approach to proposals which may have an impact on our network.

The SRN in the vicinity of the proposed development is the A52 and A46 trunk roads.

Development Proposal

The proposed development consists of the construction, operation and subsequent decommissioning of a renewable energy park with an export capacity of up to 49.9MW of renewable energy per year. The Site would comprise ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling.

National Highways Comments

As we have received no further information from the applicant since our 20 March 2024 response, our previous comments are still appropriate. These have been set out again below.

As the Site does not share a common boundary with the SRN, we have assessed the proposal in relation to traffic impacts only.

Operational Traffic

As per the Transport Assessment (dated January 2024), during the operational phase, traffic movements are expected to be minimal. As such, our previous response of 29 February advised that National Highways had no comments to make about the traffic impacts for the operational phase of the development.

Construction Traffic

According to the Transport Assessment the construction period is anticipated to last for a period of 24 weeks for both parcels of land. HGV deliveries to Site are anticipated to equate to an average of 12 two-way HGV movements per day for the north parcel and 19 movements per day for the south parcel.

However, the Transport Assessment stated that for initial site set up (the first 2-3 weeks of construction) two-way HGV deliveries will be higher. We therefore asked for further details on this point. In that regard, we have since been consulted on a Technical Note (dated 4 March). This states that HGV movements would amount to a total of 284 two-way HGV movements across this initial set up period equating to 26 movements per day across the two parcels. National Highways has no further comments to make on this point.

Our previous response however also queries the light movement traffic and we asked for clarification on the vehicle trip generation for construction worker staff which would also need to be assessed. The above-mentioned Technical Note subsequently sets out that approximately 50 construction workers would be employed on site at any one time. The note goes on to say that *'at similar solar farm developments it has been observed that construction workers often travel together by mini-bus, travelling together from local accommodation'*.

National Highway is aware of this practice proposed for larger solar farm sites employing hundreds of construction workers, however, it should be explained why construction workers for this site would not be resourced from the local workforce. In addition, without further detail to explain how transporting staff would be implemented for this site, National Highways does not support this assumption.

Nonetheless, if the construction workers were taken from the local workforce, it is more likely that their travel to work movements would be distributed more widely across the highway network. As such, it is unlikely that traffic generation from both HGV deliveries and construction workers would result in more than 30 two-way trips during the peak hours at the nearest SRN junction, the threshold at which we generally require further assessment.

As such, based on the information presented, National Highways concludes that this proposal is unlikely to have a material impact on the SRN. However, the Construction Traffic Management Plan would need to be updated to reflect the true number of light vehicle trips (for construction workers arriving by private car), unless the applicant can provide further evidence to satisfy National Highways that staff trips will not exceed 15 two-way trips.

Summary & Recommendation

In summary, insufficient information has been submitted for National Highways to understand how the proposal will affect the Strategic Road Network.

We therefore **recommend that this application not be approved for a period of up to three months from the date of this letter**. This is to give that applicant time to address the matters set out in this letter.

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 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 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.