

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

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To: The Planning Inspectorate
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Planning Inspectorate Reference: S62A/22/0006

Uttlesford D. C. Reference: UTT/22/2046/PINS

Location: Land at Berden Hall Farm, Ginns Road, Berden.

Proposal: Development of a ground mounted solar farm with a generation capacity of up to 49.99MW, together with associated infrastructure and landscaping.

Application by: Berden Solar Limited; (the Applicant)

National Highways Ref: NH/23/03923

Referring to the consultation on a planning application dated 28 November 2023 referenced above, in the vicinity of the M11 and/or A120 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/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 PlanningEE@nationalhighways.co.uk

Signature: S. H.	Date: 18 December 2023
Name: Shamsul Hoque	Position: Assistant Spatial Planner
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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 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.

Recommended No Objection

National Highways offer no objection.

Reason:

The proposed Solar Farm's site access will be from the local road network. National Highway's interest lies in any impact on the safe operation of the Strategic Road Network. After receiving notification of this consultation letter dated 28 November 2023, I have completed our review of those revised documents and I have the following comments to make.

In general, during the operation of this solar farm, there is unlikely to be many regular vehicular trips to and from this site. The revised submission of the 'Construction Traffic Management Plan, Document Ref: Pelham Solar Limited CTMP – Rev 2' has mentioned a total estimated 350 number of HGVs trips, over the six months of

construction time. The initial three months will be a relatively intense construction period when there will be between 10 - 30 HGV lorries per day outwards movements. That means up to sixty lorries (HGV) trips maximum per day which will be distributed across the whole day. This revised CTMP (Rev 2) has also confirmed that articulated vehicle's over 16.5m in length delivery trip will not be used for any of the proposed solar farm photo-voltaic (PV) panels.

“For the majority of the construction works duration the number of outwards movements of construction vehicles in any one day will be between 10 and 30 HGVs. These movements will also most likely be during weekdays outside of peak times and not on Saturday or Sundays.” Source: Page 19 CTMP (Rev 2)

National Highways will welcome any initiative in the Construction Traffic Management Plan that all deliveries to the site will be managed to avoid the highways network during peak hours, especially, during the local school and nursery's pick and drop-off times. It may also be necessary to manage the construction traffic to avoid generating additional peak hour movements at specific sensitive junctions on the Strategic Road Network particularly M11 J8 it should be noted that the airport has an unusual peak of very early morning for staff and passenger arrivals.

The proposed construction travel routes (where the majority of construction traffic will come from the south) will use M11 Junction 8 and will be routed to the site via the A120 Junction with the B1383 (then via Michaels Rd and Hazelend Rd).

Previously submitted Glint and Glare Study report, dated January 2022, has presented technical details. Considering the size, angle, orientation and layout of those proposed solar panels, this Glint and Glare assessment demonstrates that there would be no severe impact to the road users of the Strategic Road Network. Therefore, no comment on the Glint and Glare Study.

With respect to the revised Environmental Statement documents as the majority of these are not directly related to the Strategic Road Network, therefore, National Highways does not have any comment on this.

Considering the amendments proposed to this planning application are not in conflict with National Highways (former, Highways England) previous formal responses recommending No Objection. Consequently, our previous recommendation of No Objection remains unchanged.

Please contact me at PlanningEE@nationalhighways.co.uk if you require any clarification on the above points.

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.