



Planning Services
Neath Port Talbot County Borough Council
The Quay
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

29th August 2023

Our Ref. SP22-1173

Dear Sir / Madam

Sun Fields, Dream Fields, Llandarcy, SA10 6JU
P2023/0356 - Proposed Ground Mounted Solar PV Array with a Generating Capacity of up to 1.3MW, including Development of Ancillary Structures, Landscaping and Ancillary Works

Simply Planning Ltd have prepared this response to the consultation representation provided by Neath Port Talbot County Borough Council's Head of Engineering & Transport in relation to planning application ref: P2023/0356 for the ground mounted solar PV array with a generating capacity of up to 1.3MW, including development of ancillary structures, fencing and landscaping works at Sun Fields, Dream Fields, Llandarcy.

The consultation response from NPT's Highways Team, dated 28th June 2023 (see **Document 1**), set out a number of concerns which are required to be addressed. Each concern is listed below, along with the applicant's response.

Response to Highways Consultation

A Transport Impact Assessment is required in accordance with TAN 18.

The applicant strongly refutes the need for a Transport Impact Assessment (TIA), given the nature of the application. The Highways consultee response opines that a TIA is required in accordance with Technical Advice Note 18: Transport (TAN 18). Energy generation is not a land use that is outlined within TAN 18, nor does the proposed development create any new gross floorspace. As such, the proposed scheme for a solar farm does not meet the threshold requirement for TIAs set out on page 50 of TAN 18.

The purpose of the thresholds set out within TAN 18 is that these are considered to be developments that "*are likely to result in significant trip generation*". Once the proposed scheme is operational, it will generate one visit per year, this for the maintenance works to be undertaken by a qualified professional. No additional movements will be generated as a result of the solar panels being washed (twice a year) or the maintenance of the land, as this will be undertaken by those already working on Dream Fields Farm. The existing farming operation which utilises this access will cease, therefore resulting in a net decrease in vehicle trips per year.

The generation of one trip per year cannot be considered to be '*significant trip generation*', especially when considering the offsetting of the loss of the existing farm traffic and therefore, there is no requirement for a TIA to be submitted.

Dependent on weather, the construction phase of development is estimated to take 15 days, with circa 200 solar panels installed per day. The solar panels and associated equipment will be temporarily stored at Hale Construction's factory on Milland Road Industrial Estate, before being transported by a long wheelbase van (10m

in length) to the site. The van is able to transport 3 pallets (which equates to 108 solar panels) and associated infrastructure per trip, therefore 2 trips will be required per day.

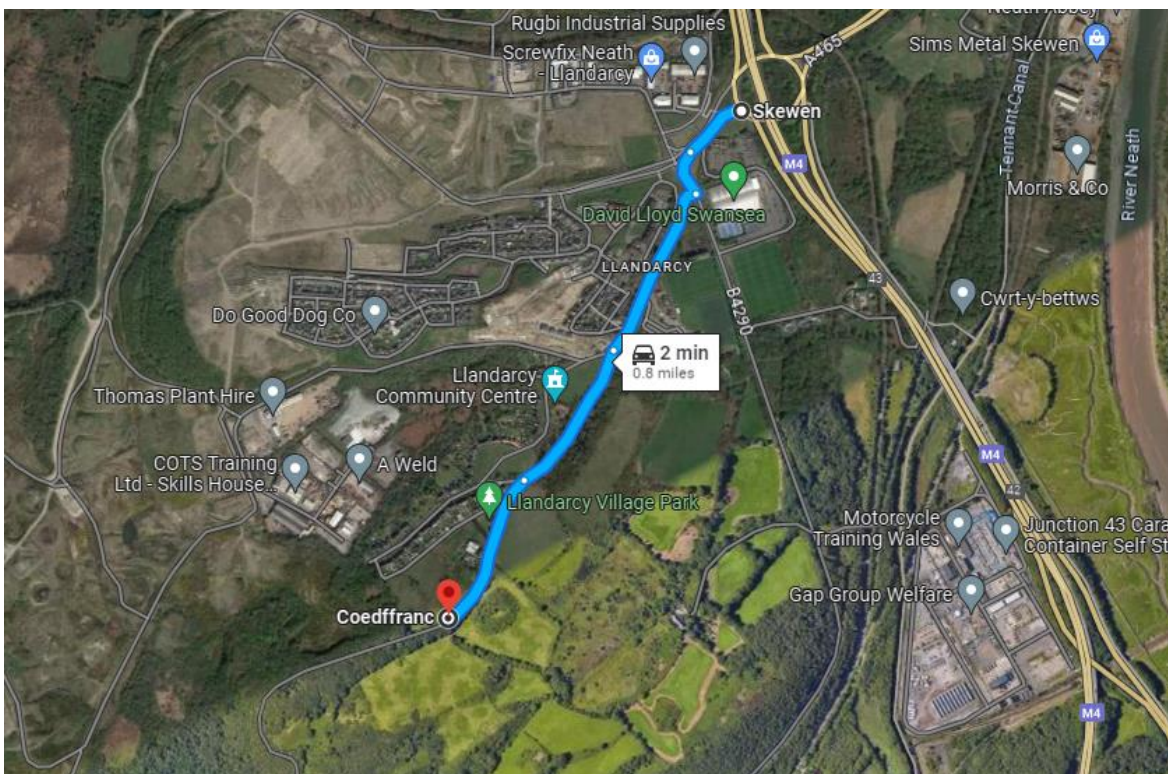
There will be 8 workers on site during the installation. These workers will arrive in 4 vehicles, which will only necessitate 1 trip per day each. Therefore, there will only be 6 two-way trips generated per day during the construction phase. This further emphasises that the scheme cannot be considered to have '*significant trip generation*' and therefore there is no requirement for a TIA to be submitted.

Whilst it is acknowledged that each application is to be judged on its own merit, it is worth noting that application reference P2020/0408 which granted planning permission for the installation and operation for a 2.23MW PV solar farm in Neath Port Talbot, did not require a TIA.

Application ref: 2020/0173/FUL was granted by Swansea Council on 5th June 2020, for the construction of a solar farm to include the installation of solar panels to generate up to 9.99MW of electricity at Carn Nicholas Farm. The Carn Nicholas Farm scheme is significantly greater in size than this proposed scheme at Sun Fields both in energy production and site area. The Carn Nicholas Farm Scheme was predicted to create 3-4 vehicle trips per year, which includes for the washing of the solar panels and maintenance of the land which would not require separate trips for the scheme at Sun Fields. Therefore, it is long established that solar farms generate very little operational traffic and there is no reason to suspect that this application should produce greater levels of traffic than any other solar farm scheme.

Scoping route for vehicles used in the delivery and future maintenance of the facility including details of the access point onto the nearest adoptable highway and the provision of suitable visibility splays in accordance with TAN 18.

The below map shows the route from a M4 to the site, with the route in blue.



The route shown involves vehicles which would exit the M4 onto the Llandarcy Interchange, then utilising the unnamed road to the site access. The road is sparsely used, with dwellings on 'The Greenway' more commonly accessed from Prettyman Drive. The road joins Llandarcy to Jersey Marine, however the B4290 serves the same function and so is much more commonly used for this route.

The road is not commonly used and it is rare to see another vehicle when traversing it. Therefore, utilising this route will not give rise to any traffic issues.

Details of any borrow pits proposed to facilitate construction of the scheme.

There will be no change in site levels as a result of the proposed scheme. Piling is to be utilised instead of borrow pits. Therefore, there are no details to be provided.

No development shall commence (including any site clearance), until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority.

The applicant is willing to accept a suitably worded condition which requires a Construction Environmental Management Plan to be submitted prior to the commencement of any development.

Proposed delivery route on NPTCBC adopted highway network may be subjected to a condition survey before commencement of any heavy good deliveries to and from the site this includes items such as culverts. These surveys may be competed annually throughout the life of the planning consent and any defects/damage to the existing highway resulting in frequent use of HGV's will be remediated by the applicant or a financial contribution to the Council shall be made to allow the Councils highway department to make good the damage.

The proposed development will only result in 1 new trip per year, this will be a maintenance vehicle, likely a van. There would be no heavy goods vehicles attending the site at any point. Therefore, an annual survey is considered excessive in this context.

The applicant is willing to accept a suitably worded condition which requires a condition survey to be submitted prior to the commencement of any development, with a further survey submitted upon conclusion of the construction phase. In addition, the applicant would be willing to accept a condition requiring further surveys to be undertaken at the decommissioning stage at the end of the lifespan of the development.

Any accommodation works required on the public highway shall be subject to Road safety Audits, stages 1 to 4 in accordance with GG 119 of the Design Manual for Roads and Bridges. Each stage of the Road safety Audit shall be submitted for approval in writing by the Local planning Authority. All issues highlighted at each stage, being addressed to the written approval of the Local Planning Authority within 3 months of that stage of that Road safety Audit has been approved.

There are no accommodation works proposed on the public highway. Therefore, there is no requirement for Road Safety Audits to be undertaken.

The Junction of the site access with the existing highway will require vehicular visibility splays in accordance with Manual for Streets. It is recommended that during the proposed survey to collect

vehicle trip data for the TIA it also collects vehicle speed data and the 85%ile ascertained. Details of which can be provided to the Local Authority to agree the vision splay requirements of the junction.

Full construction details of the site access including long and cross sections and the tie in to the adopted highway is required.

The access is existing, with only a very slight increase in the number of trips proposed. Visibility splays of 2.4m x 90m can be achieved to both the east and to the west, a drawing demonstrating this is attached as **Document 2**. This is greater than the maximum stopping sight distances (SSD) set out within Manual for Streets, which only shows an SSD of 56m for a 37mph road.

It is acknowledged that the visibility splays are below those required within Technical Advice Note 18: Transport (TAN 18), however, there are a number of mitigating circumstances in this case.

Whilst the road is national speed limit, the road is narrow, has a steep gradient and is in very poor condition. It is clear that vehicles are forced to travel significantly slower than the speed limit. In addition, the road is also very infrequently used. Upon multiple site visits, the only traffic encountered so far has been horse riders utilising the road for treks.

It must also be emphasised that the development is proposed to generate just 1 trip per year, which is lower than the trips which would be made if the land were to be farmed. As such, the scheme will result in decrease in the use of the access. For the construction phase, where there will be an additional 6 trips per day for an approximate 15 days, a banksman will be employed to ensure that access and egress is attained safely, to sufficiently control the risk posed by vehicles. The applicant is willing to accept this as a requirement as part of the condition for the submission of a Construction Environmental Management Plan.

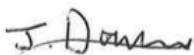
Therefore, the visibility splays should be considered acceptable, given the other safety measures proposed during the construction phase and the decrease in traffic once the solar farm is operational.

A speed survey should not be required for this development, given that the access is existing and there will be a negligible impact to traffic levels.

There are no construction details to be provided for the access as it is already existing. Long and cross sections are not considered necessary as the access is to be unchanged.

I hope that the above has address your concerns. Please let me know if any further information is required.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J. Downey'.

Josh Downey

Senior Planner

Encs.



Sun Fields, Dream Fields, Llandarcy

Consultation Representation Response

Document 1

Consultation response from NPT's Highways Team,
dated 28th June 2023

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

The Town and Country Planning (Development Management Procedure)
(Wales) Order 2015 (as amended)

HEAD OF ENGINEERING & TRANSPORT

HIGHWAYS OBSERVATIONS

PLANNING APPLICATION NO: 2/3/23/0356/00
APPLICANT: J HALE
LOCATION: SUN FIELDS, DREAM FIELDS, LLANDARCY,
NEATH, SA10 6JU
PROPOSAL: PROPOSED GROUND MOUNTED SOLAR PV
ARRAY WITH A GENERATING CAPACITY OF UP
TO 1.3MW, INCLUDING DEVELOPMENT OF
ANCILLARY STRUCTURES, FENCING AND
LANDSCAPING WORKS

The Highway Authority, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐

MY HIGHWAYS OBSERVATIONS ON THIS PROPOSAL ARE AS FOLLOWS:-

The following Highway Concerns have been identified:

1. A Transport Impact Assessment is required in accordance with TAN 18
2. Scoping route for vehicles used in the delivery and future maintenance of the facility including details of the access point onto the nearest adoptable highway and the provision of suitable visibility splays in accordance with TAN 18.

The delivery information provided as part of the submission raises some concerns in terms of volume and type of vehicles proposed.

3. Details of any borrow pits proposed to facilitate construction of the scheme
4. No development shall commence (including any site clearance), until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. The approved Statement shall be adhered to throughout the construction phases. The Statement shall provide for:

- a. **Construction methods:** details of the extent and phasing of development; details for the storage and management of plant and materials used in constructing the development
- b. **Drainage:** Details of drainage measures during construction phases to ensure that the drainage of any adjoining land, and land downstream is not interrupted or otherwise adversely affected by the development.
- c. **General Site Management:**
 - i. details of the construction programme including timetable
 - ii. details of site clearance
 - iii. details for erection and maintenance of security hoarding including decorative displays and facilities for public viewing.
- d. **Control of Nuisances:** Wheel washing facilities and measures to control light spill.
- e. **Traffic Management:**
 - i. details of site deliveries including routes of vehicles, plus delivery and construction times, taking into account the proximity of residential dwellings and any school(s) along the proposed route. It may be applicable to restrict vehicular access such as:- no deliveries in excess of 3.5 tonnes shall access or leave the site via any route during the hours of 8am to 9.30am and 2.30pm to 4pm during school term times.
 - ii. details for the loading and unloading of plant and materials; details for the parking of vehicles of site operatives and visitors
 - iii. scheme for the erection of temporary/semi-temporary signage
 - iv. The frequency and size of vehicles used to transport the waste material arising from the construction works;
- f. **Hours of working on site,** including specified hours for deliveries; details of restrictions to be applied during construction and demolition works (including timing, duration and frequency of works) to prevent noise or nuisance amenity issues to surrounding properties.

Responsible Persons: details of the persons and bodies responsible for activities associated with the CEMP and emergency contact

- 5. Proposed delivery route on NPTCBC adopted highway network may be subjected to a condition surveys before commencement of any heavy good deliveries to and from the site this includes items such as culverts. These surveys may be competed annually throughout the life of the planning consent and any defects/damage to the existing highway resulting in frequent use of HGV's will be remediated by the applicant or a financial contribution to the Council shall be made to allow the Councils highway department to make good the damage.
- 6. Any accommodation works required on the public highway shall be subject to Road safety Audits, stages 1 to 4 in accordance with GG 119 of the Design Manual for Roads and Bridges. Each stage of the Road safety Audit shall be submitted for approval in writing by the Local planning Authority. All issues highlighted at each stage, being addressed to the written approval of the Local Planning Authority within 3 months of that stage of that Road safety Audit has been approved.

7. The Junction of the site access with the existing highway will require vehicular visibility splays in accordance with Manual for Streets. It is recommended that during the proposed survey to collect vehicle trip data for the TIA it also collects vehicle speed data and the 85%ile ascertained. Details of which can be provided to the Local Authority to agree the vision splay requirements of the junction.

Full construction details of the site access including long and cross sections and the tie in to the adopted highway is required

NOTES TO APPLICANT

WORKS TO THE EXISTING HIGHWAY

Developers' attention is drawn to the provisions of Section 278 of the Highways Act, 1980 in cases where a development would require access or other works to be carried out within the existing highway. Where highway works to benefit a development require land adjacent to an existing highway to be constructed upon together with works on the existing public maintained highway, a hybrid S38/278 shall be used. Works that are to be undertaken within the existing public maintained highway only will require a S278 agreement. No Work shall be undertaken on the existing public maintained highway until the appropriate legal agreement has been entered into.

Any works undertaken on the public highway without the appropriate legal agreement with the Highway Authority, the Highway Authority has the right to request the developer to remove and/or reinstate that part of the highway back to its original condition to the satisfaction of the Highway Authority.

A plan detailing the differences between the existing and proposed highway shall be submitted to form part of the legal agreement, this should be made up of two colours, green for the proposed area to be adopted and brown for the existing highway.

Developers are reminded that consent under the Town and Country Planning Act, 1990/91, conveys no approval for works to be undertaken affecting any part of the public highway, including verges and footways. The Developer must:-

- (i) Obtain the approval of Neath Port Talbot County Borough Council as Highway Authority for the details of any works to be undertaken in the Public Highway.
- (ii) Indemnify the Authority against all claims arising from such works, including claims under the Land Compensation Act.
- (iii) Give not less than 10 working days notice in writing of the date of commencement of the works.

As part of this process you are advised that only certain contractors are permitted to undertake the works on the public highway, a list of these contractors are available from the Highway Authority's Highway Development Control Section

SIGNED:*DA Thomas*..... DATE: ...28.06.23.....
pp HEAD OF ENGINEERING & TRANSPORT

HIGHWAYS REF: OBS230356

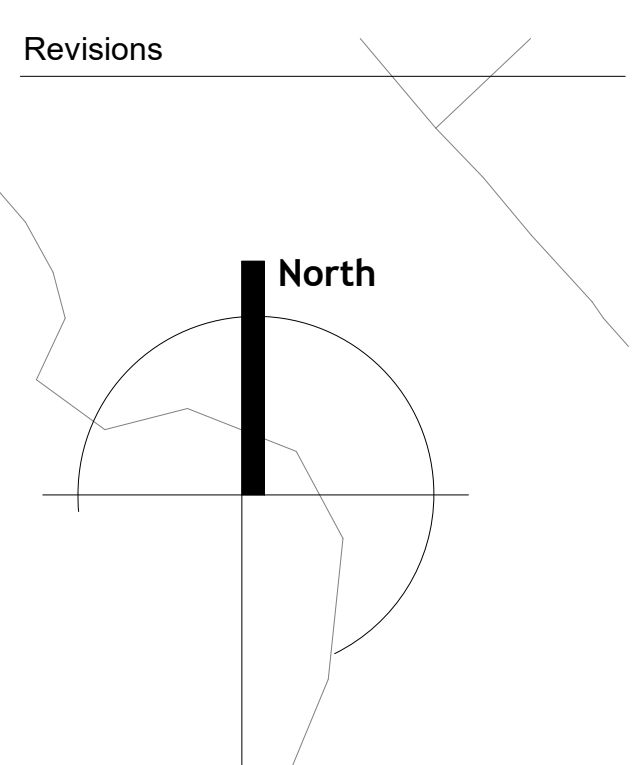
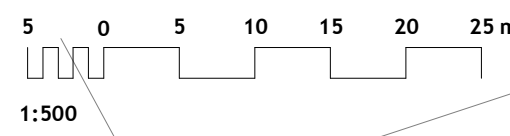
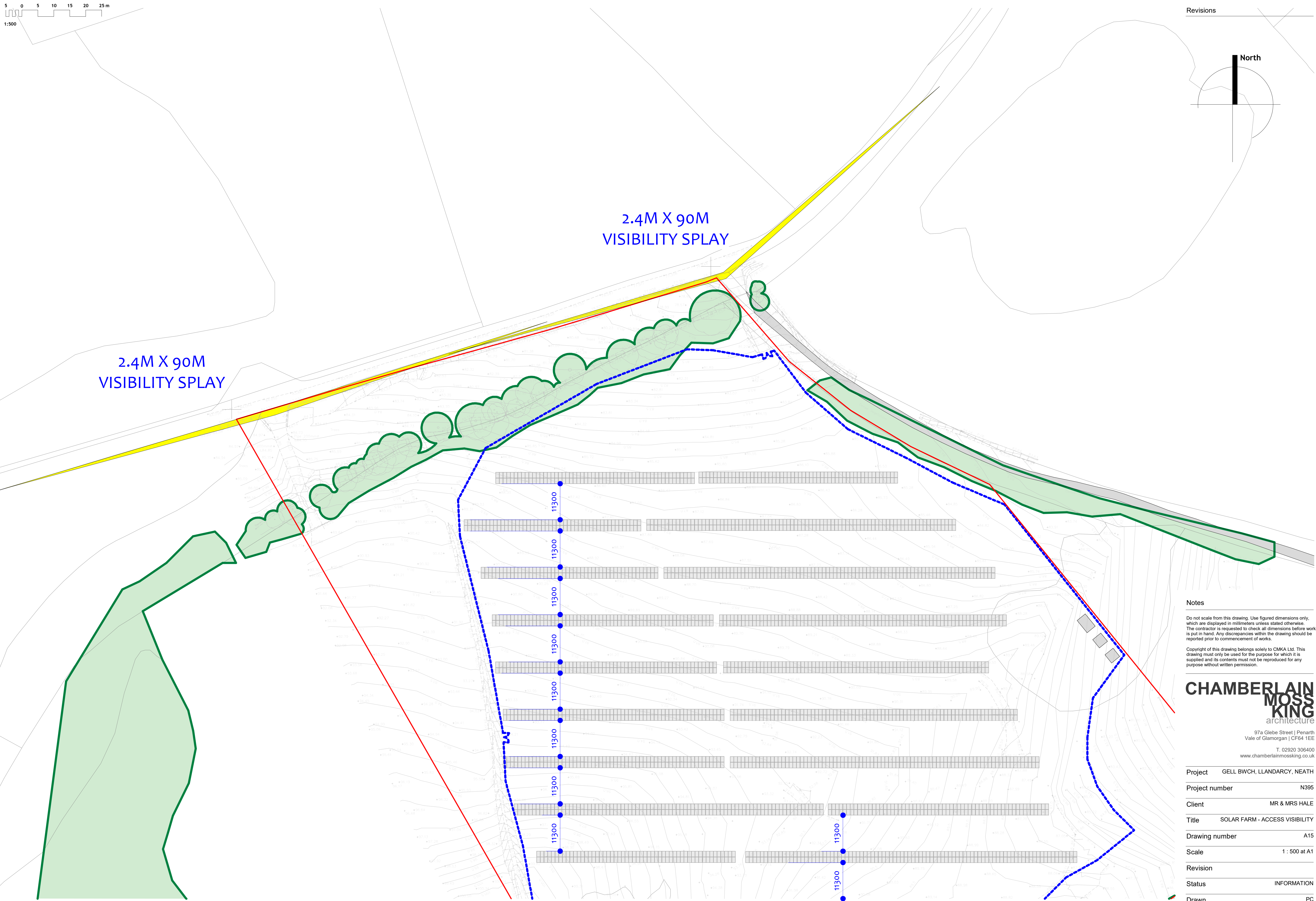


Sun Fields, Dream Fields, Llandarcy

Consultation Representation Response

Document 2

Access Visibility



Notes

Do not scale from this drawing. Use figured dimensions only, which are displayed in millimeters unless stated otherwise. The contractor is requested to check all dimensions before work is put in hand. Any discrepancies within the drawing should be reported prior to commencement of works.

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Project	GELL BWCH, LLANDARCY, NEATH
Project number	N395
Client	MR & MRS HALE
Title	SOLAR FARM - ACCESS VISIBILITY
Drawing number	A15
Scale	1 : 500 at A1
Revision	
Status	INFORMATION
Drawn	PC
Date	18.08.23