



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

21<sup>st</sup> December 2023

Our Ref. SP22-1173

Dear Claire

**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**  
**Response to Local Highway Authority comments dated 18<sup>th</sup> September 2023**

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

The consultation response from NPT's Highways Team is the second response and is dated 18<sup>th</sup> September 2023. These comments raised 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**

| LHA Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicant Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Please provide the dimensions of the panels proposed to be used on site.                                                                                                                                                                                                                                                                                                                                                                                            | The dimensions for the panels are shown on drawing ref: N395-A09. We have provided these once again for ease of reference. Please note that the spacing between panels has been reduced from 11.3m to 9m.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| The comments relating to trips are not only applicable to the delivery of the panels themselves but encompasses all deliveries such as the steel frame work for the panels, the new fencing, all imported materials such as any stone or concrete needed for construction of the substation including the substation itself and all electrical components. I feel the proposed trip generation during the construction period has been considerably underestimated. | <p>The steel frames for the panels were included in the previous trip estimation, given the size and shape of the equipment, these can easily fit around the solar panels. The inverters can also be transported by this same method, however an additional 2 long wheel based vehicle trips can be assumed in a worst case scenario.</p> <p>Attached drawing ref: N395-A17 uses vehicle tracking to demonstrate that the construction access can be safely used by an articulated lorry. The substation, Mains LV Panel, Transformer and RG RMU Unit can be accommodated via 4 HGV trips. Fencing can be transported by 2 HGV trips, whilst only a small area of concrete is proposed and can be accommodated by 3 HGV trips. 4 HGV trips are proposed for cabling (assuming one HGV per 500m of cable). This totals 13 HGV trips over the course of c.15 days, which equates to less than 1 HGV trip per day.</p> |

| LHA Comment                                                                                                                                                                                                                                                     | Applicant Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| In the interest of clarity the request for a Transport Statement from the highway department had been made under planning application P2020/0408, to ensure continuity we are willing to accept a Statement for this application.                               | <p>Having reviewed application reference P2020/0408, this was approved without the need for a Transport Statement. As such, whilst the Local Highway Authority might have requested one, this was not deemed necessary prior to the application being approved.</p> <p>Our highways submission dated 29th August 2023 provided our full reasoning why a Transport Statement is an unreasonable request for a development which results in two vehicular movements per annum.</p> <p>It makes no practical or logical sense for a full Transport Statement to be required. This would primarily be an assessment the impacts of the operational phase of development on the highway network, as a well as available Active Travel routes and the sustainable transportation credentials of the site. Given that the operational phase of development will not generate any material number of visitors to the site, no assessment of this should be required.</p> <p>Whilst we fully understand and accept the need for the impact during the construction phase to be considered, the information relating to this has already been submitted for an assessment of these impacts to be made.</p>                                                                                                                                                                                                                                                                                        |
| The condition survey of the highway will be required to cover the construction period of the development not post construction as mentioned in your Technical note. We will be requesting a highway condition survey be conditioned as part of this application | The applicant is willing to accept a suitably worded condition to this effect.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Drainage will not be commented on under the planning application process therefore your Technical Note has not been reviewed. You are advised the drainage observations provided on 28.06.23 are still relevant to this application.                            | Noted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Your visibility splay drawing does not clearly indicate the extent of the carriageway and whether or not the vision splay crosses 3rd party land. Please provide a clear drawing that clearly defines boundaries of adjoining land and the carriageway.         | <p>Further to the previous comments, we have considered the access into the site and the proposal will now include for a construction phase access and an operational phase access, using the existing field entrances into the site.</p> <p>Given the above, two new plans have been prepared and submitted. Drawing ref: N395-A17 shows the access which is to be used during the construction and decommissioning phase. The visibility splay for this access shows that well in excess of 2.4m x 100m can be achieved in each direction. Again, it is proposed that this entrance is monitoring by a banksman during the construction and decommissioning phases.</p> <p>The construction entrance is also served by an enlarged area of the public highway which allows for large vehicles to enter and exit the site, as demonstrated by the vehicle tracking shown on the submitted plans.</p> <p>For the access to be used during the operational phase (drawing ref: N395-A16), visibility of well over 2.4m x 100m can be achieved looking west. Looking east from the access, visibility of 2.4m x 65m can be achieved. Given that only one vehicle is anticipated to use this access in any year, then this will represent a reduction compared to the current use of this access by agricultural vehicles for the current use of the land. Therefore, the level of impact to highway safety is considered acceptable, due to the reduction in usage which shall occur.</p> |

| LHA Comment                                                                                                                           | Applicant Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| There are concerns over the gradient of the access point from the field with the highway, please confirm that gradient of this access | <p>This is shown on the attached drawing refs: N395-A16 and N395-A17. For the operational access, the gradient is 12.1%. For the construction access, the gradient is 8.5%.</p> <p>These are existing accesses which are used by agricultural vehicles without issue. The highway up to the site access includes section of road which have higher gradients than the access points to and from the site, so any vehicles coming to the site will be capable of traversing up and down gradients higher than the site entrances.</p> |

We consider the information provided within the submitted plans and above addresses the comments of the Local Highway Authority and will ensure the proposed development have an acceptable impact in terms of highway and pedestrian safety.

It would be much appreciated if the Local Highway Authority could be consulted on the revised details at your earliest convenience and we look forward to receiving their response in due course.

Yours faithfully



**Alex Smith**

Director

Encs.