LINCOLNSHIRE COUNTY COUNCIL'S RESPONSE TO CONSULTATION
ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: South Holland District Council
Application number: H19-0329-24
Application Type: Full-major
Proposal: Temporary ground mounted solar photovoltaic (PV) farm with battery storage, substation and associated works
Location: Land east of Guanockgate Road, Sutton St Edmund, Spalding, PE13 4PL

Response Date: 11 October 2024

This report includes the Substantive response of the Local Highway and Lead Local Flood Authority to a planning consultation received under the Development Management Order and includes details of any planning conditions or informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement.

General Information and Advice

Please note that although the Definitive Map and Statement proves the existence of any recorded rights of way, there may be further or higher rights that are not shown on this document that the County Council is not currently aware of. This would be especially relevant where the public has had informal access to the site or where there are references to routes across this in maps or other historic documents. As the County Council has received no application to recognise further rights of way affecting the site, no more informed guidance can be offered at this stage.

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Highway and Lead Local Flood Authority Report

Substantive Response provided in accordance with article 22(5) of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

Recommendation: Approve with conditions

The proposed application site consists of approximately 140.5 hectares of agricultural land to the northwest of the town of Wisbech in Cambridgeshire and just over 1.6km to the west-northwest of the settlement of Gorefield. The site falls across the jurisdiction of both South Holland District Council (SHDC)and Fenland District Council (FDC)with approximately 66.2. hectares of the site within FDC and around 74.3 hectares within SHDC. The topography of the site is generally flat. The site is bound by Guanockgate Road to the west with the junction of Elloe Bank and Broad Drove West at the northeast of the site. A public right of way (PRoW) intersects the site from north to south along Elloe Bank. Several drains maintained by the North Level District (NLD) Internal Drainage Board (IDB) run across the site. The site is surrounded by agricultural land on all other sides. The nearest residential property to the east is located approximately 160m to the northeast along Broad Drove West and the nearest property to the west of the site is located approximately 400m away along Guanockgate Road. To the south of the site the nearest properties are along Elloe Bank and are approximately 490m away from the site. A public right of way (PROW) passes through the site in a west to east direction along the top of the fields and through the centre of the site from north to south. The section of PROW in the western portion of the site to the east falls within the LCC and SHDC boundary. The section of PROW (a bridleway) beyond intersecting the site from north to south falls within CCC and FDC. The PROW running along the southern boundary of the eastern portion of the site is a byway and falls within CCC/FDC boundary. Access to the site is via an access track running parallel to the PROW (which are reached via Guanockgate Road to the west).

Access to the site will be obtained from Guanockgate Road via the existing site access and internal hardstanding areas which currently serve the site. New access tracks will be constructed to serve the development areas, enabling the transportation of construction materials, solar panel components and BESS units. The site will incorporate turning areas and a temporary construction compound suitable to allow construction vehicles to access and egress the site safely in forward gear. Due to the nature of the proposals, the impact on the highway will be temporary, attributed to the construction vehicle movements required during the construction and decommissioning phases. It is considered that the primary access routes would be to and from the south of the site, via the local roads which connect to the B1166. The B1166 provides routes all directions, in addition to connecting to the A47 and A16. Cross Road is a single carriageway road which routes in an east-west alignment and connects Guanockgate Road and Broadgate to the west of the site location. It is subject to a 40mph speed limit. Although the eastern section of Cross Road is too narrow in places to enable a HGV to pass a car in accordance with dimensions set out in Manual for Streets, there are opportunities for vehicles to pass using the grass verges and informal passing places located within the adopted highway. This section extends over a short distance and vehicles are

provided with appropriate levels of forward visibility to assist with passing. Due to the low number of dwellings in this location, the likelihood of vehicles needing to pass construction traffic will be low, particularly when construction movements will be kept low and managed as part of a CTMP. However, there are opportunities to create either a new passing place or minor widening within the available adopted highway to assist movements along this section. Therefore, mitigation measures will be required. The carriageway widths along the western section of Cross Road are appropriate for accommodating HGV movements safely. This section also consists of straight sections of carriageway, providing appropriate forward visibility between vehicles. Broadgate is a single carriageway rural road which routes in a north-south alignment between New Fen Dike to the north and the B1166 to the south of the site. It is located approximately 560 metres to the west of the site location and connected to Guanockgate Road via Cross Road. It is subject to a 60mph speed limit (national speed limit). The carriageway measures between approximately 5.5m – 6.5m in width, with additional width available within grass verges and informal passing places located along its length. These carriageway widths are appropriate for accommodating HGV movements safely in accordance with MfS. In addition, the route consists of straight sections with appropriate forward visibility between vehicles. The B1166 is a single carriageway road which routes in an east-west direction to the south of the site location, connecting to the A16 to the west. The B1166 connects to the B1187 to the southeast and the B1167 to the southwest. The B1166 is subject to a 40mph speed limit within the vicinity of the site location. The B1187 is a single carriageway road which continues south from the B1166 to the southeast of the site. At this location the carriageway narrows as it passes over a stone bridge which crosses New South Eau (Drain). From here the B1187 routes south and forms the minor arm of the ghost-island right-turn lane junction arrangement with the A47, with left-out only movements allowed. The B1187 is subject to the national speed limit (60mph for single carriageway roads) within the vicinity of the site location. The B1167 is a single carriageway road which connects the B1166 to the A47 to the south, largely through open countryside. The B1167 is subject to a 50mph speed limit within the vicinity of the site location. Apart from the narrow bridge on the B1167/B1166, these routes generally measure between approximately 5.5m – 6.0m, and benefit from centreline carriageway markings. These carriageway widths are appropriate for accommodating HGV movements safely.

Personal Injury Accident (PIA) data has been obtained from road safety data published annually by the Department for Transport (DfT). The most recent seven years of data has therefore been reviewed, which includes the most recent five full years of data outside of the pandemic. The study area considered within the analysis includes the site access location as well as local roads between the site and the wider road network. Over the seven-year period, a total of five PIA's was recorded within the study area. Four of these were classified as slight with one recorded as a serious injury accident. No fatal accidents were recorded. The serious incident occurred at the junction between New Fen Dike and Broadgate to the north of the site and involved one vehicle (motorcyclist). As an isolated incident over a seven-year period there is no evidence of a specific road safety issue in this location. None of the PIA's involved cyclists. None of the PIA's occurred along Guanockgate Road or at its connecting junctions with the B1166 and New Fen Dike. Indeed, further analysis shows no accidents occurred within the vicinity of the access over the entire 24 years of recorded data. As such, there is no evidence of a road safety issue within the vicinity of the access over an extended period. This access and route have safely accommodated movements associated with the existing uses over this time. There were no clusters of four or more PIAs occurring in the same location, therefore no evidence to suggest a re-occurring road safety issue. As such, although all incidents are regrettable, the PIA data does not suggest a road safety issue that would be

exacerbated by the proposals, particularly when considering that most of the proposed traffic generation would occur over a short-term temporary period and be subject to several controls.

The site access accommodates up to 16.5m long articulated vehicles for construction, which represent the largest vehicle size required to transport components and materials to the site. However, most of these vehicles are likely to be rigid HGVs of up to 10m in length, which can transport all construction materials and components. Only the BESS units and substation components are likely to require transportation by larger articulated vehicles of up to 16.5m in length. The existing access comprises an access road of approximately 4.0m-4.8m, with approximately a 10m radii connecting to Guanockgate Road. The junction has a bellmouth width of c.16m. The proposals include minor widening to the access road to enable 16.5m long articulated vehicles (the largest vehicle expected at the site) to access and egress the site safely. Visibility for drivers emerging from the access is shown at 2.4m x 153.8m in each direction using a 1m carriageway offset, in accordance with recommendations within Manual for Streets 2 (MfS2) for 60mph speeds. These splays can be accommodated entirely within the adopted highway. Deliveries can be scheduled via a booking system, avoiding peak hours and the access will be controlled by qualified banksperson(s) to ensure vehicles enter and exit the site safely. The banksperson will manage vehicle movements to and from the access and provide additional awareness for PRoW users who share the private access and additional banks persons will be deployed at all junction on the designated route to and from the development site. PRoW footpaths route through and around the site, and the proposed layout shows five locations where vehicles will be required to crossing the PRoW to serve the solar panel fields from the existing access off Guanockgate Road. Where the vehicular access routes cross the PRoW, suitable signage will be displayed, warning pedestrians of the presence of construction traffic and drivers of the presence of pedestrian movements. Suitable crossings will also be provided with visibility between vehicles and pedestrians. PRoW currently share the existing farm access tracks with agricultural vehicles, and as such these users are already aware of vehicles using these routes.

In Weeks 1-2 it is expected that there would be deliveries relating to site set up, cabling, site compound set up and plant machinery (i.e. mobile cranes). Containers would be delivered to serve as offices and welfare facilities for staff, such as toilets. These components would be delivered in approximately 30 HGVs (60 two-way movements). At this time, deliveries would be required to secure the development site, which would include deliveries of the site security measures, such as security fencing to be placed around the perimeter of the site. It is estimated that the security fencing would require approximately 10 HGV deliveries (20 two-way movements) for the fencing panels. During Weeks 3-15 it is expected that some c.4,620 m3 of stone would be required to create the access tracks and compound areas. The stone for the access tracks is based on the length of access road (c.4,000m), with a 10% allowance for turning areas and compounds based on the site layout plan in Appendix A. For robustness, it has been assumed the depth of the road would be 0.3m and the width would be 3.5m. It is assumed that the stone would be transported to site in HGV deliveries that can carry 20m3 of material, therefore it is estimated that the stone would be transported in some 231 HGV deliveries (462 two-way movements). The access tracks will remain on site following construction throughout the operational and decommissioning phases. It is also expected that the substation will require 1,050 m3 of stone material, which would generate an additional 53 vehicles or 106 movements during this period. During Weeks 16-20 it is expected that some c.864 m3 of concrete will be required for the BESS, customer substation, transformers and components. This material/ would be transported using 8 m3 concrete vehicles, therefore it is

estimated that 109 deliveries are required (218 movements). During Weeks 21-26 it is expected that the solar panel frames would be delivered in 55 HGVs (2,000 units per HGV), equating to 110 movements. The forecast is for the solar panels to be delivered in 271 HGVs (542 movements) over weeks 21-45, with some of these movements delivered alongside the frames. During Weeks 27-45 it is expected that the majority of solar panels will be delivered. Additional electrical equipment such as the inverters will also be delivered alongside the panels, requiring 17 HGV deliveries (34 movements). During Weeks 46-47 it is expected that the 12m long containers for the BESS components will be delivered as single HGVs equating to 38 vehicle arrivals or 76 vehicle movements. In addition, there would be 6 HGVs (12 two-way movements) relating to the BESS inverter cabins. During Weeks 48 and 49 it is expected that the substation components will be delivered to the site using 20 HGVs, which equates to 40 vehicle movements. During this time demobilisation of
the site will also be undertaken using 22 HGVs (44 movements).

In summary, the construction phase of the proposed solar and BESS development is forecast to generate approximately 862 HGV deliveries (1,724 two-way movements) over the assessed 49-week period. This equates to an average of 3 HGV deliveries per day across the entire period. During the peak weeks, it is estimated there would be up to 4 HGV deliveries per day (8 movements). This would equate to one HGV movement every hour, on average, across the busiest weeks of the temporary construction programme. A maximum of 30 staff has been assumed during the construction phase. This equates to a maximum of 60 two-way movements on a typical day.

Three potential routes have been considered, and these are summarised as follows: Route 1: To and from the A47 at New Cut Roundabout, via Guanockgate Road, the B1166 and the B1167. Route 2: To and from the A47 at New Cut Roundabout, via Guanockgate Road, Cross Road, Broadgate, the B1166 and the B1167. Route 3: To and from the A47 (Fen Road), via Guanockgate Road, the B1166 and the B1187. An assessment of the surrounding road network has been undertaken to determine the most appropriate route to accommodate the forecast HGV deliveries which are expected to occur over the temporary construction period. Based on a review of the potential routing options, it has been considered that the preferred route for all construction vehicles would be to and from the A47 at New Cut Roundabout, via Guanockgate Road, Cross Road, Broadgate, the B1166 and the B1167 (Route 2), for the following reasons: Carriageway widths would support two-way movements for HGVs for the majority of the route (with the exception of a short section of Cross Road). The majority of the route comprises higher category roads such as the B1166, B1167 and A47, which are suitable for accommodating larger vehicles. There are no HGV movement restrictions and/or weight and height limits. There is a minimal impact on residential areas and no schools are located along the route.

The route analysis identifies a narrow section of the route at the eastern end of Cross Road, which extends over a 320m distance. As such, a passing place/road widening is proposed as shown on drawing C23103-ATPDR- TP-003 at Appendix C. This passing place/road widening can be delivered within the adopted highway and would be subject to agreement with LCC. The location of the passing place/road widening enables appropriate inter-visibility in either direction along this route, allowing vehicles to pass safely. The deliveries to the site would be co-ordinated to avoid large numbers of vehicles arriving and departing from the site at the same time. If required, a vehicle booking system can be implemented so that vehicles do not pass on the narrower section of Cross Road, as far as possible, although there is sufficient space for this to occur using the proposed passing place. The booking system could allow, for

example, vehicle arrivals only during one hour and vehicle departures only during the following hour, to ensure that vehicles associated with the site are not queuing on Guanockgate Road. Due to the low levels of traffic predicted during the construction period, vehicle movements can be managed effectively with the proposed management measures.

The proposed solar farm will have a capacity of approximately 49.9MW using solar panels fixed to the ground via metal piles and supporting infrastructure. The scheme will be operational for up to 40 years and so the application is for 40 years from the date of first energisation plus up to 1 additional year each for construction and decommissioning; totalling 42 years. Once decommissioned, the solar panels, battery storage and associated infrastructure will be completely removed, and the land returned to its former use. The landscape and biodiversity enhancements introduced through this proposal will remain and will be compatible with continued agricultural use. In terms of its impact on the highways network and on traffic and safety, the Transport Statement (February 2024) submitted with the application, demonstrates that the proposal will not have an adverse impact. The statement demonstrates how all key components have been addressed and how the scheme responds appropriately in this regard. The Flood Risk Assessment (FRA) and Surface Water Management Plan (November 2023) noted that the site falls within Flood Zone 3, however, with adequate flood risk mitigation, the site is considered acceptable in policy terms and would accord with the requirements of the NPPF.

A Transport Statement has been produced by Apex Transport and is included with the planning application submission. This shows that the safest and least disruptive route for construction and operational vehicles to enter and exit the site have been chosen. The Statement analyses how the proposed route can accommodate the traffic requirements for the construction of the scheme. It provides estimated number of vehicles, details of the frequency and duration of movements, delivery hours and timing, consideration of public comments on this issue, vehicle routing considerations, swept path analysis, traffic management proposals during operation and details of the access points. Regarding the site when in operation, the Transport Statement notes that “all routine maintenance including cleaning, ground keeping, inspection and preventative maintenance will be carried out by vehicles no larger than vans.” This enables existing access routes to be used and limits transport issues with the wider community. There will be approximately 1-2 visits per month resulting in a maximum of 4 vehicle movements during operation. The accompanying report demonstrates that both the nominated route and site access can accommodate the largest vehicles proposed. Additionally, the route will not disrupt local traffic in the area nor would the scheme inconvenience or compromise the safety of other road users. In terms of its impact on transport and highway traffic and safety, the proposal complies with the relevant SHDC local policies together with the relevant provisions of the NPPF.

A preliminary Flood Risk Assessment (FRA) along with surface water drainage strategy was undertaken by Flood line consulting. The results of this were discussed with Lincolnshire County Council (LCC) as Local Lead Flood Authority (LLFA) as part of the pre-application advice service. Flood line consulting also engaged the Environment Agency for pre-application advice on flood risk. In the case of Solar Farms, the received wisdom is that the individual array panels, being angled to optimise the collection of sunlight, cast any water falling upon them onto the ground directly beneath their lower edge. Rainwater then infiltrates into the ground within a metre or so of where it would have fallen had the array panel not been there. Surface water run-off is thus not concentrated in any one area and should not therefore increase surface water flood risk.”

There is no precise definition of "severe" with regards to NPPF Paragraph 109, which advises that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Planning Inspector's decisions regarding severity are specific to the locations of each proposal, but have common considerations:

- The highway network is over-capacity, usually for period extending beyond the peak hours
- The level of provision of alternative transport modes
- Whether the level of queuing on the network causes safety issues.

In view of these criteria, the Highways and Lead Local Flood Authority does not consider that this proposal would result in a severe impact with regard to NPPF.

Highway Informative 02

In accordance with Section 59 of the Highways Act 1980, please be considerate of causing damage to the existing highway during construction and implement mitigation measures as necessary. Should extraordinary expenses be incurred by the Highway Authority in maintaining the highway by reason of damage caused by construction traffic, the Highway Authority may seek to recover these expenses from the developer.

Highway Informative 03

The permitted development requires the formation of a new/amended vehicular access. These works will require approval from the Highway Authority in accordance with Section 184 of the Highways Act. Any traffic management required to undertake works within the highway will be subject to agreement. The access must be constructed in accordance with a current specification issued by the Highway Authority. Any requirement to relocate existing apparatus, underground services, or street furniture because of the installation of an access will be the responsibility, and cost, of the applicant and must be agreed prior to a vehicle access application. The application form, costs and guidance documentation can be found on the Highway Authority's website, accessible via the following link: https://www.lincolnshire.gov.uk/licences-permits/apply-dropped-kerb.

Highway Informative 08

Please contact the Lincolnshire County Council Streetworks and Permitting Team on 01522 782070 to discuss any proposed statutory utility connections, Section 50 licences and any other works which will be required within the public highway in association with the development permitted under this Consent. This will enable Lincolnshire County Council to assist in the coordination and timings of these works. For further guidance please visit the Highway Authority's website via the following link: Traffic Management - https://www.lincolnshire.gov.uk/traffic-management

Highway Condition 00

The development hereby permitted shall be undertaken in accordance with a Construction Management Plan and Method Statement that shall first be approved in writing by the Local Planning Authority. The Plan and Statement shall indicate measures to mitigate the adverse impacts of vehicle activity and the means to manage the drainage of the site during the construction stage of the permitted development. It shall include;

- the phasing of the development to include access construction;
- the on-site parking of all vehicles of site operatives and visitors;
- the on-site loading and unloading of all plant and materials;
- the on-site storage of all plant and materials used in constructing the development;
- wheel washing facilities;
- the routes of construction traffic to and from the site including any off-site routes for the disposal of excavated material and;
- strategy stating how surface water run off on and from the development will be managed during construction and protection measures for any sustainable drainage features. This should include drawing(s) showing how the drainage systems (temporary or permanent) connect to an outfall (temporary or permanent) during construction.

Reason: In the interests of the safety and free passage of those using the adjacent public highway and to ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, the permitted development during construction.

Highway Condition 21

No part of the development hereby permitted shall be occupied before the works to improve the public highway by means of road widening/passing places along Cross Road and the existing access have been certified complete by the Local Planning Authority.

Reason: To ensure the provision of safe and adequate means of access to the permitted development.

Highway Informative 07

The highway improvement works referred to in the above condition are required to be carried out by means of a legal agreement between the landowner and the County Council, as the Local Highway Authority.

For further guidance please visit our website; www.lincolnshire.gov.uk/highways-planning/works-existing-highway

Highway Condition 33

The permitted development shall be undertaken in accordance with a surface water drainage scheme which shall first have been approved in writing by the Local Planning Authority.

The scheme shall:

- be based on the results of evidenced groundwater levels and seasonal variations (e.g. via relevant groundwater records or on-site monitoring in wells, ideally over a 12-month period);
- be based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development;
- provide flood exceedance routing for storm event greater than 1 in 100 year;
- provide details of how run-off will be safely conveyed and attenuated during storms up to and including the 1 in 100 year critical storm event, with an allowance for climate change,

from all hard surfaced areas within the development into the existing local drainage infrastructure and watercourse system without exceeding the run-off rate for the undeveloped site;

- provide attenuation details and discharge rates which shall be restricted to 1.4 litres per second;
- provide details of the timetable for and any phasing of implementation for the drainage scheme; and
- provide details of how the scheme shall be maintained and managed over the lifetime of the development, including any arrangements for adoption by any public body or Statutory Undertaker and any other arrangements required to secure the operation of the drainage system throughout its lifetime.

No dwelling/ no part of the development shall be occupied until the approved scheme has been completed or provided on the site in accordance with the approved phasing. The approved scheme shall be retained and maintained in full, in accordance with the approved details.

Reason: To ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, or upstream of, the permitted development.

Highway Condition 35

Prior to the commencement of any part of the development hereby permitted, the condition of the parts of the carriageways along the proposed route that will be used by vehicles making deliveries of materials and components to the permitted development shall be recorded by written notes, still and moving photographic images during an inspection that shall be undertaken by the Applicants' representatives in the company of an officer of the Local Highway Authority. Those public roads shall be maintained, at the cost of the Applicants, in a safe and suitable condition throughout the construction phase of the permitted development and shall be reinstated to no less than the standard of their pre-commencement condition following completion of the construction phase. The Applicants shall also follow a reciprocal process during the decommissioning of the permitted development.

Reason;
To ensure the safety and free-passage of the public using the carriageway along the proposed route during the construction and decommissioning of the permitted development.

Officer's Name: Dean Whitehead
Officer's Title: Senior Development Management Officer
Date: 11 October 2024