



Development of national significance in the renewable energy sector

Highways Position Statement

Penderi Solar Farm,
Land at Blaenhiraeth Farm,
Llangennech, Llanelli, SA14 8PX

VARIATION SUBMISSION

December 2020 | BRS.4254



Penderi Solar Farm Highways Position Statement

REF: BRS.4254

DATE: DECEMBER 2020

1 Introduction

- 1.1 A Development of National Significance (DNS) planning application for Penderi Solar Park was made to the Welsh Minister in January 2020. The application was submitted by Pegasus Group on behalf of Voltalia UK Ltd.
- 1.2 The planning application was accompanied by a Construction Traffic Management Plan (CTMP) dated January 2020, which was prepared in consultation with the Local Highway Authority (LHA) at Carmarthenshire County Council (CCC), which included a detailed site visit and undertaking traffic and speed surveys.
- 1.3 Whilst the CTMP has been agreed with the LHA, a number of third-party representations have recently been received which object to the grant of the planning permission for the development. As a result of consultation responses, the applicant notified the Planning Inspectorate of its intention to vary the development proposal in December 2020. This Note has therefore been prepared in response to the highway related issues raised and is submitted in support of the variation.

2 Summary of Third-Party Representations

- 2.1 The main highway related issues raised by the third-party representations are as follows:

Third Party	Issue
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Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

<p>Geraint John Planning on behalf of Blaenhiraeth Fach</p>	<p>The local highways network consists of narrow, country lanes which have been built fundamentally to service the existing local, small scale family businesses within the area. The highway network is not suitable for the increased number of vehicle journeys nor the size of HGVs. Although it is proposed within the construction period that the existing access track is widened by 6m for the first 30m, this does not consider the surrounding tracks and roads which are not suitable for these vehicle movements.</p>
<p>Geraint John Planning on behalf of Blaenhiraeth Fach</p>	<p>Within the local area, there have been many accounts of traffic incidents where larger vehicles have encountered issues with the highway network [examples provided]. With the absence of real consideration of the impact of vehicles during the estimated 8 – 12-month construction period, the application should be refused based on the premise that the roads are not designed to withstand the pressure of the vehicles, and as such, are a risk in terms of health and safety.</p>
<p>Mrs C J Williams</p>	<p>The large plans will obviously require construction and therefore require access. The road adjacent to the development - A476 has a number of notorious bends and this particular stretch of road has seen a number of fatal road traffic accidents. The road displays signs showing the number which is in the hundreds. What consideration has been given to this and the impact of increasing the risk of causing further accidents?</p>
<p>Llanelli Rural Council</p>	<p>Highway access is a concern and the number of perceived daily traffic movements along the access route to service the construction of the solar farm and ongoing upkeep and maintenance of the site thereafter is considered to be detrimental to highway safety. The local road infrastructure is substandard to support this major development proposal.</p>
<p>Alun Owens</p>	<p>I also notice that the road accident report fails to mention the correct number in incidents and on further investigation actually turns a blind eye to serious incidents along the A476 that should most certainly be</p>

	considered for the size of the development, both in the form of solar glint and glare and visual distraction to road users ¹ .
Alun Owens	I would also like to note that on the accident report they have the incorrect road listed, the A475, not the A476, the report is riddled with mistakes and irregularities.
Lionel Jones	Site A is visible from the accident prone A476 at many places along its route to the western side of the valley. The A476 is statistically the second most dangerous road in Carmarthenshire and there have been numerous accidents, including some fatal, on the short stretch of road between Morlais Bridge and Clochyrie in recent years. The application documentation erroneously refers to the A475 - just one of many discrepancies and omissions noted in the application documents!
Lionel Jones	If development at Site A is refused this will avoid the adverse impact construction traffic will have on the access route from the B4306 along the U2309 Cilddewi Road which is wholly unsuitable for heavy traffic.
Lionel Jones	Likewise, those parts of Site B adjacent to the dangerous A476 at Clochyrie should be relocated nearer to Blaenhiraeth Farm so as to reduce the overall footprint and adverse impact at this location.
Barnaby Rees-Jones	The road safety assessment claims that there are very few incidents reported on the A476 near to the proposed site entrance. On checking their reference to the crashmapper website and looking at the locality itself I can see this isn't in fact true, and more than a dozen incidents are recorded within 100m up to Clochyrie Farm, most of Serious Incident status and some with fatalities within the last 5 years. There are even incidents which haven't been recorded as I know of two fatalities on the bend in the road by Wayside which do not show on the online database. This incomplete dataset could warp results and probably isn't a reliable source for road safety data given the consequences that misrepresentation could result in. They actually document the road as the A475, which is the wrong road completely.

¹ The Glint and Glare Assessment submitted in support of the original planning application considers the potential impacts of the development upon the A476.

	Whether this is deliberate or a mistake, it is of major concern when it is fundamental to the Health and Safety of the project.
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2.2 To summarise, the highway related issues raised by the third-party representations largely relate to the proposed access arrangements, the suitability of local roads and the local accident history.

3 Response to Third Party Representations

3.1 The application for the proposed solar farm was accompanied by a CTMP, which contained information on the access proposals and mitigation measures considered necessary to facilitate this development. This report has been agreed with the LHA at CCC.

Issue One – Access Arrangements

3.2 The proposed access arrangements are set out in the CTMP and have been agreed with the LHA further to undertaking a site visit, reviewing the existing conditions, including traffic flow and speed surveys, and undertaking swept path analysis.

3.3 The main construction compound will be located within Site B, which will take access from the A476. Smaller vehicles will then distribute materials and plant to Site C via internal tracks and roadways and to Site A via the B4306 and U2039. Appropriate junction improvements will be provided, along with a Temporary Traffic Management (TTM) scheme at the B4306 / U2039 junction.

Issue Two – Suitability of Local Roads

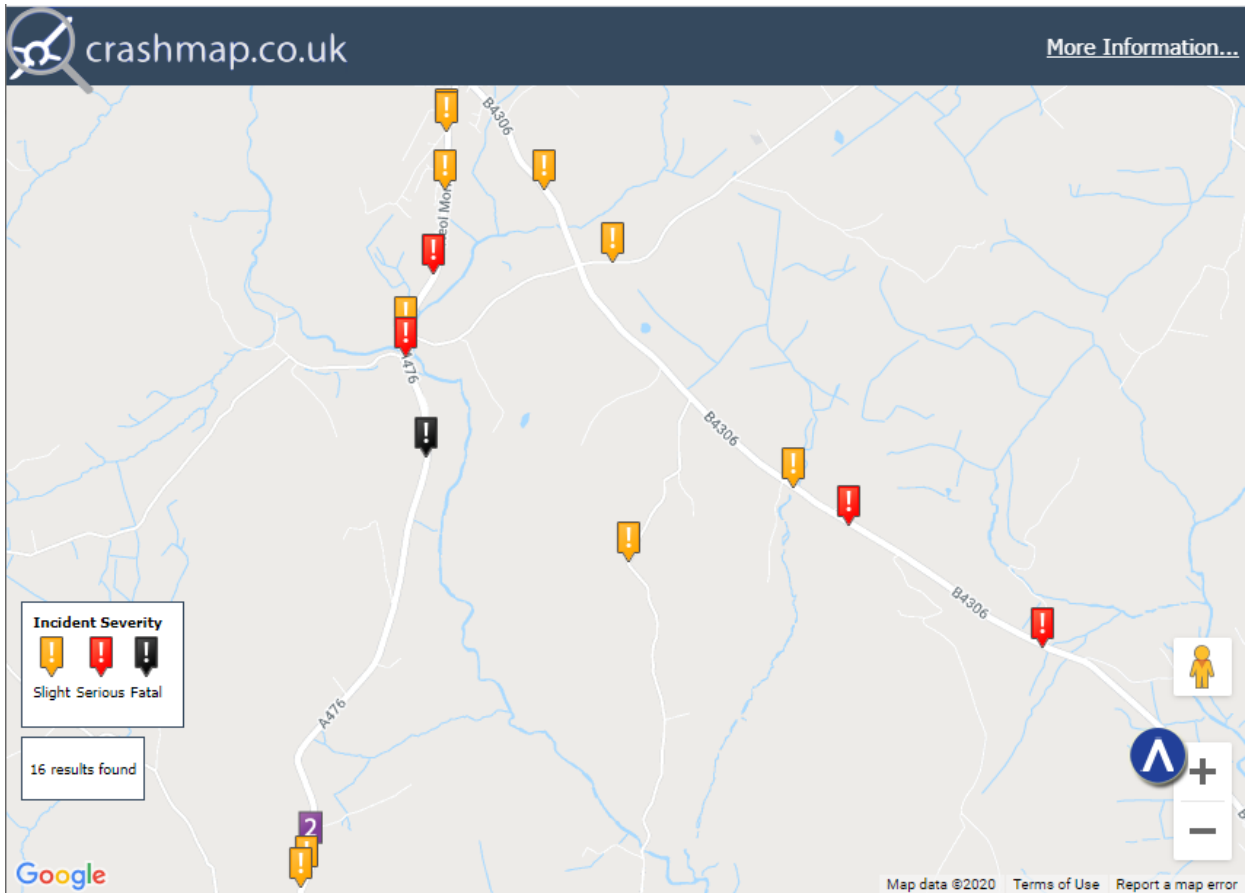
3.4 The CTMP provided due consideration of the character of local roads. As deliveries to Site A will have to be made using the B4306 and U2039, six passing places will be provided on the U2039, along with some areas of widening. The passing places will be a minimum of 6m wide, with a bound surface and full height kerbs. These will avoid head on conflicts and let traffic flow during the construction period and beyond.

3.5 Vegetation within the Client / landowners control will be cut back to improve junction visibility splays wherever possible / required. This approach is set out in detail within the CTMP and has been agreed with the LHA. It is considered that all works can be carried out within the adopted highway extents based on records provided by Carmarthenshire County Council.

3.6 However, in the interests of mitigating the impacts further, the use of smaller vehicles (tractor and trailer) has been considered and this is set out in more detail in the revised CTMP. This confirms that, if considered necessary by the Inspector, a tractor and trailer can traverse the U2039 without the need for any off-site highway improvements. Vehicle movements would be managed / mitigated through banksmen and temporary traffic signals to control flows into and out of the development site and background traffic will be given priority over construction traffic at all times. The Applicant would be willing to conduct a pre- and post- construction condition survey of the U2039 between the B4306 and the site access and reconcile any damage that may be caused during the temporary construction period.

Issue Three – Accident History

- 3.7 The CTMP reviewed the accident history for the A476 (not the A475), B4306 and U2039 within the vicinity of the site. This demonstrated that there had been 10 accidents in the most recent five-year period available on the Crashmap website. It was concluded from the low number of recorded Personal Injury Accidents (PIAs) that there was no evident accident patterns or problems on the local highway network in the vicinity of the site that would be affected by the forecast construction trips and appropriate mitigation measures that have been agreed with the Local Highway Authority. No fatal accidents were identified within the study area.
- 3.8 The approach to reviewing the accident history, the study area, the study time period and the conclusions have all been agreed with the Local Highway Authority.
- 3.9 In response to the third-party representations, the data has been reviewed. Since the time of the original assessment, the Crashmap website has been updated to include accidents that occurred at the end of 2018 and within 2019. Data for 2020 will not be available for some time (each year's collision data is released around May by the Department for Transport). As can be seen within the screenshot below, Crashmap now identifies 16 accidents that have occurred within the study area and within the most recent five-year period available.



3.10 These accidents can be summarised as follows:

	Fatal	Serious	Slight	TOTAL
A476	1	3	7	11
B4306	0	2	2	4
U2039	0	0	1	1
TOTAL	1	5	10	16

- 3.11 The fatal accident occurred on the A476 within the vicinity of Pen Llwyn Racca at 01:40 on Wednesday 21st November 2018. This is around 1.8 kilometres to the north of the Site B site access. It only involved one vehicle in dry conditions and not at or within 20 metres of a junction. The vehicle collided with a telegraph / electricity pole on a straight section of the road, so is likely to have resulted from the driver losing control of their vehicle.
- 3.12 One of the serious accidents on the A476 occurred around 230m to the north of the Site B access. It appears to have been a head-on collision on a straight section of the road. It occurred at 10:15 on Thursday 4th April 2019 during wet conditions.
- 3.13 The other two serious accidents on the A476 occurred around 2.2 kilometres and 2.6 kilometres to the north of the Site B access. The accident at 2.6 kilometres north of the Site B access appears to have occurred when a car attempted to overtake a pedal cycle but collided with it. This accident occurred at 11:50 on Sunday 11 March 2018 during dry conditions. The accident at 2.2 kilometres north of the Site B access appears to have occurred when a car crashed into vehicles that were slowing down or stopping ahead, which also impacted a car travelling in the opposite direction. This accident occurred at 18.14 on Thursday 10 December 2019 during dark and damp conditions.
- 3.14 In terms of other fatal accidents on this stretch of the A476, the Crashmap search was extended to cover the full 21 years available (1999 to 2019). This identified two further fatal accidents. These occurred around 650m and 800m to the north of the Site B access. However, these accidents date back to 2002 and 2005 and are therefore too old to be considered relevant. As set out above, it has been agreed with the LHA that the most recent five-year period is the appropriate period for assessment. It is notable that the CCC website also refers users to Crashmap to view the latest five years of data recorded by Dyfed Powys Police.
- 3.15 The serious accidents on the B4306 occurred around 850m and 1.8km to the southeast of the U2039 junction and are not therefore within the route for construction vehicles and are not therefore considered to be relevant. The same applies to one of the slight accidents, which occurred around 550m to the southeast of the U2039 junction.

- 3.16 It is concluded from this updated accident analysis that the number of PIAs recorded within the study area remains low, with no evident patterns or problems. Furthermore, there is no reason to suggest that the addition of the forecast construction trips, over a relatively short period of time, would have any impact on the safety of the local highway network. Critically, no incidents on the A476 appear to have involved large delivery type vehicles. Whilst one slight incident on the B4306 involved a goods vehicle of between 3.5 and 7.5 tonnes, but this vehicle was not impacted – it appears that the other vehicle involved (a car) collided with an object located off to the side of the carriageway.
- 3.17 The use of the proposed access junctions and local roads has been considered with the LHA further to a site visit and agreement of the CTMP. If the LHA considered that there were any unsafe routes, it would have advised on this and the CTMP would have taken this into account. However, this did not occur and so it is reasonable to conclude that the LHA consider the local highway network to be suitable to accommodate the vehicles associated with both the operation and construction of the site with the agreed mitigation package.

Other Issues - Inaccuracies

- 3.18 The third-party representations suggest that there are inaccuracies within the documentation submitted in support of the application.
- 3.19 Whilst third parties state that the accident analysis documents the road as the A475, it is confirmed that the CTMP correctly refers to the road as the A476.
- 3.20 And whilst the CTMP was prepared on the basis of a 20-week (4-5 month) construction period, it is now understood that the construction period is more likely to be 32 weeks. However, this means that the intensity of construction activities will likely be reduced from that set out at paragraph 6.11 of the original CTMP, with fewer vehicle movements per day.
- 3.21 Ultimately, the contents of the CTMP have been fully considered and agreed by the LHA. A revised CTMP has been prepared which has been updated to consider the amendments made to the proposed development.

4 Conclusion

- 4.1 This Note and the previously submitted CTMP have demonstrated that the concerns raised by third parties regarding the suitability of local roads have been addressed through various mitigation measures, including the use of smaller vehicles and / or provision of six new passing places on the U2039 and cutting back vegetation to improve existing junction visibility splays wherever possible / required.
- 4.2 The updated accident analysis contained within this Note has confirmed that the number of accidents that have occurred within the study area remains low, with no evident patterns or problems. Furthermore, there is no reason to suggest that the addition of the forecast construction trips, over a relatively short period of time, would have any impact on the safety of the local highway network. The concerns raised by third parties concerning highway safety are therefore unfounded.
- 4.3 This Note has been prepared in accordance with the CTMP submitted in support of the planning application, which was prepared following comments from the LHA at CCC, undertaking a detailed site visit and undertaking traffic and speed surveys. The contents of the CTMP have been fully considered and agreed by the LHA. A revised CTMP has been prepared. This does not materially affect the development proposals. However, it confirms additional mitigation measures, including the use of smaller vehicles, for the U2039.

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