

**Planning Act 2008 and the Infrastructure Planning  
(Examination Procedure) Rules 2010.  
Rule 10 Statement made by Welsh Government  
in relation to the proposed Brechfa Forest West Wind Farm.**

**1. References.**

**IPC Reference: EN010008**

**Welsh Government Reference: qA1016378**

**2. Written Representations Summary on the Draft Development Consent Order and Requirements for the Construction Traffic Management Plan.**

**a) Development Consent Order Schedule 1 Part 3 Paragraph 8**

For the purpose of this response I seek to clarify the requirements of the timing and content of the Construction Traffic Management Plan (TMP) to be included in the draft Development Consent Order (DCO).

The document tabled at the Issue Specific Hearing on 12<sup>th</sup> July 2012 (Appendix A) reiterates the requirements of the TMP as previously detailed in the Welsh Government letter to the IPC dated 12/01/12. I confirm that this is the letter that is included on the IPC website for the Brechfa Forest West Windfarm Examination.

As confirmed at the Hearing these requirements (Appendix A) have been rewritten to be more appropriate to be used as planning conditions and to clarify the detail needed in each area as this has not been provided to the Welsh Government (Transport) in advance of this Examination into the Application for the proposed Windfarm at Brechfa Forest West.

The information in Appendix A is written to cover the Highways issues for both the Trunk Roads and Local Authority Roads, but is not intended to preclude any additional requirements of the Local Authority's Highways Officer and should be read at all times in conjunction with their requirements.

The Applicants reference within the TMP to Welsh Government (Transport) draft unpublished documents have been removed for the avoidance of confusion and to ensure that the planning conditions are reasonable, precise and enforceable.

I would draw your attention to the TMP requirements which refer to the assessment of the Abnormal Indivisible Load (AIL) traffic movements both into and out of the site. This would ensure that any equipment brought to the site can also be safely moved off site should replacement be needed under maintenance requirements or long term decommissioning. The need for the information in reverse becomes more prevalent following the Applicants definitions of 'maintain' and 'maintenance' which would not limit the number of AIL movements into and out of the site once the development project becomes operational.

**b) Development Consent Order Schedule 1 Part 3 Paragraph 8, 11 and 12**

Throughout these three paragraphs reference is made to the 'relevant planning authority' which the Applicant has defined in the DCO as 'Carmarthenshire County Council'. As stated at the Hearing on 12<sup>th</sup> July 2012 this is not acceptable to the Welsh Government (Transport) as it will be necessary for the Applicant to seek approval from the Welsh Government (Transport) to move the AIL on the Trunk Roads. As previously stated the Applicant cannot simply rely on the 'relevant planning authority' communicating with the

Welsh Government as the Trunk Roads concerned may not be within the 'relevant planning authority' boundary and Carmarthenshire County Council would therefore have no remit or requirement to consider these roads.

The Applicant stated during the Hearing that the reason for the omission of the Welsh Government from these paragraphs was due to the fact that there would be no impact or highway improvement/mitigation changes on the Trunk Roads. It was necessary to point out to the Applicant that no definitive information had been provided on the routes to be used and that therefore the Welsh Government (Transport) were unable to comment on the Applicant assertion that there would be no impact on the Trunk Roads.

The Welsh Government (Transport) reiterated that the information requested for inclusion in the TMP would be required before the Welsh Government (Transport) would be able to determine the impact on the Trunk Road Network. It is understood that the Applicant has not yet fixed the points of entry on to the Trunk Road Network for the AIL. From the Applicant's documentation it would appear that AIL could be starting from Swansea, Cardiff and/or Chepstow and therefore at present all of these routes would need to be assessed within the TMP.

### **c) Development Consent Schedule 1 Part 3 Paragraph 14**

In response to the Planning Inspector's request to elaborate on the 'not less than 72 hours' in respect to notice of changes to the AIL movements.

The Welsh Government (Transport) raised concern over the 72 hours as it is unlikely to be achievable for the AIL movements on Trunk Roads due to the need to ensure that the appropriate permissions, Temporary Traffic Management Orders (TTRO) and Road Space Booking Forms are agreed, approved and in place.

Should the Applicant need to apply for Temporary Traffic Management Orders (TTRO) it would take at least 12 weeks to complete their publication and public notice period. TTRO would normally cover the whole period of the movement of the AIL, so unless there was a significant change/slippage in the proposed delivery schedule of the turbine components it is unlikely that the TTRO would be affected. However, the Road Space Booking requirements for the Trunk Roads would need to be addressed more frequently. Alterations to the Road Space Booking requests can be made up to the week before the planned movement date.

Therefore, the Welsh Government (Transport) would suggest that the 'at least 72 hours notice' is replaced with 'at least 7 working days notice' to ensure that the condition is one that can be achieved within the state timescale.

## Appendix A

### **Wording for the condition or requirement for a Construction Traffic Management Plan**



Llywodraeth Cymru  
Welsh Government

No development other than felling shall commence until a Construction Traffic Management Plan (TMP) has been submitted to and approved by both the Local Planning Authority and Welsh Government Transport, the Highway Authority for the Trunk Road Network (TRN) in Wales. The TMP shall detail the proposals for the movement of construction traffic and Abnormal Indivisible Loads (AIL) associated with wind farm development and shall include the following:

(a) Construction vehicle routeing plans at 1:2,500 scale for all traffic including AIL showing swept path analysis from the point of entry onto the highway network to the site; and in reverse for decommissioning.

(b) Construction vehicle routeing plans at 1: 2,500 scale for all traffic including AIL showing highway mitigation required and land ownership boundaries including identified holding areas, passing areas and layover areas. Any highway mitigation shall include supporting HD19/03 Safety Audit documentation.

(c) No development shall commence until the land required for highway mitigation and holding areas has been acquired or made available for use.

(d) Site access highway design plans at 1: 2,500 scale that shall include supporting HD19/03 Safety Audit documentation.

(e) Detailed schedules of the management of junctions to and crossings of the public highway and other public rights of way during delivery of AIL, construction materials and other operating equipment.

(f) The provision of delivery schedules detailing the time and date of movements, nature of delivery vehicles: particularly details of AIL detailing vehicle parameters, gross vehicle weight, number of vehicles in convoy size, dimensions (width, length, height) and weight (total vehicle with load and axel loading).

(g) Details of AIL escorts highlighting where and when along the route private vehicles, banksman and Police vehicles escorts will be used.

(h) Provision of plan drawings and associated traffic signs schedule highlighting locations along the route where temporary traffic management (cones, temporary signs, etc.) needs to be deployed.

(i) An agreed impact assessment of AIL on all highway structures on the affected route, including bridges, culverts, retaining walls, embankments, drainage features, and third party buildings and structures shall be included in the TMP.

(j) The making good of any incidental damage done by construction traffic associated with the proposed development to the trunk road and county road network including street furniture, structures, drainage features, highway verges and carriageway surfaces.

(k) Documented trial runs with supporting videoed evidence shall be included in the TMP demonstrating the suitability of the entire transport route from point of entry onto the highway network to the site for all AIL and in reverse for the decommissioning of the windfarm.

(l) The development shall be carried out in accordance with the approved TMP.

The applicant should consult with the Trunk Road Agent so that constraints on vehicle movements such as, embargo periods, route traffic sensitivity, temporary roadworks and other highway restrictions are included in the TMP.

If deemed necessary by the Police or relevant Highway Authority, Temporary Traffic Regulation Orders (TTRO) shall be required to facilitate the movement of AIL. The Highway Authority for County Roads is the local Authority and for the TRN the Welsh Government is the Highway Authority. TTRO approval of applications on TRN take up to 12 weeks.

A Road Space Booking application shall be completed in advance of any TRN movements, are available from the relevant Trunk Road Agent and shall be completed by the applicant.

#### Definitions

- Swept path analysis – the calculation and analysis of the movement and path of different parts of a vehicle when that vehicle is undertaking a turning manoeuvre. At a basic level this includes calculating the path taken by each wheel during the turn and also calculating the space needed by the vehicle body during the turn.
- HD 19/03 Road Safety Audit – Highways Directive for the mandatory requirement for Road Safety Audits on all trunk roads. It is contained within the Design Manual for Roads and Bridges Volume 5 Section 2 Part 2.