

The Proposed Longfield Solar Farm Order National Highways Written Representations

Planning Act 2008
Infrastructure Planning (Examination Procedure) Rules 2010

August 2022

1. Introduction

- 1.1 National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
- 1.2 National Highways seeks to submit these written representations in the context of the proposed Nationally Significant Infrastructure Project (NSIP) and application for a Development Consent Order (DCO) to provide a solar farm with energy storage at Longfield Solar Farm (Proposed Development) by Longfield Solar Energy Farm Limited (the Applicant).
- 1.3 The Applicant seeks to promote the Proposed Development to provide solar farm with energy storage which will generate and store renewable electricity for export to the National Grid.
- 1.4 In the vicinity of the Proposed Development, the SRN comprises the A12 Strategic Road Network (SRN), particularly junction A12 junction 19.
- 1.5 National Highways operates under a License granted by the Secretary of State for Transport which is available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431389/strategic-highways-licence.pdf
- 1.6 In conformity with Section 5.29 of our License, National Highways is directed by the Secretary of State to have due regard to relevant Government policy. Of particular relevance to the proposed development is Department for Transport Circular 02/2013 “The Strategic Road Network and The Delivery of Sustainable Development”:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/237412/dft-circular-strategic-road.pdf

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1.7 National Highways would prefer to receive communications electronically.

2. Summary Position

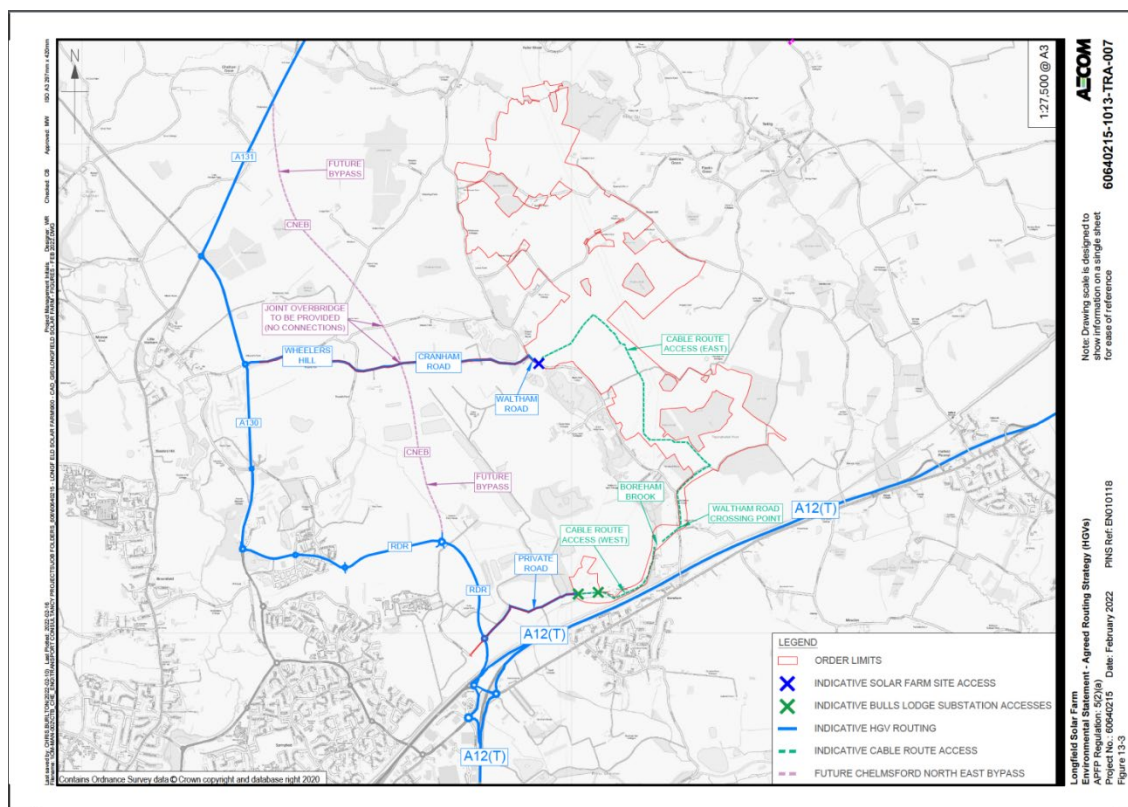
This written representations are National Highways formal recommendations with regards to the Development Consent Order (DCO) submission in relation to the Proposed Development. The DCO sets out a list of consents being sought by the Applicant. Those relevant to National Highways include Framework Construction Traffic Management Plan (CTMP), Outline Construction Environmental Management Plan (CEMP), Environmental Statement (ES) Chapter 13: Transport and Access and ES Appendices 13A and 13B.

- 2.1 The written representations are National Highways formal recommendations with regards to the DCO submission in relation to the Proposed Development. The DCO sets out a list of consents being sought by the Applicant. Those application documents relevant to National Highways include Framework Construction Traffic Management Plan (CTMP), Outline Construction Environmental Management Plan (CEMP), Environmental Statement (ES) Chapter 13: Transport and Access and ES Appendices 13A and 13B.
- 2.2 For the purposes of clarity, National Highways interests relate solely to the construction phase of the Proposed Development. Having reviewed the DCO documentation, we are satisfied that there are no significant adverse transport implications for the SRN once construction is complete and the scheme is operational.
- 2.3 National Highways concerns regarding the construction phase relate to the interaction of the Proposed Development with the proposed A12 Chelmsford to A120 Widening Scheme (A12 Scheme), preparing for a Summer 2022 submission. National Highways and the Applicant have identified a number of areas from ongoing discussions with the Applicant and associated DCO documentation which remain to require clarification and agreement between parties. The Statement of Common Ground (SoCG) submitted in the context of the application for the DCO application identifies those issues which remain under discussion. The matters on which National Highways requires further information and/or clarification are set out below in each relevant section and listed in full at the end of the document.
- 2.4 National Highways may seek requirement(s) to be imposed by the DCO to manage the impact of the construction phase, particularly relating to A12 Scheme use of the private road from the Radial Distributor Road (RDR) for construction.

3. Strategic Road Network (SRN)

3.1 The Proposed Development is parallel to the A12 between junction 19 and junction 20a. The closest point the scheme comes to the A12 is some 30m to the north of the A12. It is proposed within LSF’s DCO that during construction the main access route to the site will be Waltham Road via Cranham Road, though other access routes will be used to access Bulls Lodge Substation via Boreham Junction/RDR.

Plate 1: LSF Order Limits in context to SRN



4. Pre-application Consultation

- 4.1 Early discussions began in January 2021 with the Applicant to gain an understanding on the access strategy and routing strategy and begin initial scoping discussions for the Transport Assessment (TA) and Outline CTMP in relation to the DCO and the A12 Scheme.
- 4.2 Continuous meetings have since occurred between National Highways and the Applicant to discuss potential cumulative impacts, construction traffic management, SRN impact and capacity assessment and SoCG.

5. Statement of Common Ground

5.1 National Highways are working with the Longfield Solar Energy Farm Ltd to progress a SoCG, which will be submitted to the Planning Inspectorate at

Examination Deadline 1B. The SoCG will cover areas of assessment that remain to be agreed and accepted, notably those concerning the construction phase and any necessary requirements.

6. National Highways' concerns

6.1 The TA for LSF has been produced by AECOM on behalf of Longfield Solar Energy Farm Ltd, dated February 2022. It can be found Environmental Statement, Appendix 13A: Transport Assessment.

6.2 The TA presents an assessment of the transport impacts of the Proposed Development during construction, operation and decommissioning phases.

Private Road

6.3 The strategic highway impacts during LSF construction, are reported in Environmental Statement, Chapter 13: Transport and Access and the Framework CTMP.

6.4 As mentioned in the Framework CTMP and shown in 'Appendix B – Surrounding Highway Network', LSF proposes to utilise a private road via Boreham Interchange/RDR for Bulls Lodge Substation compound and construction. Plate 2 shows the location and extent of the private road in question.

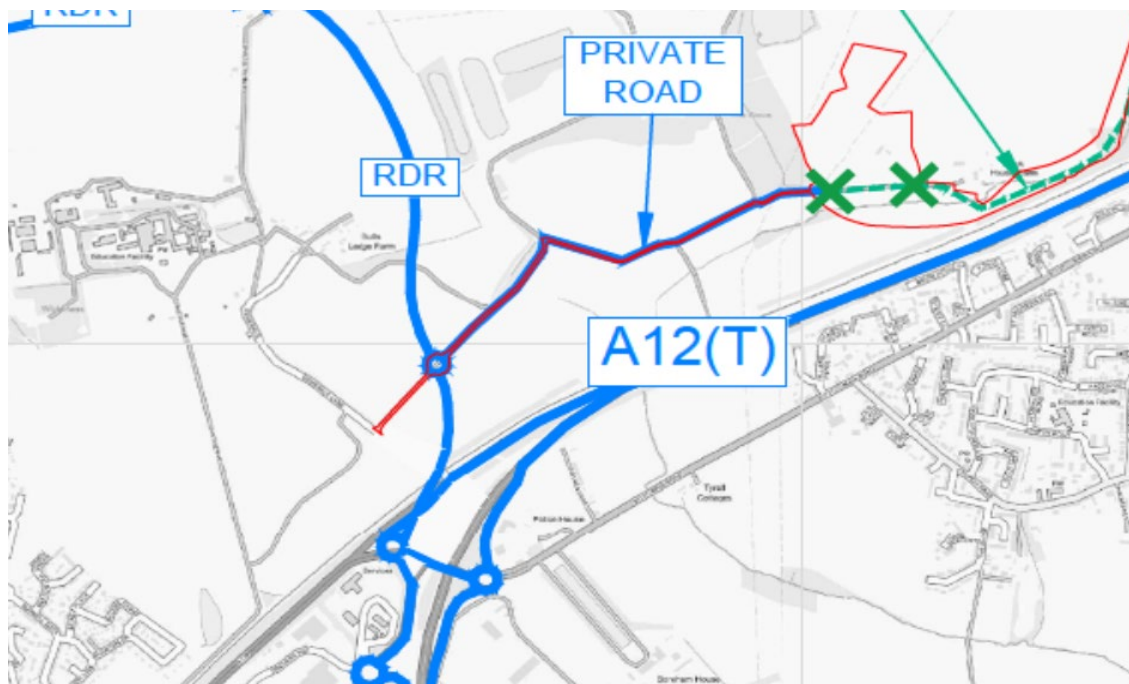
6.5 The A12 Scheme also proposes to utilise this private road's access for construction purposes including but limited to:

- Haul route.
- Satellite Construction Compound.
- Construction of Paynes Lane Bridge.
- Materials delivery.

6.6 Construction traffic movements expected at the private road are detailed in 6.13-6.14.

National Highways require to understand how the maintenance and liability for the use of this private road will be apportioned and agreed between the parties.

Plate 2: Private Road



Boreham Interchange

6.7 Paragraph 5.4 of LSF Framework CTMP states there is expected to be no daytime closures at Boreham Interchange during the A12 Scheme construction, which National Highways can confirm is correct for Monday to Friday, only with weekend closures occurring.

6.8 The A12 Scheme will require narrow lane running through this section to create the necessary working space. Single carriageway night-time or weekend closures will be required to install and remove the narrow lane running. Installation of beams and temporary works to widen the bridge will require infrequent off-peak total closures. Further phased restrictions will be required on the junction 19 slip roads, including lane and full closures. Some construction activities will require a directional closure or total closure of Boreham Bridge.

6.9 The narrowing of lanes may have an impact on the Proposed Development at LSF HGV movements, particularly abnormal loads. As mentioned in the relevant representation submitted June 2022, National Highways suggest the Applicant should be reflect on Boreham Interchange highway constraints within the detailed CTMP.

6.10 Payne's Lane Bridge will require full carriageway closures of the A12, A138 slip road and junction 19 northbound entry slip for construction activities such as installation of the bridge spans. Subject to the details that will be identified during the detailed design, it may be that these highway closures need to be coordinated with the closure of the Great Eastern Main Line (GEML). In such circumstances, particular care will be needed to

ensure diversion routes for the highway and replacement rail services are coordinated, if required.

- 6.11 Traffic would be diverted onto a temporary junction 19 northbound on-slip from the junction 19 northern roundabout to minimise disruption whilst constructing a retaining wall between the A12 and the adjacent railway. This will require closure of the A138 slip road and the junction 19 northbound entry slip. This closure will enable more of the works to be carried out during daytime hours, facilitating the works and reducing the nuisance. However, to create additional working space and off-peak lane restrictions will be required on the A12.

Construction Programme

- 6.12 As mentioned in the TA, LSF construction period is 2024-2026, peak construction in 2025. The A12 Scheme construction programme and peak construction of 2025 mirrors that of the Applicant. It is noted within 3.5 of the Framework CTMP, that the A12 Scheme’s construction will begin in 2025, however it is 2024-2027.

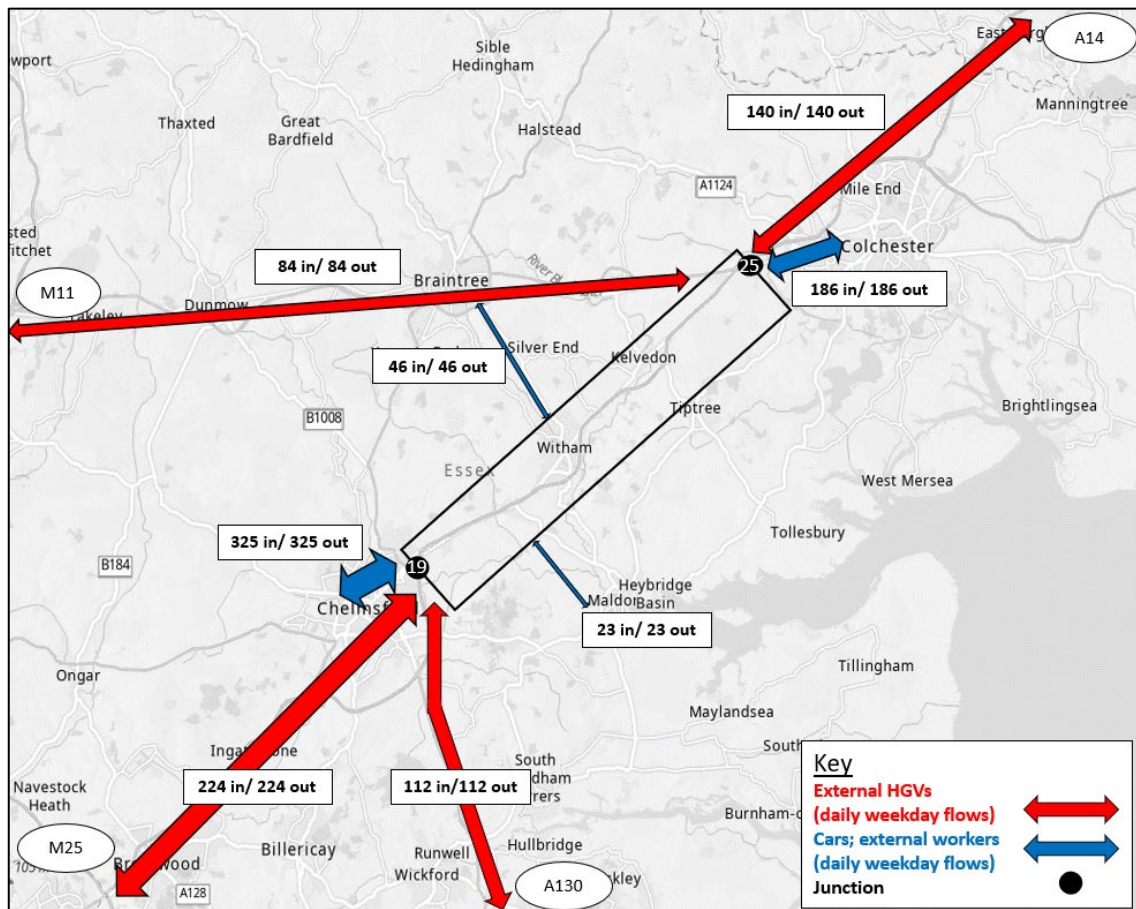
Construction traffic movements

- 6.13 The Applicant will utilise Boreham Interchange, which at the time of their construction will be the responsibility of National Highways. There is a proposed movement total of 84 HGVs and 123 cars/ LGVs arriving and departing at the Boreham Interchange per day at 2025 peak construction, equating to a total of 207 vehicles (414 two-way movements) per day.
- 6.14 The A12 Scheme's construction traffic movements at Boreham Interchange are shown in Table 1 and scheme wide movements displayed on Plate 2. Due to the construction programme, the A12 Scheme’s peak traffic at Boreham Interchange will be at the start of the programme (2024-2025) for the construction of Payne’s Lane Bridge. This mirrors the applicants peak construction of 2025.

Table 1: HGV Construction traffic movement at Boreham Interchange

Approach	Weekday		Saturday	
	In	Out	In	Out
A12 between the M25 and A12 19	224	224	104	104
A130 between the Port of Tilbury and A12 J19	112	112	52	52

Plate 3: A12 scheme wide construction traffic movement



6.15 The Applicant has estimated 46 HGVs per day and 48 LGVs/ cars per day (during peak construction phase) utilising the private road. The A12 Scheme will detail construction traffic movements on the private road as the design develops. However, the project does not foresee having vast amount of construction traffic movement using the private road due to this route being required only for Paynes Land Bridge construction and potentially material deliveries.

7. Key concerns

7.1 It is noted within the Framework CTMP (paragraph 7.3.5) the Applicant proposes to provide road safety measures including signage and banksmen who will increase awareness of construction activity. However there remains uncertainty with regards to which entity will act as Principal Contractor and therefore leaving ambiguity relating to what highway rules and requirements are to be complied with and plans relating to maintenance and liability.

7.2 There is a need for agreement to be sought prior the Applicant's DCO decision to ensure appropriate maintenance and liability responsibilities in relation to the impact of the use of the private road for the construction of the Proposed Development and the A12 Scheme are in place prior to any

construction programme beginning.

7.3 Additionally, National Highways are seeking to ensure access is retained from the RDR/private road to A12 site for construction purposes. National Highways will seek to implement this as a requirement within LSF DCO if necessary.

7.4 Effort is being made between both parties to ensure the private road is shared between both schemes, working together to agree and establish this in the SoCG.

8. Other matters

Operational Traffic Impact

8.1 The strategic highway impacts once the LSF is operational, are reported in Environmental Statement, Chapter 13A: TA, chapter 6. Proposed Trip Attraction and Distribution.

8.2 The TA states that at Boreham Interchange a maximum of eight vehicles (or 16 daily two-way vehicle trips) are expected daily. This number of trip will be negligible on the SRN and therefore National Highways have no comment at this time.

Decommissioning Traffic Impact

8.3 The strategic highway impacts once the scheme is at the decommissioning phase, are reported in Environmental Statement, Chapter 13: Transport and Access.

8.4 LSF documents state that the decommissioning assessment year is assumed to be no earlier than 2066 and is expected to be similar in duration and nature to the construction phase, albeit slightly shorter in duration and with fewer vehicle trips.

8.5 Therefore National Highways have no comment at this time.

9. Summary and Further Information Required

9.1 National Highways are in support of the LSF application subject to agreement on the use of the private road via Boreham Interchange/RDR and clarification on the Principal Contactor, conversations for which are ongoing.

9.2 It is noted by National Highways that a separate CTMP has been prepared in relation to the A12 Scheme. In addition, A12 Scheme Outline CMTP is now available for the Applicant to view on PINS website.

9.3 The parties are currently working towards agreeing a SoCG.