



Staffordshire County Council

WMI Written Representation

Staffordshire County Council has been in consultation with Oaklands Solar Farm over the proposed scheme during the pre-application period and have identified that the primary matter of interest/concern for Staffordshire relate to the impacts of construction traffic for the development on the Staffordshire road network.

We have maintained throughout the pre-application stage that although the impacts of the proposal on Staffordshire are temporary in nature they should be clearly understood, minimised and mitigated.

To assist the Examination presented below are details of areas of concern and/or matters outstanding for the County Council.

1. Walton Bypass

- 1.1. Early in the Pre-app process it was expected that the Walton Bypass would be in situ for the anticipated commencement date of the solar farm. However, the proposed road is to be constructed by a private developer and has been beset by delay. Both DCC and SCC are working with the developer's consultant to agree and approve the detailed design of the bypass. However, there is still much design work required to enable a full technical approval to be provided. In terms of timescales, it's difficult to predict and provide guarantee however with a fair wind and all parties engaged, hopefully by early 2026 the bypass should be open.
- 1.2. Recognising the issues with the bypass Oaklands Solar sought to consider alternative options in case the bypass was not available.
- 1.3. Whilst there is no guarantee over the timeframe for completion of the bypass it is still the preferred route of choice for construction traffic and we would want the DCO to include provisions to ensure it becomes the primary construction traffic route when opened.

2. Construction traffic routing

- 2.1. As stated above our preference would be for construction traffic to route via the Walton Bypass. However, recognising the uncertainty around its completion date the developer has had to consider alternatives 2A and 2B.
- 2.2. It is unclear from the assessment undertaken in the Environmental Statement (ES) chapter 10 why routes 2A and 2B could not be used in conjunction with one another to spread the impacts of construction traffic across the network rather than focussing it on a particular route. We would suggest therefore that the Outline Construction Traffic Management Plan (OCTMP) is updated to include provision for a review of construction routes, once the location of materials being transported to site is known, and agreement sought from highway authorities over the construction traffic routes to be used.
- 2.3. In relation to impacts of Route 6 on Staffordshire the ES does not include any reference to several schools¹ that are in close proximity to the proposed construction traffic route. Therefore, it gives no consideration to the movement of young pedestrians who potentially will need to cross and/or walk along the construction traffic route on their way to/from school. The OCTMP sets out provision for restricting movements during network peak hours so will include the morning school run. However, mitigation for the afternoon school day end presently is not provided. We therefore request the OCTMP is amended to provide restriction on movement of HGVs on Route 6 during the afternoon school run period. This will only need to be in place during term time.
- 2.4. It is unclear from the ES what consideration has been given to the on-going construction of the Drakelow Park development and whether this has been accounted for in the impacts of construction traffic.
- 2.5. As construction traffic Route 6 enters Derbyshire there is a narrow bridge on Rosliston Road over the railway. It is not clear whether any assessment has been made of this bridge or if any provisions are required to avoid conflict between vehicles. As the bridge is within Derbyshire, we leave the matter to their discretion but would wish to know whether any mitigation, such as shuttle working, would cause delay within Staffordshire.

¹ Paulet High, Blessed Robert Sutton Catholic High school, Edge Hill Primary, Violet Way Academy, Riverview Primary

- 2.6. It is noted that the ES only considers the impact of construction traffic utilising the prescribed construction traffic routes. There is no consideration of impact on routes that potentially could be used by HGV drivers if they encounter delay or obstruction on the prescribed routes. For example the B5018 through Branston could be used to avoid central Burton. The B5018 has a primary school and high school fronting directly onto it and a narrow bridge over the railway with heavy pedestrian movements. Use of this or other routes has not been assessed and therefore should not be used. This is referred to in more detail below in relation to amendments to the OCTMP.
- 2.7. The proposed routeing for the Abnormal Loads (M42, J11 then via A444) is sensible as it removes them from the heart of Burton Town Centre

3. Outline Construction Traffic Management Plan

- 3.1. The OCTMP sets out the principal mitigation measures for construction traffic.
- 3.2. Limits on movement during network peak hours are supported and deemed necessary to avoid increasing delay and congestion during construction.
- 3.3. It has been recognised that there are two significant visitor attractions in relatively close proximity to the development. For Staffordshire this is the National Memorial Arboretum (NMA). The OCTMP proposes potential construction traffic 'blackout days' during times when significant events are to take place e.g. Remembrance Day. It is suggested that more clarity is provided in the OCTMP in relation to engagement with operators of the NMA to ensure that construction traffic does not impact on events of significance and these measures are subsequently conveyed to the relevant local highway authority.
- 3.4. The OCTMP proposes to undertake condition surveys of the road pre and post construction and remedy any damage caused and attributable to the solar farm development. This is supported however the mechanism and powers for this provision are unclear. Should it be the case that there is a need for works to repair damage it is not clear whether the DCO contains relevant powers for these works to be undertaken by the developer and also whether there are respective powers for the local highway authority to agree the detail

of the works and approve the workmanship of any work undertaken. The OCTMP should also include provision for recouping of any costs incurred by the local highway authority in undertaking emergency repair work of damage caused by construction traffic.

- 3.5. As noted in the earlier section the ES did not consider impact of construction traffic on the movement of children attending schools in the vicinity of Route 6 as it passes through Burton and Stapenhill. The OCTMP therefore should be updated such that it restricts the movement of HGV traffic on route 6 during the afternoon school run and confirms the proposed restrictions during network peak hours coincide with the morning school start times. The precise timings should be set out in the final CTMP following confirmation from the schools in question of the timing of the end of their school day. This provision would only need to be in place during term time.
- 3.6. As the ES has not considered impacts on routes outside of the prescribed construction traffic routes it is essential that the OCTMP and CTMP include such measures to prevent use of 'other' routes not assessed. The OCTMP and CTMP therefore need to set out clearly that the routes assessed in the ES are the only routes to be used and the measures in place to inform HGV drivers, suppliers and contractors of such. To support this the OCTMP and CTMP need to include sanctions and remedial measures to deal with any breaches. Such sanctions and remedies need to be sufficiently robust to act as a suitable deterrent from use of non-approved routes.
- 3.7. We are also mindful that the A38 can be subject to delay and/or closure in the event of incident. We therefore seek to ensure the OCTMP and CTMP are clear that HGV traffic should stick to the prescribed routes and not divert off the A38 to avoid sections with delay i.e. construction traffic simply wait it out with remedial measures/sanctions discussed above coming into effect if drivers choose to do otherwise. The only exception to this would be instances where all traffic is diverted off the A38 by the police, in which case their instructions should be followed.
- 3.8. As noted above it is not clear what consideration has been given to the ongoing construction of Drakelow Park. It is therefore requested that the OCTMP and CTMP include provision for liaison with the Drakelow Park developers to understand construction movements and ensure there is no conflict.