

Stonestreet Green Solar

Environmental Statement

Volume 4: Appendices

Chapter 13: Traffic and Access

Appendix 13.1: Transport Planning Policy

PINS Ref: EN010135

Doc Ref. 5.4

Version 1

June 2024

APFP Regulation 5(2)(a)

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Table of Contents

1.1	Introduction	2
1.2	National Planning Policy	2
1.3	Local Planning Policy	5

Appendix 13.1: Transport Planning Policy

1.1 Introduction

- 1.1.1 The Project will be determined pursuant to section 104 of the PA 2008. On 17 January 2024, the Overarching National Policy Statement for Energy ('NPS EN-1')¹, the National Policy Statement for Renewable Energy Infrastructure ('NPS EN-3')² and the National Policy Statement for Electricity Networks Infrastructure ('NPS EN-5')³ came into force. These are the relevant National Policy Statements that have effect for the Application.
- 1.1.2 While the primary basis for making decisions on applications for development consent is the relevant National Policy Statements, other matters which the SoS may consider to be important and relevant in decision making include the development plan policies of the "Host" local authorities.
- 1.1.3 NPS EN-1 states in paragraph 4.1.12 that *"Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework"*. However, it must also be noted that paragraph 4.1.15 states that *"In the event of a conflict between these documents and an NPS, the NPS prevails for the purposes of Secretary of State decision making given the national significance of the infrastructure"*.
- 1.1.4 The following sections provide a summary of key transport and access planning policy for the Project, including:
- NPS EN-1;
 - NPS EN-3;
 - National Planning Policy Framework ('NPPF', 2023)⁴; and
 - Ashford Borough Local Plan (2019)⁵.

1.1.5 NPS EN-5 does not include any specific policies relevant to traffic and transport.

1.1.6 These policies should be considered in accordance with the above hierarchy.

1.2 National Planning Policy

Overarching National Policy Statement for Energy (EN-1)

1.2.1 Section 5.14 of the NPS EN-1 relates to traffic and transport. Paragraphs 5.14.1 – 5.14.3 state that,

"The transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through

increased congestion. Impacts may include economic, social and environmental effects.

Environmental impacts may result particularly from trips generated on roads which may increase noise and air pollution as well as greenhouse gas emissions.

Disturbance caused by traffic and abnormal loads generated during the construction phase will depend on the scale and type of the proposal.”

1.2.2 For the Applicant’s assessment, paragraph 5.14.5 – 5.14.8 of NPS EN-1 state that,

“If a project is likely to have significant transport implications, the applicant’s ES (see Section 4.3) should include a transport appraisal. The DfT’s Transport Analysis Guidance (TAG) and Welsh Governments WeTAG provides guidance on modelling and assessing the impacts of transport schemes.

National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.

The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to:

- *reduce the need for parking associated with the proposal*
- *contribute to decarbonisation of the transport network*
- *improve user travel options by offering genuine modal choice*

The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).”

1.2.3 With regards to decisions, paragraph 5.14.21 NPS EN-1 states that,

“The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.”

Overarching National Policy Statement for Energy (EN-3)

1.2.4 Paragraphs 2.10.120 – 2.10.126 of NPS EN-3 relate to construction stage traffic and transport impacts in relation to solar photovoltaic developments. Paragraph 2.10.21 states,

“Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy infrastructure but may be more voluminous.”

- 1.2.5 For the Applicant’s assessment, paragraphs 2.10.123 to 2.10.126 of NPS EN-3 state that,

“Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate.

Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.

Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.

Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.

- 1.2.6 In terms of mitigation, NPS EN-3 sets out the following points:

“2.10.139 In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period during its construction and, possibly, on the routing of such movements particularly by heavy vehicles.”

“2.10.141 Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.”

“2.10.143 Once consent for a scheme has been granted, applicants should liaise with the relevant local highway authority (or other coordinating body) regarding the start of construction and the broad timing of deliveries. Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges.”

- 1.2.7 With regards to decisions, NPS EN-3 states that:

“2.10.161 Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.”

“2.10.162 The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.”

National Planning Policy Framework

1.2.8 Paragraph 114 of the NPPF states: *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

1.2.9 Paragraph 115 of the NPPF states 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.”*

1.2.10 Paragraph 117 of the NPPF states: *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”*

1.3 Local Planning Policy

1.3.1 The following Ashford Borough Council (‘ABC’) Local Plan policies are relevant to the Project:

Policy TRA7 – The Road Network and Development

“Developments that would generate significant traffic movements must be well related to the primary and secondary road network. New accesses and intensified use of existing accesses onto the road network will not be permitted if a clear risk of road traffic accidents or significant traffic delays would be likely to result. Proposals which would generate levels and types of traffic movements, including heavy goods

vehicle traffic, beyond that which local roads could reasonably accommodate in terms of capacity and road safety will not be permitted. Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts. In some cases, this may require exploring the delivery of mitigation measures prior to the occupation of a development. Consideration of mitigation and impact will be assessed through the fulfilment of the requirements of Policy TRA8”

Policy TRA8 – Travel Plans, Assessments and Statements

“Planning applications will be supported by either a Transport Statement, or a Transport Assessment depending on the nature and scale of the proposal and the level of significant transport movements generated. Where appropriate, the Council will liaise with the relevant authority in relation to what sort of evidence is required. The recommendations of these studies, including Travel Plans, will be required to be delivered prior to or as part of the development and will be secured through condition or S106 agreement.”

References

¹ Department of Energy Security & Net Zero (2023). Overarching National Policy Statement for Energy (EN-1). Accessed January 2024.

<https://assets.publishing.service.gov.uk/media/65a7864e96a5ec0013731a93/overarching-nps-for-energy-en1.pdf>

² Department of Energy Security & Net Zero (2023). National Policy Statement for Renewable Energy Infrastructure (EN-3). Accessed January 2024.

<https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf>

³ Department of Energy Security & Net Zero (2023). National Policy Statement for Renewable Energy Infrastructure (EN-5). Accessed January 2024.

https://assets.publishing.service.gov.uk/media/64252f852fa848000cec0f53/NPS_EN-5.pdf

⁴ Department for Levelling Up, Housing & Communities (2023) National Planning Policy Framework. Accessed January 2024

https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

⁵ Ashford Borough Council (2019). Ashford Local Plan 2030. Accessed on 7 August 2023:

<https://www.ashford.gov.uk/media/jw3nbvq1/adopted-ashford-local-plan-2030.pdf>