



## National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Andrew Jinks (Regional Director)  
Operations Directorate  
Midlands Region  
National Highways

To: **Staffordshire Moorlands District Council – FAO:** Declan Cleary

CC:

**Council's Reference:** SMD/2023/0594

**Location:** Land at Blythe House Farm, south of the A50, Draycott in the Moors, ST10 4JN

**Proposal:** Installation of a solar array, substation and associated works forming an extension to Blythe Solar Farm

**National Highways Ref:** NH/23/04094

Referring to the consultation on planning application SMD/2023/0594 referenced above, in the vicinity of the A50 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to .

|                                                                                         |                                            |
|-----------------------------------------------------------------------------------------|--------------------------------------------|
| <b>Signature:</b>                                                                       | <b>Date: 27 December 2023</b>              |
| <b>Name:</b> David Pyner                                                                | <b>Position:</b> Assistant Spatial Planner |
| <b>National Highways</b><br>The Cube, 199 Wharfside Street, Birmingham, B1 1RN<br><hr/> |                                            |

## **Annex A**     **National Highways' assessment of the proposed development**

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.

### **Recommended Non-Approval**

The Proposed Development will consist of the construction of ground-based PV panels mounted on metal frames, transformer, storage containers, fencing, CCTV cameras, access gates, access tracks and all ancillary grid infrastructure and associated works.

The site is located on land immediately to the southwest of the A50 which forms part of the SRN. Vehicular access to the site will remain via existing roads from Draycott Road via an unnamed local road, with the closest point of access to the A50 located approximately 4km travel distance northwest at the A50 / A521 Tean roundabout.

We have reviewed the Glint and Glare Assessment submitted by Neo Environmental Ltd on behalf of the applicant, Innova Renewables Developments Limited, dated 23 October 2023.

Based on our review, we have the following comments to make regarding the report and its appendices:

### **General comments**

1. The quantity of road and rail receptors is not clear from the executive summary, 34 road receptors and 17 rail receptors are identified in a way similar to dwellings. This does not clearly align to the body of the report which assesses 2 roads and 1 rail line. We request that this is clarified.
2. Check for grammar and typos, i.e. 4.26 definition of low.
3. Definitions provided for glint and glare within the scope of the report via BRE do not align to the more standard definitions used by the FAA, where both glint and glare are reflected sunlight with glint being a momentary flash and glare being a continuous source of bright light and the definitions used within the section Definitions. We request that this is clarified.

### **Modelling and Analysis**

1. Modelling and analysis are undertaken with panel materials assumed to have a particular ARC as an industry standard. While not materially affecting the analysis, it needs to be clear that the final panel selection and installation will need to be equal to or improved to this specification to ensure effects are consistent with those reported.

2. The methodology describing the interpretation of green glare in para 4.13 is mixed in presentation between residential and aviation receptors.
  - a. There is no commentary of the predicted impact of green glare to road or rail receptors. We request that this be clarified
3. Magnitude of Impact does not contain consideration for red glare ratings and sets out magnitude of high for yellow glare.
  - a. Please clarify what red glare would be rated at.
  - b. Please clarify what magnitude, if any, would be considered to result in a medium category.
4. Findings and recommendations are based on a worst case tilt angle for all receptors that is generally at 25 degrees. Please advise as to whether a 20 degree tilt would have similar results or require less mitigation.

### **Appendices**

1. Appendix B - G – labelling shown on associated mapping only goes to 9. It would be useful if other measurement points were identified in the image and a reference provided to corresponding figures.
2. Appendix A Figure 4 site layout and Appendix 7H showing array areas do not appear to clearly match in scale/scope.
  - a. Appendix A has a significantly reduced area shown as being included as part of the application area from the extent of arrays shown in Appendix 7H and graphics within the main body of the report. We request that this is clarified.

### **Mitigation**

1. We understand that as a whole, the identified impacts can be managed through mitigation which is proposed to incorporate additional landscape screening, where necessary.
  - a. The parameters of the mitigation are clearly identified to include required height and a description of locations.
  - b. The landscape and ecological layout plan (BF/613/11) identified from the planning portal does not contain the same locations for landscape as shown in Appendix A Figure 6 where new mitigation planting is needed. Locations will need to be coordinated with landscape to ensure necessary screening is provided in the right location to the correct specification.
  - c. Given the potential density of plantings along the A50, we recommend amending the mitigation strategy to include infill or new plantings between measurement points 1 and 8 as a minimum and to ensure that the final height that is maintained is at 3.5m agl or to a height above the top level of panel arrays to accommodate the potential level change in terrain along the road.

### **Summary**

We note that a detailed calculated assessment regarding the A50 has been provided within the report and we are generally content with this. Overall, we consider that the

Glint and Glare Assessment arrives at manageable impacts providing the landscape screening is retained / provided to the height and density as required (native hedgerow to be planted / infilled) at 3.5m.

Notwithstanding, following receipt of the above information including amendment to the mitigation strategy as detailed above, National Highways will be better placed to comment on the likely impacts of the Glare and Glare Assessment on the SRN in the area.

Once the above clarifications have been provided and approved, National Highways will likely recommend that any subsequent no objection response should recommend the following conditions be implemented as part of any planning approval in order to safe-guard the operation of the SRN (A50):

- The proposed mitigation strategy for the road-based receptors along the A50, in order that the landscape strategy and proposals for mitigation screening should align and be delivered; and
- An updated Construction Traffic Management Plan (CTMP) in order to manage any HGV construction traffic routing associated with the SRN.

### **Recommendation**

**Considering the above, National Highways recommend that the planning permission not be granted for a period of three months from the date of this response to allow sufficient time for the applicant to provide further information, for National Highways to review and respond to information provided.**

### **Standing advice to the local planning authority**

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.