MEMORANDUM

From:	Chief Officer, Environment & Technical	**To:**	Chief Officer Economy & Planning
		FAO::	Matthew Phillips
Our Ref:	ET/DC/MZ/P/2024/1237	**Your Ref:**	P/2024/1237
Date:	17/03/2025		

TOWN AND COUNTRY PLANNING ACT 1990

DATBLYGIAD O ARWYDDOCÂD CENEDLAETHOL AR GYFER ADEILADU, GWEITHREDU A CHYNNAL A CHADW GORSAF CYNHYRCHU TRYDAN SOLAR FFOTOFOLTÄIG, SYSTEM STORIO YNNI BATRI ("BESS"), GWRTHDROYDDION, TRAWSNEWIDWYR, CEBLAU, IS-ORSAFOEDD, TRACIAU MYNEDIAD, TIRLUNIO, ARDALOEDD GWELLA ECOLEGOL A DATBLYGIAD ATODOL CYSYLLTIEDIG/DEVELOPMENT OF NATIONAL SIGNIFIANCE FOR THE CONSTRUCTION, OPERATION AND MAINTENANCE OF A SOLAR PHOTOVOLTAIC ELECTRICITY GENERATING STATION, A BATTERY ENERGY STORAGE SYSTEM ("BESS"), INVERTERS, TRANSFORMERS, CABLING, SUBSTATIONS, ACCESS TRACKS, LANDSCAPING, ECOOGICAL ENHANCEMENT AREAS AND ASSOCIATED ANCILLARY DEVELOPMENT

LAND NORTH AND SOUTH OF, RUTHIN ROAD, COEDPOETH, WREXHAM

I refer to your consultation / email dated 03/09/2024 in respect of the above.

It is the LHA's understanding that the site comprises several agricultural fields, bound by a mixture of mature woodland trees, hedgerows, fencing, agricultural tracks and roads.

The proposal is to provide a source of homegrown renewable energy, helping to reduce carbon emissions and strengthen energy security. There are two elements to the proposals, the solar photovoltaic electricity generating station and the battery energy storage system, the latter may not be delivered.

Access Arrangements

The updated proposals indicate four different accesses to the site from the A525, three to the south of the A525 including one new proposed access and an existing agricultural access to the north of the A525.

The proposed new access is the one located to the east of the site approximately 75-100m west of the Heritage Way / A525 junction. At this point on the A525 there are no footways along the frontage and a speed limit of 50 mph in place. There are also two signs located along this frontage, a speed camera sign and a direction sign. The new access is proposed to provide access for the construction phase and then be retained as a permanent main access for maintenance. The

proposed junction arrangement has 15m radius kerbs, with a 7m wide access and no footways along the frontage.

The western access on the south side is existing and is stated as being suitable for HGV's as it is currently used by large agricultural vehicles. The current use is to serve Home Farm and a number of residential properties. This is not proposed to be used as a construction access except in the initial site establishment phase whilst the new site access is under construction. Further detail states that turning movements could be restricted and this could be laid out the construction management plan.

The third access is an existing agricultural access to the north of the A525 which is stated to be used for maintenance access when the site is operational.

The fourth access is along Rhos Berse Road, the submission states that this is not proposed to be used during construction. It is stated that it may be needed in exceptional circumstances and that it will be limited to staff or emergency vehicle access only.

The submitted information states that advance signage to will need to be put in place to warn of construction vehicle movements and potentially a temporary speed reduction on the A525 via traffic management. The applicant will need to liaise with WCBC Traffic Manager Jamie Edge to agree the required Chapter 8 and/or highway arrangements required and the implications for these.

The LHA would advise that off-peak working or constructing the new access in the summer holidays may be advisable due to the high levels of traffic that currently use the A525 at peak times and the disturbance and congestion that could result from these works. The applicant would need to enter into a Section 278 agreement for the delivery of any on-highway works.

Traffic Surveys

It is noted that traffic surveys have been undertaken as part of the works, but the LHA are concerned that the surveys were undertaken in the summer months and appear to have been undertaken partially in the school holidays due to some damage to the equipment, which would invalidate the results from a highways perspective.

Speed surveys would also only be relevant if undertaken with a substantial element of free flow traffic speeds present. The A525 suffers from high levels of congestion at peak times which substantially reduces the speed vehicles can travel at.

The A525 is a 50mph road and therefore visibility splays of 2.4m x 160m are required in either direction for the new access and any access that the use will be intensified at. The submitted plans do not appear to meet the required visibility splays as set out in the DMRB and there is concern that this could compromise highway safety.

In the appendix of the CTMP there is a safety audit where the applicant has made reference to a relaxation of two steps of the visibility requirements for 85kph within CD 109 of the Design Manual for Roads and Bridges but has not clarified on what basis they are seeking a reduction from the SSD. The LHA remains of the view that 2.4m x 160m should be provided unless updated surveys are undertaken within free flow conditions within school term time clarifying 85th percentile speeds lower than the existing speed limit.

Any signs located within the visibility splays should be re-sited.

Furthermore, the LHA notes that a Road Safety Audit has been undertaken at proposed accesses 1 and 2 and has flagged up issues with visibility splays and swept paths, the LHA would agree that these issues should be addressed and that furthermore a swept path of a low loader is shown passing over the exit lane of access 1 which is not acceptable, should there be a vehicle waiting at the stop line to exit access 1, a vehicle intending to access the road would not be able to enter, this is required to be addressed.

Swept Paths

Swept paths for a 12m rigid and a 13.5m low loader have been undertaken but these are overlaid which makes it difficult to assess. Individual swept paths should be provided for access 2.

Internal access

It is noted the existing farm tracks will be used where possible but where required there may be a need for new access tracks to be formed using a layer of permeable crushed stone.

Public Rights Of Way

The Design & Access statement details that there will be buffers to the existing and proposed to be diverted public right of way and landscaping to reduce the visual impact of the proposals.

The information submitted states that Bersham Public Footpath I runs through the southern parcel of the site and PROW 8 runs through the northern parcel of the site. It is understood that the proposed diversion is just to reflect what is actually happening on the existing PROW rather needing to change as a result of the proposals.

The submission details that there will be a requirement to divert or close footpath ESCLUSHAM/ABOVE/3 as part of the proposals temporarily.

The LHA would advise that WCBC's PROW officer Sean Hanratty should be consulted and provide approval for these works.

Trip Generation

Construction

The construction works for the Solar Farm are proposed to take place over 12-18 months and the construction works for the BESS are proposed to take place over 6-9 months. The construction hours are Monday – Friday between 7am-7pm and Saturday between 7am and 1pm. With no Sunday and bank holiday working to be undertaken.

The proposals state that there are likely to be 100 construction staff, 75 on site at any one time and that there will be a temporary construction site compound in both the north and south areas of the site accessed via the access routes outlined. The south access will also host parking for construction staff, approximately 50 spaces are proposed to be provided, based on experiences at a similar site where 1/3 of construction staff were noted to car share, evidence should be supplied to ensure that overflow parking does not result on neighbouring roads. A shuttlebus to the local train station/bus station and provision for cyclists such as secure cycle parking storage and wash and changing/drying facilities should be provided too for staff.

The construction deliveries are proposed to be 1200 HGV deliveries which in the reports submitted states that this will average 8-10 movements per day, but it is clarified that there may be some peaks and troughs expected and that at peak times 15 HGVs or 4-6 LGV's will be expected. HGV traffic is only expected during construction and decommissioning.

The applicant goes on to say that they are predicting 15 HGV (30 movements) per day and 4-6 LGV (8-12 movements) daily for the solar farm at peak times and 6 HGV's (12 movements) and 4 LGV (8 movements) for the BESS.

Operation

The proposed site is due to operate for 40 years before decommissioning and the expected operational visits are relatively low, which is standard for this type of use with approximately 10-20 vehicle visits per year. The largest vehicle would be an HGV rigid to deliver a replacement solar

panel, should there be a problem with a panel, which is anticipated no more than 3-4 times a year. The vehicles most likely to visit the site would be a four wheel drive

The operation of the site will be monitored remotely and only maintenance for solar panel cleaning and occasional visits to the substation and BESS upkeep would be required at a number of 1-2 visits per month.

Cabling works

Details of the proposed cabling works have been included within the Construction Plan. The information states that these will be laid underground via surface dug trenches approximately 1m deep and 50cm wide and backfilled. The applicant states they will utilize existing access tracks and road options wherever possible, particularly where sensitive habitats or archaeology are present.

They have stated that the preferred cable route would route along the road past Cadwgyn Hall and that where practicable the cable routes are to be installed within the fields adjacent to the roads to reduce disruption. The CMTP states that the cable route options will be shown in Appendix B, but the LHA has not been able to locate a plan that demonstrates the locations and therefore requests that a plan is submitted for review and further comment.

Construction Management Plan

The applicant will need to liaise with WCBC Traffic Manager Jamie Edge to agree the required Chapter 8 and/or highway arrangements required and the implications for these.

The LHA would advise that off-peak working or constructing the new access in the summer holidays may be advisable due to the high levels of traffic that currently use the A525 at peak times and the disturbance and congestion that could result from these works.

The delivery schedule proposed advises that deliveries will be made out of peak times due to congestion and high levels of traffic on the network.

A framework construction worker travel plan is advisable and someone to manage the document and support staff. The applicant has clarified that this will be provided and managed. The document should include details of facilities for cyclists and those that wish to walk to work or travel by public transport.

The CMP states that staff will arrive between 7 and 8am prior to the A525 peak and will leave across the afternoon out of peak hours countering the direction to the predominant traffic flow direction.

A483 SCHEME

The site includes a small section of land to the east, adjacent to the A483 which was historically included in plans for a road improvement scheme at Junction 4 of the A483 as part of the Junction 3-6 improvements that were proposed. Whilst the applicant has clarified that this scheme is no longer proposed to be funded by the Welsh Government. However, the TR11 route protection currently remains in place and the LHA is aware that WCBC are continuing to discuss the feasibility of the delivery of this scheme with the Welsh Governnment and therefore the LHA would raise concerns over proposals on any of the land reserved and needed for the delivery of this scheme.

Summary

In light of the comments above, the LHA advises that:

- Whilst the provision of a new site access is acceptable in principle, the proposed visibility splay does not meet the required standards set out in DMRB, 2.4m x 160m are required in either direction, any signage should be relocated out of the visibility splay.

- The access arrangements should be updated to address the issues raised within the stage 1 Road Safety Audit
- The surveys undertaken were partially undertaken in school holidays and therefore cannot be accepted as robust to support any relaxations from the required standards.
- The applicant will need to liase with WCBC's traffic manager Jamie Edge over the required Chapter 8 requirements and any temporary traffic regulation orders that might be required for the installation of a new access off the public highway.
- Any diversions to the Public Right Of Way will need to be discussed and arranged with the WCBC PROW officer Sean Hanratty.
- The information submitted clearly states that construction deliveries and staff travel will be kept out of peak hours which the LHA feels is essential.
- Updated swept paths are required and amendments to Access 1 to ensure large vehicles do not have to swing in to opposing lanes of traffic.
- Plans of proposed cabling routes should be submitted for further assessment.
- The construction management plan and staff travel plan will be required and to be updated to accommodate sustainable travel facilities, this should be secured by condition.
- The applicant will be required to enter into a Section 278 agreement for any works on the highway.



on behalf of Chief Officer, Environment & Technical