National Highways Planning Response (NHPR 21-09)
Formal Recommendation to an Application for Planning Permission

From: Regional Director
Operations Directorate
South East Region
National Highways
planningse@nationalhighways.co.uk.

To: Ashford Borough Council (FAO Case Officer: Alex Stafford)
planning.comments@ashford.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 22/00668/AS

Location: Land south of M20, Church Lane, Aldington, Kent

Proposal: Installation of a solar farm with a generating capacity of up to 49.9MW comprising: ground mounted solar panels; access tracks; inverter/transformers; substation; storage, spare parts and welfare cabins; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compounds; and associated infrastructure and planting scheme. *This development is subject to an Environmental Statement

National Highways Ref: 95699 #17476 #17533

Referring to the consultations on a planning application dated 29 July and 5 August 2022 referenced above, in the vicinity of the M20 at Aldington, Kent 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.[1]

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 transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: [redacted]	**Date:** 22 August 2022
Name: Kevin Bown	**Position:** Spatial Planning Manager National Highways
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

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.

Recommendation:
that conditions should be attached to any planning permission that may be granted:
Reasons:

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M20 near Aldington, Kent.

[1] Where relevant, further information will be provided within Annex A.

We acknowledge that the northern section of the site abuts the SRN, while the other two sites are also located close to the SRN.

Based the evidence presented in the submitted Glint and Glare Assessment, we are content that any SRN related distraction caused by glint or glare will be negligible.

We have reviewed the relevant Environmental Statement chapters, including the draft Construction Transport Management Plan (CTMP) and note that the close proximity of the site to the SRN raises issues in relation to boundary treatment and the construction/decommissioning phases. However we are content that these matters can be subject to appropriate planning conditions.

Having assessed application 22/00668/AS we are content that the proposals, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the SRN in the vicinity of the site (M20) provided that the following conditions are imposed.

National Highways recommends that the following conditions are implemented within any planning permission granted. As they include pre-commencement conditions, if required, we would be pleased to discuss the wording with the Council/ applicant:

1. **Condition: M20 Boundary** No part of the development hereby permitted shall commence until details of all works (structures or other engineering works, and hard and soft landscaping), within 20m of the M20 boundary have been submitted to and approved in writing by the Local Planning Authority (who shall consult National Highways). The approved boundary details shall thereafter be constructed in accordance with the approved plans and maintained in perpetuity.

   Reason: To ensure that the M20 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

2. **Condition: Construction Transport Management Plan** No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a full Construction Transport Management Plan (CTMP) have been submitted to and approved in writing by the local planning authority (who shall consult National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved CTMP unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

   Reason: To ensure that the M20 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

   Informative: The CTMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site

(including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); light management; measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

3. **Condition: Decommissioning Works** No decommissioning works shall commence on the site hereby permitted (including site clearance) until the details of a full Decommissioning Transport Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the decommissioning of the development shall proceed in strict accordance with the approved DTMP unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).

   Reason: To ensure that the M20 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

   Informative: The decommissioning DTMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all decommissioning related aspects of the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); light management; measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).