



Lime Down

Solar Park

Construction Routes in the Cotswold National Landscape Technical Note

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1 Introduction

1.1 Purpose of the Technical Note

- 1.1.1 This Technical Note (TN) has been prepared by Transport Planning Associates (TPA) on behalf of Lime Down Solar Park Limited (the 'Applicant' relating to an application (the 'Application') made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for the Lime Down Solar Park (the 'Scheme'). The Application was submitted by the Applicant on 19 September 2025 and was accepted for examination on 17 October 2025.
- 1.1.2 In response to ongoing engagement with the Cotswold National Landscape Board, this TN seeks to provide further clarity regarding the justification for selecting the proposed construction routes through the Cotswold National Landscape (CNL) to access Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor.
- 1.1.3 The proposed construction routes travel along the A46, north of the M4 motorway and then continues to the Grittleton crossroads, south of the South Wales Mainline and via the B4040 and B4039. Details of the routes are as follows and shown in **ES Volume 2, Figure 13-11: Construction Access Locations: Solar PV Sites [APP-156]** and **ES Volume 2, Figure 13-12: Construction Access Locations: Cable Route Corridor [APP-157]**:
- **Lime Down A:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Alderton Road → Fosse Way → Unnamed Road between Fosse Way and Sherston; and
 - **Lime Down B and C:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Alderton Road → Fosse Way.
 - **Cable Route Corridor Access 101 and 102:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → The Street, Grittleton;
 - **Cable Route Corridor Access 103 and 104:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Road South of Grittleton Crossroad → Neeld Court;
 - **Cable Route Corridor Access 105 and 106:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Road South of Grittleton Crossroad → Sevington; and

- **Cable Route Corridor Access 107 and 108:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Road South of Grittleton Crossroad → Cromhall Lane.

1.1.4 The TN is set out as follows:

- Section 2 explains the mitigation hierarchy and how it has been applied;
- Section 3 outlines the alternative construction routes considered, that are located outside of the Cotswold National Landscape;
- Section 4 describes how the route through the Cotswold National Landscape was selected; and,
- Section 5 sets out the conclusions of this TN.

2 Mitigation Hierarchy

- 2.1.1 As set out in Section 6.6 of **ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058]**, the Scheme has evolved in accordance with the mitigation hierarchy. The mitigation hierarchy is a sequential approach that firstly seeks to **avoid** or **prevent** an adverse effect at source and if the effect is unavoidable the provision of mitigation measures to **reduce** the significance of the effect, and lastly if the effect cannot be avoided or reduced, the implementation of measures to **offset** the effect.
- 2.1.2 Avoidance in the context of the location and routing of construction routes for the Scheme is considered as follows:
- The avoidance of sensitive receptors and locations, see Section 2.2 below; and
 - Alternative construction routes outside of the Cotswold National Landscape, which is considered at Section 3 of this TN.
- 2.1.3 It is anticipated that adverse effects may arise from the implementation of the proposed construction routes through the CNL, however, these are not significant and would be reduced by the mitigation measures summarised in Section 4.4 of this TN and set out in full in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. As the adverse effects are not significant, it is not considered that offset measures are required.

2.2 Avoidance of Sensitive Receptors/Locations

- 2.2.1 Development of construction routes for the Scheme included the consideration of the following transport factors taken from Paragraph 1.31 of Institute of Environmental Management and Assessment (IEMA) (now the Institute for Sustainability and Environmental Professionals (ISEP)) transport and access guidelines (Ref 1):
- Severance of communities;
 - Road vehicle driver and passenger delay;
 - Non-motorised user delay;
 - Non-motorised amenity;
 - Fear and intimidation on and by road users;
 - Road user and pedestrian safety; and
 - Hazardous/large load.

2.2.2 In practical terms, this meant that the Applicant avoided selecting construction routes which had all or some of the following characteristics:

- Extensive limited forward visibility;
- Accident Hotspots;
- Schools;
- Village/residential centres;
- Extensive lengths of single lane carriageway;
- The requirement for extensive highway mitigation and engineering works;
- The requirement for extensive vegetation removal; and
- Narrow or weak bridge structure.

3 Consideration of Alternative Construction Routes outside the Cotswold National Landscape

3.1 Solar PV Sites

3.1.1 The proposed construction routes to Lime Down D and E do not travel through or directly adjacent to the CNL.

3.1.2 The Applicant considered two alternative potential construction routes that would enable access to Lime Down A, B and C and which are located outside the CNL. These routes are as follows:

Norton Route

3.1.3 The Norton Route was considered in Plate 4-3 and Section 4.5 (Alternative Construction Routes) of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. A summary of the Norton Route is set out as follows:

- M4 Junction 17 → A429 → Unnamed Road east of Hullavington → Bradfield Cottages → Norton → Unnamed Road between Norton and Fosse Way.

Hullavington and Hill Hayes Lane Route

3.1.4 A summary of the Hullavington and Hill Hayes Lane Route is set out as follows:

- M4 Junction 17 → A429 → Unnamed Road east of Hullavington → The Street → Hill Hayes Lane → Unnamed Road between Norton and Fosse Way.

3.1.5 All potential construction routes were considered from the inception of the Scheme, including the Hullavington and Hill Hayes Lane Route. However, this construction route was omitted from **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**.

3.2 Cable Route Corridor – Access 101 and 102 East of Grittleton

3.2.1 The Applicant considered two alternative potential construction routes that would enable access to Access 101 and 102 to the east of Grittleton and which are located outside the CNL. These routes are as follows:

Hullavington Route

3.2.2 A summary of the Hullavington Route is set out as follows:

- M4 Junction 17 → A429 → Unnamed Road east of Hullavington → The Street → Access 101 and 102.

3.2.3 All potential construction routes were considered from the inception of the Scheme, including the Hullavington Route. However, this construction route was omitted from **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**.

Stanton St Quintin Route

3.2.4 A summary of the Stanton St Quintin Route is set out as follows:

- M4 Junction 17 → A429 → Unnamed Road between A429 and The Street via Stanton St Quintin → The Street → Access 101 and 102.

3.2.5 All potential construction routes were considered from the inception of the Scheme, including the Hullavington Route. However, this construction route was omitted from **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**.

3.3 The Cable Route Corridor – Access 103 to 108 South of Grittleton

3.3.1 The Applicant considered one alternative potential construction route that would enable access to Accesses 103 to 108 to the south of Grittleton and which is located outside the CNL. This route is as follows:

Kington St Michael Route

3.3.2 A summary of the Kington St Michael Route is set out as follows:

- M4 Junction 17 → A350 → Kington St Michael → Honey Knob Hill → Access 103 to 104 Neeld Court/Access 105 to 106 Sevington/Access 107 to 108 Cromhall Lane

3.3.3 All potential construction routes were considered from the inception of the Scheme, including the Hullavington Route. However, this construction route was omitted from **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**.

3.4 Justifications for Exclusion

3.4.1 A detailed justification for why the above potential construction routes outside the CNL were not considered suitable for the Scheme is provided below.

Norton Route (Solar PV Sites)

- 3.4.2 Upon entering Norton from Bradfield Cottages, the Norton Route would use carriageway which narrows and routes through an undulating section of highway, over an existing bridge structure and towards a junction in the centre of Norton, as shown in **Plate 3-1**.



Plate 3-1: Single Lane Carriageway Over Existing Bridge in Norton

- 3.4.3 The highway shown in **Plate 3-1** demonstrates the physical constraints which limit forward visibility and the limited potential to undertake any required highway widening works for construction traffic.
- 3.4.4 The route then continues through Norton via further sections of single-lane carriageway as shown in **Plate 3-2**.



Plate 3-2: Single Lane Carriageway Routing Through Norton

- 3.4.5 As shown in **Plate 3-2**, the extent of public highway and presence of adjacent dry-stone walls would prevent the possibility of widening works to the existing section of single-lane carriageway.
- 3.4.6 As the route continues out of Norton, the carriageway comprises a number of pinch points and bends with limited forward visibility.
- 3.4.7 As the route continues towards the Fosse Way there is another section of constrained single-lane carriageway routing past Fosse Farm which is shown in **Plate 3-3**.



Plate 3-3: Single Lane Carriageway Routing past Fosse Farm

3.4.8 The section of highway shown in **Plate 3-3**, is particularly constrained and given the limited verge available would require significant widening and engineering works outside of the public highway boundary.

3.4.9 With reference to the identified characteristics set out within **Section 2.2**, the Norton Route was discounted as it includes the following:

- Extensive limited forward visibility;
- Extensive lengths of single lane carriageway;
- The requirement for extensive highway mitigation and engineering works;
- The requirement for extensive vegetation removal; and
- Narrow or weak bridge structure.

Hullavington and Hill Hayes Lane Route (Solar PV Sites)

3.4.10 The Hullavington and Hill Hayes Lane route would require construction traffic to route west from Hullavington crossroads. It would route through the centre of Hullavington village and directly past the village primary school. Construction traffic would then be required to turn at The Street/Hill Hayes Lane priority junction. This junction is shown in **Plate 3-4** and **Plate 3-5** for reference.



Plate 3-4: The Street/Hill Hayes Lane Junction (from The Street)



Plate 3-5: The Street/Hill Hayes Lane Junction (from Hill Hayes Lane)

- 3.4.11 The Street/Hill Hayes Lane junction is constrained with limited visibility for vehicles turning out of Hill Hayes Lane. The junction would require significant improvement outside of the highway boundary.
- 3.4.12 As the route continues along Hill Hayes Lane, the carriageway accommodates existing on-street parking and narrows to a single-lane carriageway with limited forward visibility. This is shown in **Plate 3-6**.



Plate 3-6: Narrow Walled Section Routing Through Hill Hayes Lane

- 3.4.13 As shown in **Plate 3-6**, the extent of public highway, presence of adjacent dry-stone walls, and potential impact on existing residential properties would prevent the possibility of widening works to the existing section of single-lane carriageway.
- 3.4.14 As Hill Hayes Lane routes out of Hullavington and towards the Fosse Way, the route continues as a single-lane carriageway for the remaining two miles. An example of this route is shown in **Plate 3-7**. This would require a significant length of widening works which could not be delivered in a number of sections due to the limited availability of verge and the extent of highway engineering works required.



Plate 3-7: Narrow Section of Hill Hayes Lane Routing Towards Fosse Way

- 3.4.15 As shown in **Plate 3-8**, the route also crosses over a narrow railway bridge. This comprises a single-lane carriageway with limited visibility due to sharp bends in the carriageway at either end of the bridge. Any widening works for construction traffic in this location would not be feasible without significant engineering works.



Plate 3-8: Narrow Railway Bridge between Hullavington and Farleaze

3.4.16 With reference to the identified characteristics set out in **Section 2.2**, the Hullavington and Hill Hayes Lane Route was discounted as it includes the following:

- Extensive limited forward visibility;
- A school;
- Village/residential centres;
- Extensive lengths of single lane carriageway;
- The requirement for extensive highway mitigation and engineering works;
- The requirement for extensive vegetation removal; and
- Narrow or weak bridge structure.

Hullavington Route (Cable Route Corridor – Access 101 and 102)

3.4.17 The Hullavington route would require construction traffic to route west from Hullavington crossroads. It would route through the centre of Hullavington village and directly past the village primary school, as shown in **Plate 3-9** for reference. Construction traffic would then be required to route through a narrow section of highway with limited forward visibility.



Plate 3-9: Route Past School in Hullavington

3.4.18 With reference to the identified characteristics set out in **Section 2.2**, the Hullavington Route was discounted as it includes the following:

- A school; and
- Village/residential centre.

Stanton St Quintin Route (Cable Route Corridor – Access 101 and 102)

3.4.19 The Stanton St Quintin route would require construction traffic to route west from the A429. It would route through the centre of Stanton St Quintin village and directly past the village primary school, this is shown in **Plate 3-10** for reference.



Plate 3-10: Route Past School in Stanton St Quintin

3.4.20 With reference to the identified characteristics set out in **Section 2.2**, the Stanton St Quintin Route was discounted as it includes the following:

- A school; and
- Village/residential centre.

Kington St Michael Route (Cable Route Corridor – Access 103 to 108)

3.4.21 The Kington St Michael route would require construction traffic to route east from the A350, via a narrow and undulating road. It would route towards and through the centre of Kington St Michael village and past the village primary school. The village of Kington St Michael accommodates a large amount of on-street parking and a number of narrow single lane sections of carriageway with limited forward visibility. This is shown in **Plate 3-11** and **Plate 3-12** for reference.



Plate 3-11: Route Entering Kington St Michael



Plate 3-12: Route Through Kington St Michael Village

- 3.4.22 Once out of the village, construction traffic would then be required to route via Honey Knob Hill and extensive lengths of narrow single lane carriageway with limited forward visibility. Any widening works for construction traffic in this location would not be feasible without significant engineering works. This is shown in **Plate 3-13** for reference.



Plate 3-13: Route Along Honey Knob Hill

3.4.23 With reference to the identified characteristics set out in **Section 2.2**, the Kington St Michael Route was discounted as it includes the following:

- Extensive limited forward visibility;
- A school;
- Village/residential centres;
- Extensive lengths of single lane carriageway;
- The requirement for extensive highway mitigation and engineering works; and
- The requirement for extensive vegetation removal.

4 Selection of Construction Routes within the Cotswold National Landscape

4.1 Construction Routes Selected within the Cotswold National Landscape

4.1.1 The Applicant selected the following proposed construction routes within the CNL that would enable access to Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor.

4.1.2 All proposed construction routes accessing these locations will travel along the A46, north of the M4 motorway and then continues to the Grittleton crossroads, south of the South Wales Mainline and via the B4040 and B4039. Details of the routes are as follows and shown in **ES Volume 2, Figure 13-11: Construction Access Locations: Solar PV Sites [APP-156]** and **ES Volume 2, Figure 13-12: Construction Access Locations: Cable Route Corridor [APP-157]**:

- **Lime Down A:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Alderton Road → Fosse Way → Unnamed Road between Fosse Way and Sherston;
- **Lime Down B and C:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Alderton Road → Fosse Way;
- **Cable Route Corridor Access 101 and 102:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → The Street, Grittleton;
- **Cable Route Corridor Access 103 and 104:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Road South of Grittleton Crossroad → Neeld Court;
- **Cable Route Corridor Access 105 and 106:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Road South of Grittleton Crossroad → Sevington; and
- **Cable Route Corridor Access 107 and 108:** M4 Junction 18 → A46 → B4040 → B4039 → Unnamed Road west of Grittleton → Road South of Grittleton Crossroad → Cromhall Lane.

4.2 Justifications for Inclusion

4.2.1 The proposed construction routes to Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor, are considered to be the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects.

- 4.2.2 The proposed construction routes utilise A-road and B-roads for a majority of its length and avoids the use of unsuitable single-lane minor roads. It also splits construction traffic for the Scheme between two motorway junctions with those serving Lime Down D and E routed from Junction 17 of the M4.
- 4.2.3 With reference to the identified characteristics set out in **Section 2.2**, the proposed construction routes are preferred for the following reasons:
- Good forward visibility along the majority of the route;
 - No significant accident hotspots;
 - Does not pass any schools;
 - Minimises routing on minor roads through village centres;
 - Does not comprise extensive lengths of single lane carriageway;
 - Limited highway mitigation and engineering works;
 - Limited requirement for vegetation removal; and
 - No narrow or weak bridge structures.

4.3 Agreement of the Proposed Construction Routes with Wiltshire Council

- 4.3.1 As detailed in Table 13-2 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, the Applicant has engaged with Wiltshire Council regarding the construction routes and confirmed that the proposed construction routes were most appropriate for the purposes of the Scheme.
- 4.3.2 The agreement of the proposed construction routes with Wiltshire Council is confirmed in Appendix A of their Relevant Representation submitted to the Planning Inspectorate in January 2026 **[RR-4934]**.
- 4.3.3 In Paragraph 16 of Appendix A of their Relevant Representation **[RR-4934]**, Wiltshire Council states the following:
- “Plate 4-3 shows the various construction routes considered for access to Lime Down Sites A-C. It is agreed that the route to / from the M4 via the A46, B4040, B4039 and Fosse Way is the best of the alternatives considered.”*

4.4 Development of an Environmentally Sensitive Design

- 4.4.1 Highway mitigation works are proposed within the CNL on Alderton Road within the identified Highway Improvement Area. These works will comprise minor carriageway widening and will be agreed at the detailed

design stage. The works will only include highway verge and avoid any hedgerow removal.

- 4.4.2 The Applicant will agree to sensitive construction details, such as conservation kerbs which are specialized concrete edging units designed to provide structural support while complementing environmentally sensitive or historically significant areas. This will be secured through the technical approval process and the final CTMPs.
- 4.4.3 The construction vehicle movements will be managed through final CTMPs. An **Outline CTMP [APP-287]** has been prepared and submitted with the DCO application. The aim of the final CTMPs is to ensure that the effect of the construction phase on the local highway network is minimised.
- 4.4.4 The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the final CTMPs will be monitored by the undertaker, contractor and Wiltshire Council as local highway authority.
- 4.4.5 The preparation, approval and implementation of the final CTMPs, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft DCO [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

5 Conclusion

- 5.1.1 In conclusion, the only two alternative potential construction routes that can be considered by the Applicant to access Lime Down A, B and C whilst remaining outside of the CNL are the routes via Norton or Hullavington and Hill Hayes Lane. Further to a desktop study, site visits, and consideration to the mitigation hierarchy set out in Section 2 of this TN, these alternative potential construction routes were concluded to be unsuitable for construction traffic.
- 5.1.2 There are three alternative potential construction routes that can be considered by the Applicant to travel to Accesses 101 to 108 of the Cable Route Corridor whilst remaining outside of the CNL which include the route via Hullavington, Staton St Quintin, and Kington St Michael. Further to a desktop study, site visits, and consideration to the mitigation hierarchy set out in Section 2 of this TN, these alternative potential construction routes were concluded to be unsuitable for construction traffic.
- 5.1.3 The preferred construction routes to Lime Down A, B and C and Access 101 to 108 of the Cable Route Corridor, as agreed with Wiltshire Council, are considered the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects.

6 References

- Ref 1 Institute of Sustainability and Environmental Professionals (ISEP) (2023)
ISEP Guidelines: Environmental Assessment of Traffic and Movement.
Available at: <https://www.ISEP.net/media/5mrmquib/ISEP-report-environmental-assessment-of-traffic-and-movement-rev07-july-2023.pdf>.
[Accessed 15 April 2026].