



# **Applicant's Response to Stop Lime Down Written Representations – Appendix D Transport Report**

**June 2026**

**Revision 1**

**Planning Inspectorate Reference: EN010168**

**Document Reference: EXAM/9.34**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

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## 1 Introduction

- 1.1.1 An application (the ‘Application’) was 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 Lime Down Solar Park Limited (the ‘Applicant’) on 19 September 2025 and was accepted for examination on 17 October 2025. The examination commenced on 21 April 2026.
- 1.1.2 At Deadline 1 and 2 of Examination, Stop Lime Down provided comments regarding transport and access matters relating to the Scheme in **Written Representation, Appendix D (Transport Report) [REP1-172]**, **Written Representation, Appendix Y (Lime Down Public Rights of Way Survey) [REP1-187]** and Appendix B in **Stop Lime Down Comments on Submissions Received at Deadlines 1 and 1A [REP2-051]**.
- 1.1.3 This Technical Note has therefore been prepared by the Applicant in response to these submissions, as well as clarify outstanding details outlined in **9.22 Applicant's Response to Written Representations [REP2-079]** which was prepared to address matters raised in **Written Representation, Appendix D (Transport Report) [Rep1-172]**.
- 1.1.4 The responses within this Technical Note should be read in conjunction with **9.22 Applicant's Response to Written Representations [REP2-079]**.
- 1.1.5 The Technical Note follows the following structure:
- **Section 2** provides responses to comments raised by Stop Lime Down in Appendix B in **Stop Lime Down Comments on Submissions Received at Deadlines 1 and 1A [REP2-051]**;
  - **Section 3** provides responses to comments raised by Stop Lime Down in **Written Representation, Appendix D (Transport Report) [REP1-172]**, **Written Representation, Appendix Y (Lime Down Public Rights of Way Survey) [REP1-187]**; and
  - **Section 4** provides a summary and conclusion regarding the matters raised within this Technical Note.

## **2 Applicant's Response to Stop Lime Down's Comments on Submissions Received at Deadlines 1 and 1A, Appendix B [REP2-051]**

2.1.1 Since the Deadline 1 submission, Appendix B has been issued by Stop Lime Down which provides further commentary on the submitted transport documents, and a detailed response to the points raised within it will be provided within this Technical Note.

2.1.2 Paragraph 2.9 of Appendix B states:

*“Scrutiny of the additional information that has been provided in Annex E of the TA raises the following questions and concerns:*

*Whereas the number of HGVs associated with the transport of solar modules is based on an assumption of 500 per HGV, the calculation of the number of HGVs associated with the transport of mounting structures is based on an assumption of 21 tonne loads. Given the nature of the mounting structures (tubular, prefabricated), it appears unlikely that loads could be as high as 21 tonnes. The applicant needs to provide justification for this assumed vehicle loading”*

2.1.3 The figures within the Applicant's analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the draft layouts designs provided by the Applicant. The transport of mounting structures is based on the total weight of mounting structures and the quantity of which could be accommodated per Heavy Good Vehicle (HGV), i.e 21 Tonnes per HGV.

2.1.4 Paragraph 2.9 bullet point 2 goes on to state:

*“The calculations assume that there would be 18kg of mounting structure per solar panel. These appears to be low given the need for the mounting structures to be of sufficient strength of support large areas of panels and the need to employ piles of significant length to achieve sufficient stability. This is a further matter that required clarification;”*

2.1.5 The figures within the Applicant's analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the design layouts produced by the Applicant. A mounting structure holds more than one panel so simply dividing the total number of panels by the total weight of mounting structures as SLD has done is not a true representation of the weight of a mounting structure. Solar PV Panels would be secured via metal posts driven into ground to an approximate depth of 1.5 m to 4 m (dependant on ground conditions). In areas where

archaeological protection is required, concrete feet or other non-ground penetrative techniques would be used.

2.1.6 Paragraph 2.9 bullet point 3 states:

*“The revised information does not address the issue raised in the original SLD Transport Report regarding the low level of solar panel coverage within the Works No. 1 areas;”*

2.1.7 The figures within the Applicant’s analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the layouts design by the Applicant. The SLD calculations assume 4,304 panel deliveries which would result in 2,154,240 Solar PV Panels. It is noted that NPS EN-3, paragraph 2.10.17, indicates that 2-4 acres will be required for each MW of output, with 50MW of generation requiring 125 to 200 acres and 100,000 to 150,000 panels.<sup>1</sup> This equates to a panel density of 750 to 800 panels per acre; or, were one to fit 150,000 panels on only 125 acres, a maximum density of 1,200 panels per acre. The fenced area containing solar panels in Lime Down is 469 ha (1159 acres). Assuming this area was entirely filled with panels (which the Applicant does not consider to be realistic), this would still only result in 1,390,800 panels being laid within the 1159 acre area. It is therefore clear that SLD’s assumptions, being 1.55 times the maximum possible density using the NPS figures, are not a reasonable assumption.

2.1.8 The Applicant’s HGV analysis includes 1200 Solar PV Panel deliveries on standard HQ containers carrying 500 in each (600,000 panels). If high cube containers are used these can transport 720 Solar PV Panels each, which would equate to 864,000 Solar PV Panels (which easily accommodates the sensitivity testing of up to 842,000 panels in the Climate Response to Wiltshire Council Appendix B of Written Rep and Stop Lime Down Appendix J1 **[EN010168/EXAM/9.33]**). In addition, a 50% buffer has been added to the traffic flows to ensure a reasonable worst case scenario has been assessed

2.1.9 Paragraph 2.9 bullet point 4 states:

*“It is assumed that packaging from solar panels and mounting structures would be transported in 10 tonne loads. As has been described in the Deadline 1 SLD Transport Report, it is highly unlikely that it would be*

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<sup>1</sup> NPS EN-3 does not set out the assumptions used for these calculations, with the individual panel size being a key determinant of the number of individual panels required to achieve 1MW of generation.

*possible to compress packaging materials sufficiently to achieve 10 tonne loads;”*

- 2.1.10 The Applicant’s assessment includes the use of 20 tonne capacity tippers. A tipper has a carrying volume of 20 cubic metres which equates to a compacted 11.1 tonne mixed load of wood, plastic, paper and cardboard. A waste compactor will be located within each parcel of the Site and a commitment to this is made within **Outline Construction Traffic Management Plan (CTMP) [REP1-112]**.
- 2.1.11 Paragraph 2.9 bullet point 5 states:  
  
*“It is suggested that BESS units can be transported on 16.5m articulated vehicles. It appears likely that each BESS unit would weight around 42 tonnes. This would constitute an abnormal load since the total weight of the vehicle plus load would be far in excess of the maximum permitted conventional load of 44 tonnes;”*
- 2.1.12 The Applicant confirms that BESS Containers would still be transported by 16.5 m articulated vehicles. The BESS Containers would be transported in 20 ft or 40 ft containers as they are modular. If 40ft containers were used, the weight would lead to the vehicles being classed as AILs; however, 20 ft BESS Containers are below the overall weight limit. A 40ft container would still be delivered on the same type of HGV (16.5m articulated vehicle). 270 BESS units are shown in the layout drawings. To ensure the reasonable worst case is assessed, the Applicant’s transport analysis has assumed 425 BESS Containers of 20 ft, plus 16 HGVs to transport associated electrical equipment (cables). Allowing for a 50% uplift of these deliveries this equates to 661 16.5m articulated HGVs. This approach recognises that, whilst BESS Containers could be transported as AILs, doing so would not represent the worst-case scenario.
- 2.1.13 Paragraph 2.9 bullet point 6 states:  
  
*“The calculation assume that the depth of foundations for the substations and BESS would be 0.3m. This is likely to be an underestimate, given the need for stable structures and the mass of the components involved;”*
- 2.1.14 The depth of the BESS Area in the Applicant’s assessment is assumed as 0.3 m minimum, and assumes the whole area is laid at this depth, when in reality much of the area that is not required for hardstanding will be permeable surface such as a reinforced grass system. The application of a uniform depth enables a realistic worst-case assessment, and allows for areas of deeper foundations offset with areas of permeable surfacing. The layout of the BESS Area is subject to detailed design.
- 2.1.15 Paragraph 2.9 bullet point 7 states:

*“No allowance has been made for the main electrical components of the substations;”*

2.1.16 The figures within our analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the indicative layouts design by the applicants’ engineers. A total of 441 HGV deliveries are included within the assessment for the transport of 270 BESS Containers and associated cables and which have integrated conversion units.. The main components like transformers/substations will be transported by ALL, which is a small number of individually managed deliveries, separate from this main assessment.

2.1.17 Paragraph 2.9 bullet point 8 states:

*“The allowance for ‘skids/power stations’ that do not constitute a part of the scheme description and which was assumed in the Deadline 1 SLD Transport Report to refer to conversion units (166 in total) both fails to account for the number of conversion units and fails to account for the construction of foundations;”*

2.1.18 The exact number of Conversion Units may change within the envelope of the Solar PV Sites and will be confirmed at the detailed design stage. A number of conversion units are assessed in the transport analysis and were based on an indicative draft layout. If the number of units were to increase to 166, this would not change the predicted peak flows, given the buffer allowed in the assessment for in the aggregate for the access tracks and a 50% uplift. Paragraph 2.9 bullet point 9 states:

*“No allowance has been made for the delivery and movements of machinery and equipment;”*

2.1.19 No specific allowance has been made for the delivery or movement of construction machinery and equipment, as these activities are already captured within the conservative assumptions applied to HGV activity. A 50% uplift has been incorporated into all HGV movement forecasts. This approach provides a suitably precautionary basis for assessment, and any additional machinery related movements are accommodated within the uplifted totals and do not require separate quantification.

2.1.20 Paragraph 2.9 bullet point 10 states:

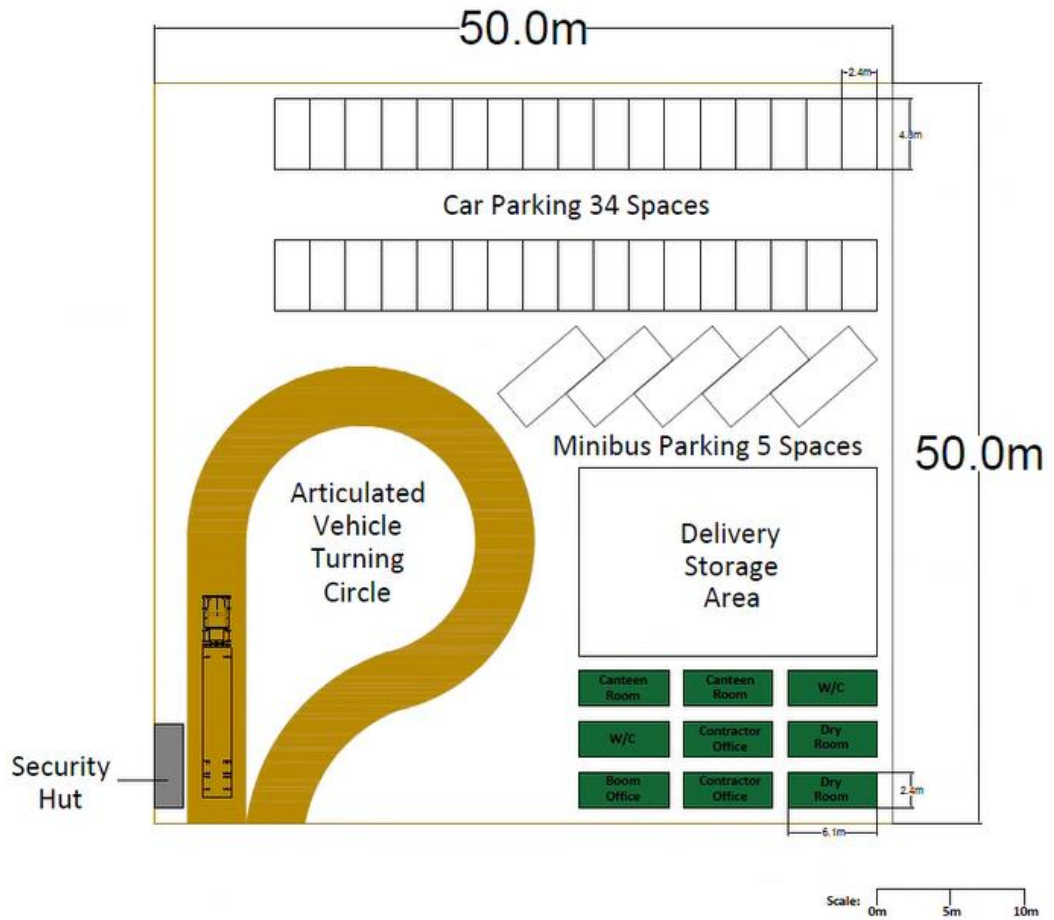
*“The allowance that has been made for the construction and removal of compounds would imply that the compounds were less than 50m x 50m. This is very unlikely to be feasible;”*

An example of a 50m x 50m Temporary Construction Compound Layout is shown in Plate 2-1 below. There are multiple compounds in some parcels.

The below summarises the number of compounds per parcel along with worker trips. It clearly shows enough capacity to cater for the number of workers and corresponding vehicles set out in **Table 1**. Compound aggregate can also be reused for where other aggregate is required elsewhere.

**Table 1: Indicative Car Parking Required at Each Compound**

	Parcel					
	A	B	C	D (West)	D (East)	E
Shuttle Bus Trips	2	2	5	5	1	4
Car	21	20	59	55	13	42
Number of Compounds	1	1	2	2	1	2
<b>Required Shuttle Bus Spaces per Compound (a./c.)</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>1</b>	<b>2</b>
<b>Required Car Parking Spaces per Compound (b./c.)</b>	<b>21</b>	<b>20</b>	<b>30</b>	<b>28</b>	<b>13</b>	<b>21</b>



**Plate 2-1 50 x 50 Compound Layout**

- 2.1.21 Paragraph 2.9 bullet point 11 states:
- “Although there is an ‘allowance for spoil and building compound areas’ it appears that the allowance falls short of that associated with the compounds. It does not appear reasonable to assume that there has been any allowance for the removal or transport of spoil;”*
- 2.1.22 An allowance for the removal of spoil was included within the HGV trip generation figures under general, however, it is proposed that spoil will remain within the Order Limits. In addition, a 50% uplift has been applied to all projected HGV construction movements. This has been incorporated across all construction activities and delivery operations including the removal of spoil and building compound areas.
- 2.1.23 Paragraph 2.9 bullet point 12 states:
- “No allowance is made for any off-site highways works.”*
- 2.1.24 Off-site highway works will be implemented prior to the stated construction period as they are required to facilitate construction vehicles but will involve a low number of trips and not exceed the peak number of trips stated in the assessment.
- 2.1.25 Paragraph 2.10 states:
- “It is concluded that although more detail has been provided regarding the generation of HGV movements during construction, the additional detail does not overcome the concern that the overall number of HGV movements has been under-estimated”*
- 2.1.26 The Stop Lime Down calculations have been reviewed in detail in Section 3.5 of this Technical Note.
- 2.1.27 Paragraph 2.11 states:
- “The applicant provides new information about the proportion of construction HGVs that would be 16.5m articulated vehicles and the proportion that would be 10m tipper or rigid vehicles (para. 1.5.9). The distinction between 16.5m articulated vehicles and 10m rigid vehicles does not overcome the highway safety concerns arising from the use of rural lanes that are of insufficient width to accommodate passing HGVs and the impacts on vulnerable highway users (pedestrians, cyclists and equestrians).”*
- 2.1.28 All the swept path analysis that has been undertaken comprises two 16.5 m articulated vehicles passing each other as a worst case. 10 m tipper lorries form the majority of trips during the construction period and can fit within shorter length passing points. Network Rail are carrying out works in

the area with an access on Fosse Way used until October 2026 and a site visit observed tipper lorries travelling along Fosse Way and Alderton Road without issue.

2.1.29 Paragraph 2.12 states:

*“The construction programme (Table 13-9) has been amended to show the construction of the 400kV substation. This was not identified in the original TA. It is suggested that the 400kV substation would be constructed in the first 6 months of the construction programme. This appears to be an extremely tight timescale and one that is unlikely to be achievable. It is suggested that the 400kV substation will be fully constructed before work starts on Lime Down E. The effect of this change is to lead to lower peak HGV trip generation on the Junction 17 route.”*

2.1.30 The 400 kV Substation was included in the **Outline CTMP [REP1-112]** previously but is now split out as it is located within Lime Down D West. The construction timetable allocates 26 weeks to undertake this work, however, the construction timetable presented in the **Outline CTMP [REP1-112]** is subject to change and would be presented in the final CTMP(s). A six month period was selected to represent the realistic worst case scenario for assessment as it provides a higher peak value than spreading the trips across a two year period.

2.1.31 Paragraph 2.13 states:

*“The construction programme has also been amended to alter some of the assumed duration of works at the various sites and to separate the works for the two parts of Lime Down D, the BESS and the 400kV substation. These changes also have the effect of reducing maximum HGV flows on the most sensitive route on the lane east of Hullavington and Bradfield Cottages. It should be noted that the overall number of HGV movements has not altered from the initial assessments. This means that if the peak level of HGV movements has reduced, the period over which a certain level of HGV movement occurs is increased.”*

2.1.32 The construction programme and vehicle numbers presented in the **Outline CTMP [REP1-112]** are subject to change and would be presented in the final CTMP(s). The only amendment to the **Outline CTMP [REP1-112]** is that Lime Down D has now been split into Lime Down D East and Lime Down D West. This is because the access strategy includes an access north off the A429 and this was not factored into the previous traffic distribution, but it was included in the works plans and order limits. It has been assumed that the peak occurs at the same time for both Lime Down D East and Lime Down E. The total construction period hasn't increased,

but HGVs previously recorded on the Bradfield Cottages route have been redistributed to the less sensitive A429 route.

2.1.33 Paragraph 2.14 states:

*“A new Annex F is included showing flow diagrams of HGV movements for every hour of the working day in the 50% uplift situation and the average HGV flow situation. New paragraph 1.5.16 of Part 1 of the TA states that this, ‘confirms the low probability of two HGVs meeting on the construction routes’. In the 50% uplift situation the number of construction HGVs on the lane east of Hullavington and on the Fosse Way are shown to be between 2 and 4 HGVs in each direction over the 09:00-17:00hrs period. Existing HGV flows on these roads are shown to be between 0 and 7 in each direction over the same period. The numbers do not confirm the ‘low probability’ of two HGVs meeting on the construction routes. On the contrary, given the time that HGVs will be travelling along the constrained sections of the access routes, the numbers indicate there to be a high probability of HGVs meeting.”*

2.1.34 The length of the construction route from Alderton Road where it meets The Street at Grittleton, to the access at Lime Down C, is approximately 3.1 km. Assuming a 25 mph speed, an existing HGV flow of 2 northbound and 1 southbound and proposed HGV flows of 4 northbound and 4 southbound; there would be a 1 in 8 chance of two HGVs meeting on the 3.1km length of route. This equates to an 88% chance that a meeting will not occur, being a low probability of HGVs meeting. These figures are taken from the 50% maximum flows at the peak hour (10:00 to 11:00) set out in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**. In addition, HGV movements are managed through the final CTMP(s) along with the use of existing and proposed passing points. At non-peak construction times the probability of a meeting would decrease further. In addition, the Applicant’s booking system would help to further reduce the probability of two HGVs meeting.

2.1.35 The length of the construction route from The Street at Hullavington to Lime Down D West access is approximately 980 m. Assuming an average speed of 25 mph, an existing HGV flow of 7 northbound and 4 southbound and proposed HGV flows of 3 northbound and 3 southbound, there would be a 1 in 26 chance of two HGVs meeting on the 980m length of route. This equates to a 96% chance that a meeting will not occur, being a low probability of HGVs meeting. These figures are taken from the 50% maximum flows at the peak hour (13:00 to 14:00) set out in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]**. HGV movements are managed through the final CTMP(s) along with the use of existing and proposed passing points. At non-peak construction

times the probability of a meeting would decrease further. In addition, the Applicant's booking system would help to further reduce the probability of two HGVs meeting.

2.1.36 Paragraph 2.22 states:

*“Section 6.6, last bullet point states that, ‘Once deliveries have been made to the compound in Lime Down E, Solar PV equipment will be distributed around Lime Down E via tractor and trailer. No Articulated HGV vehicles will route beyond the proposed compound areas’. This suggests that larger vehicles would not be used on the highly constrained lanes and tracks south of the railway. However, a compound is proposed south of the railway. The applicant needs to provide clarity about how construction vehicles will operate in relation to the two compounds, north and south of the railway and construction areas around these compounds”*

2.1.37 As outlined in Section 6.6 of the **Outline CTMP [REP1-112]**, HGVs will deliver equipment to the main construction compound north of the railway bridge, equipment will then be offloaded and transported on tractor and trailer in smaller quantities to the southern compound.

2.1.38 Paragraph 2.23 states:

*“Section 6.7 deals with the proposed HGV online booking system intended to avoid the risk of HGVs meeting on constrained rural lanes. Suppliers and subcontractors are expected to have appropriate technology to allow ‘real-time tracking’. It is not clear how such an obligation can be imposed on suppliers and subcontractors and how this would avoid conflicts arising if and when vehicles are delayed or arrive early.”*

2.1.39 A Traffic Management and Monitoring System (TMMS) will be considered for implementation as part of the final CTMP(s) to provide details of the technologies and other means employed to monitor HGVs to/from the Compounds (e.g. Global Positioning System (GPS) and Automatic Number Plate Recognition (ANPR)). This will enable the Applicant to monitor the following:

- Compliance with the HGV routes;
- Compliance with the number of HGV limits in terms of the number of deliveries arriving and departing at any one time and over the course of the day; and
- Compliance with the timing restrictions. In addition, the TMMS will also record all LGVs which enter and exit the Solar PV Site, to allow all vehicles to be monitored.

- 2.1.40 In the instance that a complaint has been made in relation to inappropriate routes being used, this will be cross-referenced with the TMMS to allow appropriate actions to then be taken. The precise form of TMMS will be determined following the appointment of a contractor and will be set out in the final CTMP(s). This would include a summary of the contractual requirements that those visiting the Solar PV Site will have to adhere to, along with the measures to be taken for noncompliance.
- 2.1.41 The overall management and implementation of the final CTMP(s) will be the responsibility of the Applicant. A Traffic Safety Control Officer will be appointed by the Applicant to develop, implement, and manage the final CTMP(s). On behalf of the Applicant, the Traffic Safety Control Officer will:
- a. Implement and monitor the final CTMP(s) to:
- Identify successful measures and areas for improvement;
  - Promote the final CTMP(s) to all staff and contractors travelling to and from the Solar PV Site to ensure compliance with its contents;
  - Liaise as appropriate with local transport and traffic groups, local planning authorities, local highway authorities and National Highways;
  - Monitor data relating to HGV routes, timing of HGV arrivals and departures and compliance with the HGV routing;
  - Manage the Car Share Scheme;
  - Manage the minibus service between local worker accommodation and the Solar PV Site; and
  - Discuss any issues with relevant parties and identify any amendments to the final CTMP(s) (including measures) to ensure compliance is maintained.
- 2.1.42 The Applicant will take all reasonable steps to avoid any breach of the final CTMP(s) through the implementation of the management measures. However, should any breaches occur, then enforcement procedures will be followed:
- The Traffic Safety Control Officer will notify the Applicant of any breaches of the final CTMP(s) arrangements as and when they occur;
  - The Applicant will issue a warning letter to the relevant contractor outlining what action would be taken in the event of any further noncompliance (in general terms); and
  - The Applicant will report the details of the response to the Traffic Safety Control Officer as part of the monitoring report. The monitoring report will be made available to the relevant local planning authorities and

relevant highway authorities at their request to ensure compliance and to demonstrate that action is being taken where necessary. Further detail on the sanctions which could be applied will be included within the final CTMP(s).

2.1.43 Paragraphs 2.26 and 2.27 state:

*“Alternative construction access routes are described and the reasons for them being discounted set out. The criteria used to assess alternative routes comprise the following:*

- *‘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’. (para. 2.2.2)*

*.....Although these criteria are used to exclude the possibility of using the alternative routes, they also apply to many of the routes that have been adopted. The following list provides examples of where the criteria apply to adopted routes:*

*Extensive limited forward visibility: road east of Hullavington, Bradfield Cottages”*

2.1.44 Drawings 2306-020\_SP51-A illustrates two HGVs passing each other at passing points and the achievable intervisibility splays between passing places between Dyson Roundabout and Bradfield Cottages. Drawing SP51-A demonstrates that all intervisibility splays between passing places are under 168 m demonstrating good level of intervisibility. See ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]

*“Accident Hotspots: Junction of Fowlswick Lane and B4039 (cable route compound access), Junction of Sheldon Corner with A420 (cable route access).”*

2.1.45 The accident study included in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** takes account of this, there were three accidents over 5 years at this location so isn’t regarded as an accident hotspot. A Solar

Farm has already been constructed along Fowlswick Lane, with construction traffic routing via this junction with the B4039 route.

*“Schools: Acton Turville”*

- 2.1.46 The construction access routes do not pass Acton Turville School. The construction access routes show vehicles routing from the A46 to the west towards Acton Turville on the B4040 and through it via the B4039/Burton Road. Construction vehicles do not turn onto Littleton Drew Road where Acton Turville Primary School is located. The school is over 250m along Littleton Drew Road from the junction with the construction route

*“Village/residential centres: Grittleton, Acton Turville, Burton, Gastard”*

- 2.1.47 Justification for the proposed route through Grittleton was provided within **9.15 Cotswolds National Landscape Technical Note [REP1-131]**.
- 2.1.48 Burton is located on the B4039 and is already used well by existing HGVs. The low number of HGVs that will pass through Gastard will remain on the B3353, this is a two-way carriageway that already accommodates HGVs. HGVs will travel through Gastard to one cable route access point. This access point will accommodate 4 HGVs, 4 transit vans and 10 workers each day. The access will be used for approximately 90 days over the construction phase.

*“Extensive lengths of single lane carriageway: Fosse Way, road east of Hullavington, Bradfield Cottages (HGVs), Neeld Court, Road to Sevington”*

- 2.1.49 A single lane carriageway in this case is meant as where two cars cannot pass or single-track lanes. The use of Neeld Court helps to reduce traffic in Grittleton and has low existing traffic flows, and the road to Sevington is only used for 200 m. All the remaining roads on the construction access routes are not single track.

*“The requirement for extensive vegetation removal: Applicant seeks to avoid the need for extensive vegetation removal through the use of banksmen in numerous locations.”*

- 2.1.50 This refers to access points rather than construction access routes. The use of banksmen is a commitment in the **Outline CTMP [REP1-112]** which limits the removal of vegetation in visibility splays. The traffic management measures required for safe entry to and egress from the access points will be confirmed in the detailed CTMP(s).

### **3 Applicant's Response to Stop Lime Down's Written Representation, Appendix D [REP1-172] and Appendix Y [REP1-187]**

3.1.1 This section responds to comments made in **Written Representation, Appendix D (Transport Report) [REP1-172]** and **Written Representation, Appendix Y (Lime Down Public Rights of Way Survey) [REP1-187]** of the Stop Lime Down's representation where they have not been superseded by comments in **Appendix B [REP2-051]** or already responded to in Written Representations. This includes:

- Sensitivity of receptors and rural lanes;
- Highway Code;
- PRow measure;
- HGV Trip Generation; and
- **Written Representation, Appendix Y (Lime Down Public Rights of Way Survey) Questionnaire [REP1-187].**

### **3.2 Sensitivity of Receptors and Rural Lanes**

3.2.1 **Written Representation, Appendix D (Transport Report) [REP1-172]** concludes that the Applicant fails to take account of road widths and sensitivity to vulnerable road users in its categorising of the sensitivity of links.

3.2.2 The ISEP guidance doesn't define sensitivity by road geometry, instead it focuses on people and land use affected by traffic. Road width is a physical road characteristic so is not considered in the receptor sensitivity but is considered under magnitude of impact and baseline conditions. Put simply, sensitivity is defined by who is affected and magnitude is how big the change is.

3.2.3 Table 13-3 of **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** sets out sensitivity threshold and states that receptors of high sensitivity are those with greatest sensitivity to traffic flows such as schools, hospitals, playgrounds/recreational spaces, accident blackspots, retirement/nursing homes and areas with no footways with high pedestrian footfall and congested areas.

3.2.4 Receptors with moderate sensitivity to traffic flow, would include conservation areas, historical buildings, tourist attractions, and residential areas.

- 3.2.5 The Applicant's assessment classifies B Roads and any unnumbered/unclassified roads, away from residential areas as having low sensitivity except for those that pass through the Cotswold National Landscape (CNL). The assessment classes unnumbered/unclassified roads that pass through residential areas as medium sensitivity including PRow's.
- 3.2.6 The Applicant's assessment determined that there was not a large concentration of vulnerable users on the construction access routes from site observations and initial surveys and so did not identify the links on the construction routes as high sensitivity.

### Magnitude of Impact

- 3.2.7 **Written Representation, Appendix D (Transport Report) [REP1-172]** states that the applicant dismisses high percentage increases in HGV flow on rural links on the basis of low existing HGV flows, and does not take into account safety, but judges magnitude of impact on capacity only.
- 3.2.8 **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** defines magnitude of impact in Table 13-6. It explains that the magnitude of impact is not based only on capacity as summarised below.
- 3.2.9 None of the links on the construction access routes result in a 30% increase in traffic flows but eight of the links could see a 30% increase in HGVs and these were taken forward for further assessment which included the following.

### **Severance which is determined on change in traffic flows**

- 3.2.10 The likely effects of the Scheme in relation to severance have been considered in Paragraphs 13.10.36 to 13.10.38 in relation to the temporary construction phase for the Solar PV Panels and in Paragraphs 13.10.80 to 13.10.82 in relation to the temporary construction phase for the Cable Route Corridor of **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**. These were assessed in line with ISEP guidelines which relates to changes in all traffic flows, rather than only HGVs. As set out in the ISEP guidelines, severance is defined as "*the perceived division that can occur within a community when it becomes separated by major transport infrastructure*" that 'separate people from places and other people'. This relates, for example, to difficulties crossing roads or a physical barrier created by the infrastructure itself. The ability of pedestrians to cross a road is related to the relative gaps between vehicles. The presence of these gaps is not dependent on the classification of the vehicles and the change in HGVs is therefore not a relevant consideration in regard to severance.

3.2.11 As stated above, it is considered that there will be sufficient opportunity to cross the construction access routes with the addition of the construction traffic so the Applicant can only conclude that the significance of effect in relation to Severance is negligible. The impact is also temporary during the construction phase.

**Driver delay and non-motorised user (NMU) delay which are changes in traffic that could affect travel behaviour**

3.2.12 The effects on road driver and vehicle delay are considered minor/adverse. The **Outline CTMP [REP1-112]** and worker travel plan promotes travel outside of peak hours for workers and deliveries, and the absolute changes in vehicle numbers are unlikely to result in material delays. The impact is also temporary during the construction phase.

3.2.13 The assessment of the effects on non-motorised user delay acknowledges that there is no dedicated walking, cycling or equestrian infrastructure within the study area. It recognises that the resultant changes in traffic flow are unlikely to delay non-motorised users given:

- The low level of HGV trips per hour;
- There are passing points along all routes;
- Deliveries are outside of peak hours with none on Sundays;
- The **Outline CTMP [REP1-112]** includes measures in regard to passing vulnerable users including equestrians; and
- The impact is also temporary.

3.2.14 The whole PRoW network is assigned a medium sensitivity and so has a minor adverse impact on the basis that PRoW's generally remain open and vehicles will temporarily cross them during the construction period.

**Non-motorised user amenity which is based on pleasantness of journey affected by change in traffic flows; Fear and intimidation based on the ISEP guidance on step change in traffic and HGV composition**

3.2.15 When assessing the effects on non-motorised user amenity and fear and intimidation, **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** acknowledges that there is a low level of NMU infrastructure and observed a low level of NMU movements on the construction access routes. Using the ISEP guidance, the level of change in traffic flow does not result in a step change in the level of fear and intimidation.

- 3.2.16 It is acknowledged that the addition of HGVs to the network will affect the relative pleasantness of any NMU journey in the area. Given the low number of NMU movements the effects of construction vehicles on NMU amenity on the local highway network is considered to be minor. The impact is also temporary.
- 3.2.17 The whole PRow network is assigned a medium sensitivity and has a minor adverse impact on the basis the PRow generally remain open and vehicles will temporarily cross them during the construction period.

### **Road and user pedestrian safety based on collision history and traffic movements**

- 3.2.18 A review of Personal Injury Collision (PIC) records in the Study Area was undertaken in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**.
- 3.2.19 The PIC data over 5 years was obtained from Wiltshire Council with records compiled from STATS19 data provided by the Police and relate to all reported incidents, this includes all road users. Only 13 total collisions were recorded over 5 years on the links taken forward for further assessment. These included:
- Fosse Way – one collision was recorded with a single car as a result of black ice;
  - Alderton Road – no accidents were observed;
  - Bradfield Cottages – two accidents were recorded, both single vehicles.
  - Roundabout east of Hullavington – one accident included a non-motorised user; and
  - B4040 -3 accidents involving motorcyclists misjudging a bend.
- 3.2.20 The accident study included in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** also noted there were three accidents over 5 years at Fowlswick Lane / B4039. This route was not taken forward for assessment as the addition of construction vehicles did not increase traffic flows beyond the thresholds for assessment. It is nevertheless noted that this location is not regarded as an accident hotspot. A Solar Farm has already been constructed along Fowlswick Lane, with construction traffic routing via this junction with the B4039 route, with no effect on accident numbers.
- 3.2.21 As set out in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**, signage will be located here to warn drivers and riders of construction traffic. Given the above, the low levels of construction traffic

and that the construction period is temporary and less than the 5-year period the collision data was collected, the Applicant concludes that the likely effects of the increase in vehicle numbers including HGVs on road users and pedestrian safety is likely to be negligible.

### **3.3 Highway Code**

3.3.1 **Written Representation, Appendix D (Transport Report) [REP1-172]** sets out various points relating to the highway code and in particular construction vehicles/HGVs passing vulnerable road users.

3.3.2 Paragraph 7.8 states:

*“The highway code states that driver should allow at least 2.0m between themselves and pedestrians walking within the carriageway. If a pedestrian takes up around 0.5m of space on the lane and an HGV with a width of 2.5m must allow around a 0.5m gap between the edge of the vehicle and the other edge of the carriageway, the safe width for an HGV to pass a pedestrian is 5.5m (0.5m pedestrian width + 2.0m clearance between pedestrian and vehicle + 2.5m HGV width + 0.5m clearance between HGV and edge of carriageway). When the lane width is less than 5.5m, safe margins between HGVs and pedestrians cannot be achieved.”*

3.3.3 Paragraph 7.19 and 7.20 states:

*“Cyclists are also put at risk by HGVs on country lanes. The Highway Code states that cyclists should position themselves at least 0.5m from the edge of the carriageway. Figure 5.1 of the Local Transport Note (LTN1/20) indicates that a cyclist takes up around 1.0m of carriageway. Paragraph 163 of the highway code (10/04/2025) states:*

*‘give motorcyclists, cyclists and horse riders and horse drawn vehicles at least as much room as you would when overtaking a car (see rules 211 to 215). As a guide:*

*- Leave at least 1.5 metres when overtaking cyclists at speeds of up to 30mph, and give them more space when overtaking at higher speeds (Highway Code, para. 163).*

*The cyclist therefore, requires 3.0m (0.5m gap to kerb + 1.0m cycle width + 1.5m clearance to vehicle) to safely use a carriageway. An HGV has a width of around 2.5m and should leave at least 0.5m between itself and the edge of the carriageway. An HGV therefore takes up 3.0m of the carriageway width. The safe width to allow an HGV to pass a cyclist is therefore 6.0m (3.0m for the cyclist and 3.0m for the HGV).”*

3.3.4 In response the Applicant has set out the relevant elements of the highway code below:

- Rule 163 states:
  - Allow at least 2 metres of space and keep to a low speed when passing a pedestrian who is walking in the road (for example, where there is no pavement)
  - Leave at least 1.5 metres when overtaking cyclists at speeds of up to 30mph, and give them more space when overtaking at higher speeds
  - Pass horse riders and horse-drawn vehicles at speeds under 10 mph and allow at least 2 metres of space
- Rule 72 of the Highway Code states:
  - When riding on busy roads, with vehicles moving faster than you, allow them to overtake where it is safe to do so whilst keeping at least 0.5 metres away, and further where it is safer, from the kerb edge.
- Combining the results in the following widths:
  - Passing Pedestrians – 2m space + 0.5m pedestrian width + 2.5m HGV width = 5m road width
  - Passing Cyclists – 1.5m space + 1m cyclist width + 0.5m gap to kerb + 2.5m HGV width = 5.5m road width
  - Equestrians – 2m space + 1.5m equestrian width + 2.5m HGV width = 6m road width

3.3.5 Whilst these road widths are available at various points along the construction routes the **Outline CTMP [REP1-112]** includes text to advise drivers to adhere to the Highway code and drive carefully and give way where required.

3.3.6 Additional text in the **Outline CTMP [REP1-112]** includes advice for drivers when meeting Equestrian users including:

- All drivers will receive a site induction, including on the following matters:
  - Awareness of horse rider behaviour when encountering horses;
  - Slow to <10 mph;
  - Avoid revving engines;

- Do not overtake unless signalled by rider; and
- Stop engine where necessary.

### 3.4 PRow Measures

3.4.1 In Paragraph 2.17 of Appendix D it states:

*“The Outline Public Rights of Way and Permissive Path Management Plan provides no specific mitigation for the PROWS in the vicinity apart from the proposal to temporarily divert PRow MALW54 at Access 18 (south-eastern side of A429).”*

3.4.2 The PRow network is assigned a medium sensitivity and has a minor adverse impact on the basis the PRow generally remain open and vehicles will temporarily cross them during the construction period.

3.4.3 **The Outline Public Rights of Way and Permissive Paths Management Plan (PRowPMP) [REP1-104]** outlines the below management measures for all PRows:

There are 29 PRow that cross the Solar PV Sites. Generally, these will remain open throughout the construction period. Where vehicles are required to cross one of these PRow, the following measures will be implemented during the construction phase:

- The provision of banksmen to hold vehicles if a PRow user is present and advise PRow users of the potential for construction vehicles to be present;
- Wider access tracks to be used where possible to ensure vehicles can pass PRow users safely;
- Speeds to be limited to 5-10mph;
- Drivers will stop and give-way to any PRow user that they encounter;
- Appropriate signage will be installed along the PRow to make PRow users aware of the construction activity. This will include information on construction times and contact details for a public liaison officer;
- The PRow will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so;
- Any damage to the surface of the PRow will be repaired as soon as practicable. The surface will be returned to its original condition following completion of construction.

### 3.5 HGV Trip Generation

- 3.5.1 **Written Representation, Appendix D (Transport Report) [REP1-172]** provides commentary on the trip generation. Whilst some of this has been responded to within the general Stop Lime Down written responses, this section responds to the calculations set out in Appendix D.
- 3.5.2 The **Outline CTMP [REP1-112]** provides estimated construction timetable and numbers. The **Outline CTMP [REP1-112]** construction programme and HGV trip generation figures are derived based on design layouts from the applicant provided to a contractor to estimate numbers. The construction timetable and trip numbers are subject to change and will be confirmed in the final CTMP(s). This is because a tender process will be carried out at a later date and relevant contractor appointed.
- 3.5.3 The **Outline CTMP [REP1-112]** figures include the following buffers applied by the Applicant:
- A 50% uplift on construction trip numbers;
  - Assumes a worst case peak day occurs every day of the two-year construction period;
  - Assumes all Solar PV Sites and the Cable Route Corridor are constructed concurrently, when in reality the construction programme will look more like that submitted in the **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** where some sites start or finish at different times in the phase;
  - Assumes all cable access junctions will be in operation concurrently when it is likely that over the whole route only four will be operational at any one time;
  - Assumes all cable access junctions will be in operation for the full duration of the construction phase when actually they are likely to be in operation for approximately 90 days over the construction phase.
  - Assumes a peak worker trip occurs every day of the construction period and all Solar PV Sites and the Cable Route Corridor are built out concurrently over the construction phase;
  - Assumes that every access track will be constructed with aggregate even though a large proportion of tracks between Solar PV Panels will be left as grass tracks with matting;
  - Assumed standard containers for the Solar PV Panels (500 per container) instead of high cube containers which carry more modules (720 per container);

- Includes an allowance for HGVs taking spoil away from the Order Limits, even though it is planned that the majority of spoil will remain on the Site;

3.5.4 The Stop Lime Down calculations were set out under the following headings:

- PV modules;
- Waste;
- 33 kV Conversion Units;
- Cable for PV sites;
- 400KV substation;
- 132kv substation;
- BESS, Access Tracks;
- General (fencing, landscaping, etc);
- Compounds;
- Topsoil stripping; and
- Highway Improvement Areas.

3.5.5 Table 3-1 below provides comment on each of the calculation categories.

**Table 3-1 Stop Lime Down Calculations**

Item	Comment
PV Modules	The Applicant's calculations make an allowance for 600,000 Solar PV Panels (1,200 delivers with 500 panels per HGV). This could be as much as 864,000 Solar PV Panels based on the use of a 40 ft High Cube container which can accommodate 720 modules per HGV. This would result in a density of 1,842 modules per hectare (based on 469 hectares). The Stop Lime Down calculations would result in 2,154,240 Solar PV Panels which exceeds every other 500 MW DCO Application.
Mounting Structures	The Applicant's assessment of mounting structures is derived from data provided by a contractor based on indicative design layouts. The 50% uplift used within the Applicant's calculations would more than account for any increase in modules using 40ft High Cube containers.

Item	Comment
Waste	The Stop Lime Down calculations underestimate compaction of waste. A compactor will be provided on site to increase weight per vehicle of waste transported from the Order Limits. The calculations included in the Applicant's general construction calculations also make an allowance for general waste associated with compounds/construction activity.
400kV Substation	The indicative size of the 400 kV Substation shown in Annex A of Appendix 3-1 is 38,037 m <sup>2</sup> . The whole area would not need to be surfaced.
132kV Substation	The indicative size of the 132 kV Substations shown in Appendix 3-3 is 3,455 m <sup>2</sup> . The whole area would not need to be surfaced.
BESS	The size of the BESS Area is shown indicatively in Annex A of Appendix 3-1 is 27,096 m <sup>2</sup> . The whole area would not need to be surfaced with aggregate.
Access Tracks	It is unlikely that all internal access tracks will be built out. Aggregate is only likely to be provided on main internal access tracks. The more peripheral tracks will either remain as grass tracks or be constructed from aggregate left over from the construction compounds and used by 4x4 vehicles for maintenance purposes during the operational phase. Therefore, a significant allowance for aggregate has been included within the Applicant's calculations.
General Fencing and Landscaping	The Applicant's calculations for General construction activities also include HGVs associated with compounds and spoil. The direct reproduction of these numbers in the Stop Lime Down calculations results in double counting if the separate compound and soil calculations provided by Stop Lime Down are included.
Compounds	Each compound area indicatively is approximately 50 metres x 50 metres.  An allowance for compounds areas is included in the Applicants general construction calculations.

Item	Comment
	<p>A proportion of the aggregate used in the construction compounds can be kept on Site and reused for access tracks.</p> <p>The Stop Lime Down construction compound numbers therefore represent a significant overestimation.</p>
Topsoil Stripping	<p>An allowance for topsoil removal is included in the Applicant's general construction calculations. Spoil will only be transported off-site if it is contaminated. This is unlikely given the existing agricultural use of the land.</p>
Highway Improvements	<p>Highway improvement will be implemented prior to commencement of the construction phase as they are provided to facilitate the construction traffic and any HGVs associated with this are well within the peak flows in the ES</p>

### 3.6 SLD Appendix Y (Lime Down Public Rights of Way Survey) Questionnaire [REP1-187]

3.6.1 A NMU survey was included in **Written Representation, Appendix Y (Lime Down Public Rights of Way Survey) [REP1-187]**, although this was not referenced in **Written Representation, Appendix D (Transport Report) [REP1-172]**. This provides 160 responses to a questionnaire survey that was issued to supporters of Stop Lime Down and on social media. There are a number of key issues with the validity of this survey:

- The survey was freely open and there is no evidence of any measures being put in place to prevent respondents from responding multiple times in order to inflate the results;
- Similarly, there is no indication provided of whether any of the reported trips are made together by multiple respondents, which would reduce the overall number of passing movements required;
- The implication is that the survey shows many users of the various PRow. However, no assessment has been given of the actual number of users on an average day based on the responses provided. For example, 30 respondents referenced using Fosse Way, but when factoring in the stated frequency of use, this amounts to less than 12 movements per day on average;

- Many of the respondents reference a number of different routes used, but only a single frequency of use is provided. This again overinflates the usage in reality when examining each individual route, as it seems unlikely that all of the routes mentioned would be used during every trip. Therefore, if someone were to count the total number of responses for each route it would amount to double counting; and
- Many of the respondents reference multiple modes by which they use the routes, but only a single frequency of use is provided. Clearly, it would not be possible for users to ride a horse and cycle at the same time for example, so if someone were to consider the number of responses for these modes, it would amount to double counting.

3.6.2 The Applicant has carried out its own NMU surveys on Alderton Road, Fosse Way, and unnamed route opposite the Street at Hullavington and Rodbourne, and will undertake further surveys in summer months.

## 4 Summary and Conclusion

- 4.1.1 This Technical Note responds to the transport concerns raised by Stop Lime Down in Appendix B of **Comments on submissions received at deadlines 1 and 1A [REP2-051], Written Representation, Appendix D [REP1-172] and Written Representation, Appendix Y [REP1-187]**.
- 4.1.2 The Technical Note has explained that:
- The Applicant's construction traffic assessment is based on contractor information and conservative assumptions, including a 50% uplift in HGV movements, assumptions around peak activity occurring daily, and assumptions that multiple areas and access points could operate concurrently.
  - The alternative calculations presented by Stop Lime Down either overstate likely activity, rely on incorrect assumptions, or result in double counting.
  - The likely effects of routeing, highway safety and non-motorised users during construction would be temporary and managed through the **Outline CTMP [REP1-112]**, booking and monitoring systems, passing places, banksmen, driver induction and that sensitivity of links in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** have been appropriately assessed.
  - That PRoW would generally remain open and that appropriate measures would be in place where construction traffic crosses or interacts with those routes.
- 4.1.3 Overall, the Applicant considers that the transport assessment remains robust and suitably precautionary. The evidence presented in this note demonstrates that the construction trip generation forecasts include substantial built-in flexibility and that the concerns raised by Stop Lime Down do not identify a material omission that would alter the conclusions of the assessment. Any transport effects arising during construction would be temporary in nature and would be controlled through the final CTMP(s) and associated mitigation measures. On that basis, the Applicant considers that the likely construction traffic effects of the Scheme are acceptable.

## 5 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 June 2026].