

Application by Lime Down Solar Park Limited for an Order Granting Development Consent for Lime Down Solar Park (EN010168)

Hullavington Parish Council - [REDACTED]

Response to the Applicant's Written Summary of Oral Submissions at Open Floor Hearing 2 and Applicant's Responses (Document 9.52)

Submitted by: Hullavington Parish Council

Represented by: [REDACTED]

1. Introduction

Hullavington Parish Council has reviewed the Applicant's responses contained within Document 9.52 following Open Floor Hearing 2.

The Parish Council considers that the Applicant's response does not fully address the substance of the parish-specific evidence presented during the Examination. Whilst the response frequently refers the Examining Authority back to previously submitted application documents and Environmental Statement chapters, it does not explain why the detailed local evidence submitted by Hullavington Parish Council does not alter the Applicant's conclusions.

The following observations are therefore respectfully submitted for the Examining Authority's consideration.

2. Completeness of the Evidence Base

A significant procedural issue arising from Document 9.52 concerns the completeness of the transport evidence.

In response to **DL-003** (Document 9.52, page 29), the Applicant states:

"The Applicant is in dialogue with Wiltshire Council and SLD consultants to try to agree a position and way forward in relation to construction trip numbers."

The Applicant further states:

"Further information on trip generation will be submitted to the Examination at Deadline 5."

The Parish Council notes that these statements indicate that the construction traffic evidence underpinning the Applicant's assessment remains under review.

While it is recognised that additional information may appropriately be submitted during the Examination, the Parish Council considers that conclusions regarding transport impacts should be treated with appropriate caution until the revised evidence has been submitted, consulted upon and tested through the Examination process.

The Parish Council respectfully submits that it is difficult to reconcile definitive conclusions regarding transport impacts with an acknowledgement that the underlying construction traffic evidence is still being revised.

3. Failure to Address Parish-Specific Evidence

Throughout Document 9.52, the Applicant frequently refers the Examining Authority to previous application documents and responses to Relevant Representations.

The Parish Council does not dispute that these documents contain assessments of the Proposed Development.

However, the issue raised during the Examination was not whether these documents exist, but whether the Applicant has adequately considered the detailed evidence submitted specifically in relation to Hullavington.

This includes evidence concerning:

- the settlement pattern of Hullavington;
- the character of the local rural highway network;
- pedestrian safety;
- construction impacts;
- cumulative effects on the village; and
- community wellbeing.

Simply directing the Examining Authority back to previously submitted documents does not explain why the parish-specific evidence presented during the Examination does not alter the Applicant's conclusions.

The Parish Council therefore considers that the Applicant's response does not directly engage with the substance of the evidence submitted.

4. Walk 8 and Pedestrian Safety

The Applicant's response to **DL-003** (Document 9.52, page 28) acknowledges a number of the physical characteristics identified by the Parish Council.

The Applicant states that:

"This stretch of road has no footway and, under the railway bridge, limited verge width."

The Applicant also acknowledges:

"Pedestrian users already walk on the road and use the verge to step off the road for large vehicles passing."

These statements reflect the evidence presented by Hullavington Parish Council during the Examination.

However, the Applicant also states:

"This route has not been specifically assessed."

Instead, the Applicant concludes that another Public Right of Way provides:

"a more accurate proxy."

The Parish Council respectfully submits that this does not constitute a location-specific assessment of Walk 8.

The acknowledged physical constraints, including the absence of a footway, restricted visibility beneath the railway bridge, limited opportunities for pedestrians to obtain refuge and the interaction between pedestrians, cyclists and construction traffic, are unique to this location.

The Parish Council therefore considers that reliance upon a proxy assessment of another route, together with assumptions regarding compliance with construction traffic routing arrangements, does not demonstrate that the specific characteristics of Walk 8 have been adequately assessed.

Accordingly, the Applicant has not demonstrated why the acknowledged physical constraints would not give rise to a significant adverse effect on pedestrian safety.

5. Construction Traffic

The Applicant concludes that construction traffic impacts would not be significant.

However, as noted above, the Applicant also confirms that construction traffic generation remains under discussion and that revised information will be submitted during the Examination (Document 9.52, page 29).

The Parish Council respectfully submits that the significance of transport impacts cannot be fully evaluated until the revised construction traffic forecasts have been submitted and independently examined.

The Parish Council therefore requests that appropriate weight be attached to the evolving nature of the transport evidence when considering the Applicant's conclusions.

6. Community Wellbeing

During Open Floor Hearing 2, [REDACTED] referred to the Applicant's own assessment acknowledging that Hullavington is among the communities most affected by the Proposed Development.

In response (**DL-004**, Document 9.52, pages 29–30), the Applicant states that amendments to the Environmental Statement:

"do not give rise to any change in the likely significant effects."

However, the response does not explain why the acknowledged long-term changes to the character of Hullavington and residents' quality of life do not amount to significant adverse effects.

Rather, the response reiterates the Applicant's conclusion without addressing the Parish Council's concern regarding the reasoning underpinning that conclusion.

The Parish Council therefore considers that this matter remains insufficiently explained.

7. Rural Road Safety

The Applicant states that construction traffic will avoid Hullavington village centre.

The Parish Council acknowledges this statement.

However, this does not address the concerns raised during the Examination.

The principal concerns relate to the Norton road towards the A429, the railway bridge, and the wider rural highway network used by pedestrians, cyclists, school children and elderly residents accessing local services and public transport.

The Parish Council also draws the Examining Authority's attention to the particular challenges associated with leaving Hullavington at its northern end. This section of highway is constrained by visibility of on-coming traffic on a derestricted road and the absence of continuous pedestrian infrastructure. Both motorists and active travellers are required to negotiate these existing constraints daily. The Parish Council considers that the introduction of additional construction traffic has the potential to increase conflict between road users at this location and that the Applicant has not demonstrated, through a location-specific assessment, why these effects would not be significant.

Avoidance of the village centre does not demonstrate that these constrained sections of highway can safely accommodate the predicted construction traffic.

The Parish Council further notes that these routes are regularly used by both school transport and scheduled bus services. School buses serving Hullavington travel along Norton Road in both directions during the morning and afternoon school travel periods, including towards the A429 and towards Norton and Foxley before returning along the same routes later in the day. In addition, the scheduled bus service between Chippenham and Hullavington also uses Norton Road towards the A429.

These services operate at times when local traffic levels are already elevated and when children and other passengers are boarding or alighting from buses. The Parish Council considers that the interaction between construction HGVs, buses, private vehicles, pedestrians and cyclists on these constrained rural roads warrants specific consideration.

The Parish Council therefore considers that these parish-specific concerns remain unresolved.

8. Conclusion

Hullavington Parish Council respectfully submits that the Applicant's response contained within Document 9.52 does not fully engage with the parish-specific evidence presented during the Examination.

In particular, the response:

- relies extensively on references to previously submitted application documents rather than addressing the detailed evidence presented by Hullavington Parish Council;
- reaches conclusions regarding transport impacts while confirming that elements of the construction traffic assessment remain under review;
- relies on a proxy assessment rather than a location-specific assessment of Walk 8; and
- does not adequately explain why the acknowledged changes affecting Hullavington would not result in significant adverse effects upon the local community.

The Parish Council respectfully requests that the Examining Authority give appropriate weight to these matters when considering the Applicant's evidence.

In particular, the Parish Council considers that the Applicant's conclusions relating to transport impacts, pedestrian safety and community effects should be treated with

appropriate caution until the revised transport evidence has been submitted, consulted upon and fully examined during the remainder of the Examination.

Respectfully submitted

[REDACTED]

Chair

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