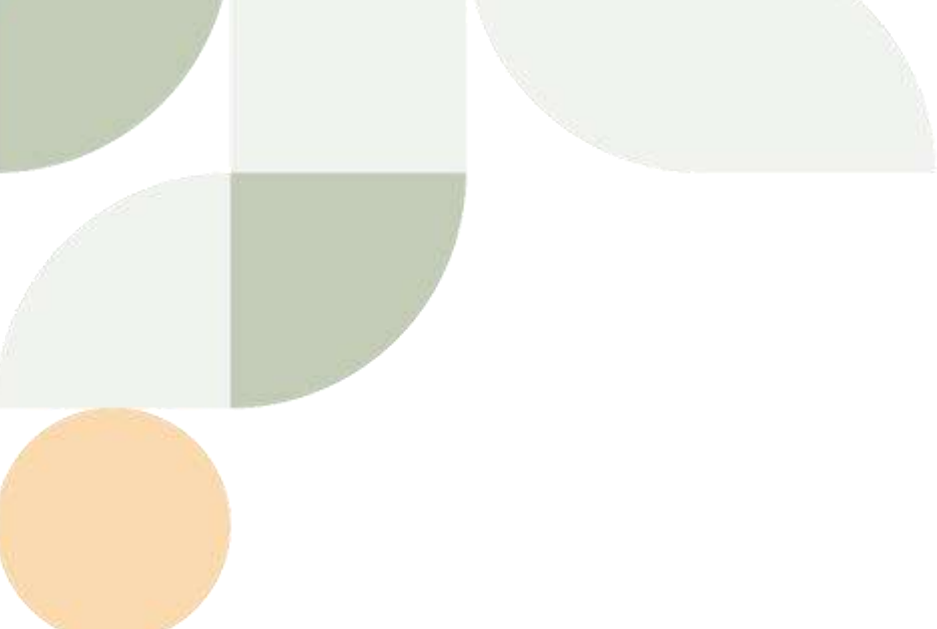




Lime Down

Solar Park

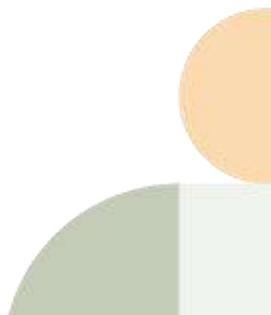
Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 6 and Responses to Action Points

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1 Summary of Oral Submissions at Issue Specific Hearing 6

Agenda item	Comment
1. Welcome and Housekeeping	The ExA introduced the hearing and made some preliminary remarks. The purpose of the hearing is to address matters raised by the ExA following its consideration of the application documents in respect of matters relating to landscape and visual impact, glint and glare, cultural heritage, and hydrology, flood risk and drainage. The following parties then introduced themselves during ISH: The Applicant: Claire Brodrick, Partner at Pinsent Masons LLP Will Threlfall, Project Development Manager at Island Green Power James Darrall, director at Transport Planning Associates Wiltshire Council: Odette Chalaby, Barrister David Lear, Highway Development Control Team Kim Corps, Head of Service, Transport Policy and Strategy Kevin Cheleda, Highway Development Control Team Kate Tate, Arboricultural Officer Lisa Price, Agricultural Officer

	Stop Lime Down: David Kozelko, Barrister Bruce Bamber of Relton TPC Limited
2. Construction HGV numbers	The ExA asked the Applicant to share the ES Volume 3, Appendix 13-1 Transport Assessment [APP-233] pages 905 to 954. Table 13-12 and Annex E of that document identified the number of solar modules to be delivered to the solar sites at 588,988. This is to be delivered in 500 modules in regular 40-foot containers equating to 1,178 HGV deliveries. The latest ES Volume 3, Appendix 13-1 Transport Assessment [REP6-015] states the same number but 842,500 modules. The ExA asked the Applicant to explain how the figure increased in the same 1,200 high cube deliveries. Claire Brodrick stated that the information used in the original ES Volume 3, Appendix 13-1 Transport Assessment [APP-233] that was submitted by the Applicant as part of the DCO application was based on information provided by contractors and was typical of the figures being used on other schemes of this nature. The position had evolved as more schemes went forward through to actual construction. The comments made by Wiltshire Council and Stop Lime Down were taken into consideration and to ensure the Applicant was not underestimating the potential movements for the Scheme, the Applicant undertook an exercise to review all figures and determine what could be the maximum number of components that could be accommodated within the site. Since the DCO application was submitted, new forms of panel array layouts had also come onto the market with 2-panel and 3-panel system layouts. When the Applicant was trying to put together what it considered to be the maximum amount of components, it went with the biggest number it could conceive for any of the given elements. Ms Brodrick further stated that when reviewing these figures, it took into account the footprint of the development, how many panels could potentially be located within that footprint to identify the maximum parameters that the Applicant could in order to address some of the concerns that had been raised about underestimating the components. Ms Brodrick noted that the Applicant has not completed the detailed design, the numbers are based on indicative information, and the Applicant is trying to ensure the

	maximum feasible parameters are assessed to give comfort to Wiltshire Council and the interested parties that the Applicant has assessed the reasonable worst case. The ExA referred to the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] and Section 2, which is the Applicant's response to Stop Lime Down's Written Representation, Appendix D (Transport Report) [REP1-172]. The ExA noted that page 2 of the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] showed the number of HGV deliveries made per hectare of the works number 1 area for Lime Down, compared with other solar farm DCOs (IGP schemes), and that the number and ratio of deliveries were less than half of the other site. The ExA queried the HGV numbers from other schemes and that these were a like-for-like comparison with the Scheme. The ExA asked if Table 2-1 could be rerun with the waste figures taken out of the Scheme figures, as the ExA had concerns that these were included in the other IGP trip calculations. The ExA asked the Applicant to confirm whether the site area shown in the table for the other 3 IGP schemes were the solar PV planting areas only or the entire Works Number 1. Ms Brodrick explained that the colour for that particular work number is a solid blue coloured on the Works Plans. The Works Plans for the other projects had similar elements of Work Number 1, which is the solar panels themselves and the converter units, and excluded the inter array cabling. Work Number 1 covers a very large area for all those projects because it includes inter array cabling. The Applicant removed the inter array cabling area as it can vary considerably and the Applicant wanted to ensure a fair comparison between the schemes for the work numbers at 1 to C, which is the equivalent. Ms Brodrick explained that this was a fair comparison in terms of the work numbers used. In terms of the confidence in the HGVs, Mr James Darrall explained that the figures do include waste which was in the calculations for Cottam and West Burton. The ExA asked the Applicant how they
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	accounted for the statement in Green Hill, which stated it relied upon Cottam, which in Cottam stated that waste was not actually included with mounting structures and solar panels. Mr Darrall explained that the calculations in the spreadsheets included waste in the same row but had been taken into account. In response to comments from interested parties and the ExA, Ms Brodrick noted that the extent of the panel areas had only changed where the Applicant had removed panels during the course of the Examination. There had been some adjustment to the figures where they had taken out some panels. There had been a reduction since the DCO application was submitted because the Applicant removed panels from Field A, for example. The Applicant confirmed it would identify how many hectares of Work No. 1(a),(b), and (c) would equate to and record this in both the Design Principles and Parameters and Outline Construction Environmental Management Plan. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 1 in the Actions Response Table below.</i> When asked by the ExA about how the numbers of panels were calculated, the Applicant explained that the number of panels in each area are not neat rectangles or squares, they were irregular with some being uniform, and others long and narrow. The number of panels is not the total area divided, but rather how many panels that can possibly fit within these areas. The detailed design is yet to be completed and there are many other factors that could result in fewer panels. The ExA asked why that exercise was undertaken during Examination and not before submitting the ES Volume 3, Appendix 13-1 Transport Assessment [APP-233]. Ms Brodrick explained that the 3 Panel design was not available in the market when this transport assessment was being done. Technology had moved on and what is being considered now as being suitable design measures was not envisaged at the point that the transport assessment was carried out.
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The **ES Volume 3, Appendix 13-1 Transport Assessment [APP-233]** was carried out based on an indicative design based on information provided by contractors that had been used. Further work is continuing to take place and Island Green Power as an organisation are in the process of building out West Burton, and is receiving more information as a result of having contractors appointed on that Scheme and providing more detailed information that was not available at the point that Cottam and West Burton were going through the DCO process, and when the Transport Assessment for the Scheme was being undertaken. Mr Darrall undertook the **ES Volume 3, Appendix 13-1 Transport Assessment [APP-233]** based on the information that he was provided with, which was considered to be indicative and suitable at the time. As a result of this exercise, the Applicant had interrogated that information more thoroughly. The Applicant had utilised the more detailed information that came out of contractor information being provided on other schemes.

The ExA issued an action for the numbers in Table 2-1 of **Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107]** to be re-run.

Post Hearing Note:

Please refer to the Applicant's response to Action 2 in the Actions Response Table below.

The ExA queried the number of 1200 for HGV deliveries, and that the 3P panels were not mentioned anywhere in other application material. Ms Brodrick noted that the Applicant was trying to look at what was the possible maximum number of panels that could be accommodated within the area. Mr Threlfall further added clarity, stating that the difference between the 2P and 3P panels is to do with how many are laid in portrait on one row. The work area, solar PV arrays and parameters are not increasing. What the Applicant would look to do, if they just take one area and want to look for the most efficient design between 2P and 3P, 2P allows for two panels on top of each other. But one could gain an extra tilt in a row, and would feasibly be able to fit more rows in because they're shorter in length from the bottom to the

	top, to get more rows. The 3P increases the depth per row, but would reduce the number of rows per land parcel but the aim is to look for what is more efficient. Mr Threlfall further added that with topography, it might be that extra PV irradiance is gained from doing it with two panels with a slightly higher tilt in the row. Alternatively, if the tilt is dropped, which theoretically, per panel, drops the irradiance level ever so slightly. If a third panel was placed in that row, that then potentially gives more generation. It is the tilt that adjusts within the defined parameters eg. 3.5m for max AGL for fixed panels, which is how the Applicant can fix it in there. The 3P mounting structures, the design and the various electrical stringing, that goes into the background, that is what's come forward most recently within the industry. As part of this exercise, what the Applicant has done is apply a 3P design across the entire site. That does not factor in the fact that the Applicant has lost some fields, or the fact that the Applicant has committed to using tracker panels in certain areas for glint and glare, for example, nor factors in various design implications such as north sloping topography which lessens the efficiency of 3P. So this is an indicative design. Mr Threlfall explained there is a mathematical calculation that has been used by SLD to try and work out panel numbers and those numbers, which are not mathematically disputed, but they've not been done using a design tool which factors in all various considerations, hence why there is a difference between 842k or 900k, because the mathematical calculation would give more. But the difference between the design doesn't alter anything, only that there can be less rows but more panels per row. It doesn't change any of the design parameters. It came forwards and the Applicant felt as if it was the way to gain the absolute maximum number of panels to possibly use for the design to help inform things. That maximum design fits within the parameters of what the Applicant has done with the transport numbers because of the buffers applied. Mr Threlfall further noted that the 3P design is the way to achieve the highest amount of panels and associated infrastructure that is needed, including cabling. The design provides a worst-case scenario to help inform all of this. The fields that have been removed from the scheme design A1 & C9 total 20
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	hectares. The work numbers will be slightly smaller than that and the Applicant will come back and check what they are. The ExA asked whether the 749 hectares is everything that would be in the red line, to which Mr Threlfall confirmed. The ExA asked whether 385 is the blue oblongs, to which Mr Threlfall also confirmed. Ms Brodrick stated that the fields are linked and there is cabling between them to include the 469. Some areas of Work Number 1 include underground cabling, which is why work number 1 is a much larger number. 749 included the habitat areas. If there is a comparison between the number of HGV movements linked to the number of solar panels, then the area to utilise for the comparison is just the areas that you can put the solar panels on. The same exercise was done for the other solar DCOs and they include much larger areas for this particular work number. The ExA asked if the Applicant had done an initial design layout of the panels or rather a percentage reduction, to which Mr Threlfall stated that the Applicant had done a realistic design with the 3P fixed panels in south facing rows. They would be on an east-west axis. The fields in question do a north-west to south-east divide so that takes away certain areas in locations and the rows are divided in there and that is the biggest contributing factor to how the Applicant had got different numbers to SLD. Mr Threlfall explained that if turned into exact squares, there could be more panels. The ExA asked if alternatively the Applicant could measure the entire area as a regular rectangular shape and then apply a percentage reduction. Mr Threlfall stated that that is not what they have done and that they have a design using the tool to physically design the schemes. Mr Bamber commented stating that on the table in the Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107] comparison the works number one area had not been adjusted and is not on a like-for-like basis, to which the ExA asked the Applicants for clarification. Ms Brodrick stated that the numbers previously referenced was her understanding for the equivalent work numbers. Mr Darrall stated that those numbers are for the works one area (blue area) and are comparable. The Environmental Statement is different, and it is just the wording. Ms Brodrick further noted that those figures may have been given in those projects which is why Mr Bamber had been able to
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	use the correct figure from the outset. Those figures were listed in those documents so were taken out but phrased slightly differently. Mr Bamber queried the number of panels with a 3P layout compared to a 2P layout and whether it referred to density, to which Mr Threlfall confirmed and noted that the spacing and shading can be affected by topography, so the Applicant had reached the maximum case design and build the most dense layout to provide the most infrastructure with the most amount of panels to inform the situation. The ExA asked the Applicant to confirm that the worst case scenario is a 3P layout not a 1P or 2P layout on the site area, to which Ms Brodrick confirmed, and stated that the Applicant had completed that exercise for getting the maximum parameters for the ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014] and as identified, in order to be consistent across the suite of documents, the Applicant reran the climate change numbers using the same figure to ensure the assessment information was consistent. The ExA noted the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] showed a total HGV trip generation 34% higher than originally estimated, and displayed Mr Bamber's D6 submission (Transport Submission – Additional Submissions – Accepted at the discretion of the Examining Authority [AS-028]) table 1, showing the revised HGV numbers broken down into component parts, to which Mr Darrall stated that for the mounting structures the difference is previously getting information directly from the contractor, including estimations, but now the Applicant went directly to the supplier, which is normally what would happen at the detailed design stage, which the Applicant has an NDA with, which means the Applicant cannot provide this to Stop Lime Down at present. The ExA asked why there was an NDA on the numbers, to which Mr Threlfall responded that between the design team, IGP and manufacturing suppliers, they would provide the Applicant with new information on new products. With major contracts on the line, the Applicant has NDAs in place, which means they are
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	unable to share information. Wiltshire Council wanted to see evidence. The Applicant reached out to two suppliers regarding panels and how many panels can fit on a high cube container and both of these manufacturers advertise 720 panels per container. The Applicant only got permission yesterday to share that specific information about panels per container, provided there was a confidentiality clause with the other party. The Applicant confirmed it would talk to Stop Lime Down about how to do that to show Mr Bamber this information. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 3 in the Actions Response Table below.</i> Ms Chalaby noted that some information was received yesterday but that they had not had time to review it, to which Mr Threlfall stated that the numbers had been shared with Wiltshire Council. The specific evidence from the manufacturer about mounting structures has not been shared because of the NDA issue. Mr Darrall noted the weightings of the front and rear footings for the mounting structures were included in the Applicant's analysis. The previous run of the numbers looked at a smaller footing, but the manufacturer had stated that it's a heavier and bigger footing made of concrete, that is now included in the calculations. Further, waste packaging has gone up because there are more panels. With respect to general access tracks and BESS and 132kV substation, the numbers are similar to before but changed in terms of the amount of detail provided. For example, with the 132KV access trackers, the Applicant is using the UKPN guidance for access track depth and width and construction. With compound surfacing and compound other trips, the Applicant has increased the size of the compound to match Stop Lime Down. Where possible, the Applicant has adopted assumptions that Stop Lime Down have adopted, for instance on Spoil.
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Mr Darrall further noted that the plan on other sites that are being built out on is to keep the spoil on-site, and the Applicant has allowed 10% taken off site just in case some of that material needs to be taken off-site. If the access tracks are dug up, the soil next to the access tracks would be spread out for the BESS and the other compound areas. There will be a bund and some of the soil will be stored in there. There will be stockpiles of soil, as set out in the **Outline Soil Resources Management Plan [REP6-035]**. For the 33KV units, the Applicant underestimated the number of trips there. Previously the Applicant had a plan showing the areas where the units would be, up to two in each area, but the Applicant assumed one per area, it has now been changed. For the conversion units and foundations, the Applicant added further detail to provide trips to deliver foundations for those areas. Additionally, 132KV substations were added, there was an aggregate depth of 0.3 and concrete at a depth of 0.5. There are other trips associated with the substation as well, that is why the figure is so vastly different from what was originally assumed.

The ExA asked the Applicant why the figure was so vastly different, to which Mr Darrall stated that the figure was so vastly different because it includes concrete which is heavy and requires more trips. Concrete was not assumed before because there was no detailed design. Mr Darrall continued to note that with all the other schemes, there were buffers to account for the fact that it did not include the detailed design stage, including 50% and an annual average daily traffic assumption, which is the construction trips that happen every single day for the construction period. Mr Darrall thanked Wiltshire Council and Stop Lime Down for this and noted that the buffers included previously are not relevant now because they have more detailed information.

The ExA asked why the relevant tables in the **ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014]**, **ES Chapter 13 Transport and Access [REP4-014]** and the **Outline Construction Traffic Management Plan [REP6-041]** had not been updated as they still contain the original numbers of panels. None of that has changed since **[REP5-107] (Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission)**. Mr Darrall noted that the Applicant received a late submission document last week which had the comments. There was a meeting at the beginning of August about the revised trip generation with Stop Lime Down and a response at the beginning of September with notes on that. There was also a meeting with Mr Lear from Wiltshire Council about the trip generation assumptions

	midway through August with notes, received on 9 September which was a late submission. The Applicant was hoping to do it before this hearing to agree the numbers and update the reports. The Applicant didn't think it was helpful to put in numbers that were not yet agreed and looking at the list, most are agreed with Wilshire Council, more than with Stop Lime Down. The Applicant confirmed it would update these for Deadline 7. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 20 in the Actions Response Table below.</i> Mr Kozelko asked whether the Applicant's change of position was the change from 1P/2P to 3P or because the design underlying this had changed, to which Ms Brodrick stated no, that the original number was based on the indicative design, and then for the purposes of this exercise, the Applicant reran the design to see the absolute maximum number of panels that could fit in if used on the 3P design. The 3P solution contributes to that, and how many to possibly put in. The ExA asked whether the indicative design was ever run on a worst case, and whether the Applicant was always going to be underestimating numbers on the indicative design, to which Ms Brodrick stated that the original figure was based on an indicative design. However, based on the assumed panel technology changes and wattage that would be available when the Scheme was constructed, the Applicant reran the exercise looking at what is currently available on the market, which is a 3P design, slightly larger panels, but within the parameters that have been assessed in terms of what is the maximum out there at the moment. Mr Bamber asked about the specification used to arrive at the numbers in the table, to which Mr Threlfall stated that in terms of evidence that the Applicant would like to provide was received from a supplier. E.g. the high cube container information included the data sheet of a panel, which is used to inform the design.
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	It also contained things on how it can be delivered. The Applicant wants a mechanism to share that with Stop Lime Down so they can say that they have seen it and are happy with it. The ExA asked whether the information could be submitted into examination in a confidential manner, to which Ms Brodrick stated that if it were not published and there was an NDA, then it could be helpful, but its only allowed in limited circumstances. Alternatively, the Applicant could see whether Mr Bamber in his professional capacity would commit to confidentiality and see it and not share it widely. On comments made by Mr Lear on the Applicant's ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014] and HGV movements being understated, noting container capacity, mounting structure deliveries and on-site spoil retention, Mr Darrall stated that the difference between the panels (508 and 842) was because one is a 2P and one is a 3P, the mounting structure itself does not increase. The mounting structures and the information received from the manufacturer tells them how they are packed, which the Applicant has used. There won't be much variation in that. The use of High cube containers for panels is what was used on other sites as well. Mr Darrall further explained that with the information from the NDA will clarify the panel and mounting structure issue. In respect of spoil, the Applicant assumed 10% is going off-site, and the plan is to keep spoil on-site as much as possible. There are a lot of what-if scenarios. The plan is to keep it all on-site. Ms Brodrick explained that the parameters shown are what the Applicant is using for the purposes of the assessment. The final Construction Traffic Management Plan will set out the actual numbers as they are known once the detailed design has been fixed and the suppliers and contractors have been selected. The figures that the Council will receive for approval in that final plan will be based on the actual Scheme that is going to be built out. When the Applicant submits that plan for approval, it will need to confirm any material differences from the Environmental Statement. For example, if the percentage of spoil removal was greater, the Applicant would need to explain that and how it would achieve this without any new or material effects. It would need to fit within the parameters that were originally assessed. Mr Darrall had tried to reach a compromise to reach an agreed position for the purposes of the DCO application. The Council will have final sign off on the final numbers, which will be dealt with at the discharge.
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The ExA stated that there should be more explicit control required in the section of the **Outline Construction Traffic Management Plan [REP6-041]**, so there is no optionality or suggestion in respect to 'high cube containers with a capacity of at least 720 modules per HGV should be used where required'. The ExA asked that this to be an action for this to be revisited.

Post Hearing Note:

Please refer to the Applicant's response to Action 4 in the Actions Response Table below.

In response to comments made by Mr Bamber on BESS and the knock-on effects of HGV trip generation, Mr Darrall stated that the BESS and PCS units are in the spreadsheet and it is not the total and the Applicant will add that in.

Post Hearing Note:

Please refer to the Applicant's response to Action 4 in the Actions Response Table below.

The spoil was 5% and is now 25%. 10% is the proposal. In respect to the compounds, reusing the aggregate in the compound is a common thing on a construction site, and the aggregate is sieved. For instance, buckets on diggers which can be reused e.g. access tracks. In terms of concrete footings that came directly from the manufacturer, it requires archaeological protection. Some of that area did not have panels so did not require concrete. In terms of equipment deliveries, the Applicant always had a little allowance in for equipment and machinery and that had increased over time. The Applicant believed that the allowance is suitable. In terms of other equipment and trips the figure was 1227 at D1 and now it is 2802. The Applicant assumes 1702, which includes all the equipment and deliveries, and is not intending to increase that number. The number is reasonable, assuming 2 HGVs each week for each compound. Servicing of compounds will require HGVs moving from one compound to another, which is a lot of HGVs over the 2-year construction period. The Applicant also assumed that the concrete areas for the 132KV substations adopted Mr Bamber's assumption of 50% of the area as concrete. But the plan in the **Environmental Statement Volume 3 Appendix 3-3 Illustrative Drawings [REP5-065]** Appendix 3-3

	section 11, show about 7.2%. Concrete deliveries generate a lot of HGV trips; this is an overestimated. Similarly, with the 400KV substation, the Application overestimated it at 49%, but it is more likely at 5%, see Environmental Statement Volume 2, Figure 3-3 400 kV Substation and BESS Layout [APP-083] figure 33 which shows that. The ExA asked whether the access tracks are needed during construction, to which Mr Darrall confirmed that some are needed earlier than others because of phasing. The Applicant can reuse the aggregate and top up the access tracks within the existing areas. This will be done on Westburn for example.
3. Construction HGV flows on key routes	The ExA, in relation to the Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107] Tables 3-3, 3-4 and 3-5 (peak and average daily HGV Movements for Construction Routes), asked the Applicant to confirm whether there were fewer daily movements in Lime Down D West, past the Bradfield cottages, and whether this is due to a larger construction programme rather than a reduction in HGV numbers. Mr Darrall confirmed that was correct and that the longer programme was for the 400KV substation, which is more spread out. The total number of HGV trips is the same but extended. Overall, the HGV numbers increased from that originally contained within the ES. The ExA asked the Applicant to explain table 3-4 representing annual average daily traffic HGV movements for each of the sites, and whether it was realistic to gaging average daily traffic. Mr Darrall noted that table 3-4 was to illustrate what average trips looks like. The annual average daily traffic for the baseline is every day of the year which has to be included. The ExA noted column 2 of tables 3-4 and 3-5 which stated the annual average daily traffic, but the numbers in the ES Volume 3, Appendix 13-1 Transport Assessment [REP6-015] are different. The annual average daily traffic for A is 8, B is 8, C is 14, D West is 36, D East is 16 and E would be 12. The ExA asked whether the numbers are peak numbers or annual average daily traffic numbers to which Mr Darrall confirmed that that in the ES Volume 3, Appendix 13-1 Transport Assessment [REP6-015], the peak was used for the annual average daily traffic.

The ExA noted Table 13-12 of the **ES Volume 3, Appendix 13-1 Transport Assessment [REP6-015]** and asked why the peak was used as a comparator and not the average. It did not state that the Applicant is using the peak day movements, rather it states average day movements. Table 3-5 of the **Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107]** shows minus numbers, which would have been pluses instead. Mr Darrall confirmed that the ExA was correct and that the first column was peak and is the annual average daily traffic and the second column was average. The ExA asked for clarification as to table 13-12 **ES Volume 3, Appendix 13-1 Transport Assessment [REP6-015]** and whether that is average day movement or peak day movement, as it states average not peak, to which Mr Darrall confirmed that it is average. It is comparing the annual average daily traffic which is the peak against an average number. Tables 3-4 and tables 3-5 of the **Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107]** would need to be rerun with new assumptions made, for Deadline 7.

Post Hearing Note:

Please refer to the Applicant's response to Action 6 in the Actions Response Table below.

The ExA noted the percentage increases between Stop Lime Down numbers and the Applicant's numbers, based on SLD's **Transport Submission – Additional Submissions – Accepted at the discretion of the Examining Authority [AS-028]** and the **Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107]** and whether the flow numbers of HGVs are correct. Mr Darrall confirmed there have been no changes to the numbers and Mr Bamber also confirmed. Stop Lime Down and Wiltshire Council commented first. In respect to the implications of those numbers on the flow routes, Mr Darrall stated that the numbers are different because there are two different sets of trip generation numbers.

Comparing those with the **ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014]** starting with the B4039 there was a 75.8% increase and now it is a 105% increase (route to Lime Down A, B and

C). On the road west of Grittleton, it was 102% and on the diagram, it is 141%. There are large jumps because of the base HGV flow is quite low, any slight change will jump the percentage significantly. On Alderton Road there was a 250% increase in the ES, now it is 265% It is a big percentage increase but not a big increase in HGVs. On Fosse Way, there is a 238% increase from the baseline of 21 and in the Applicant's assessment it shows 265%. Between Fosse Way and Sherston, there is 38.1% and the new figures show 45%, the base traffic is 42 and then the proposals increase it by 19 HGVs. For the route to Lime Down D and E, which is the A429 north of junction 17, there was a 14.4% increase, and that has gone to 17% on the diagram, it has moved up slightly. On the road east of Hullavington, the figures were 41.5% and now it is 40% because the period of time for constructing the substation has been lengthened, which reduces the peak. On Bradfield cottages, the Applicant was showing 117% which is now 113% for the same reason, an increase of 54 HGVs compared to existing 48. The HGVs travel up to Bradfield Cottages where there are concrete deliveries. There is an industrial element, just north of the bridge on the right-hand side of Bradfield cottages. Further north, the number of HGVs starts to decrease significantly. For the peak hours, there are 7 HGVs north and 4 HGVs south.

The ExA asked whether there were any changes to the assumptions made, to which Mr Darrall confirmed that the Applicant is not changing the assumptions given the low existing HGV numbers in some locations, and that a high percentage increase does not mean it is a high number of increases of HGVs. Where there is a percentage change, the Applicant will take it forward for further assessment and look at things such as fear and intimidation, to do with the step change in HGV numbers. The Applicant will update the Environmental Statement with the new numbers, Ms Brodrick confirmed that the original numbers and new numbers will be shown together to assist with review.

Post Hearing Note:

Please refer to the Applicant's response to Action 20 in the Actions Response Table below.

The ExA asked for clarification on the hourly frequency of the HGV links, noting the **Outline Construction Traffic Management Plan [REP6-041]**. There are different figures for Stop Lime Down and the Applicant.

Mr Darrall stated that is correct for a peak day but for an average day Mr Darrall will revert in writing. The Applicant noted that the peak is the worst case.

The ExA asked for Applicant to provide the final HGV numbers at the close of the examination, with percentages for daily flows on key links, and an extra column for the annual average daily flows, and hourly flows. This is to be the averaged and not the annual average daily traffic.

Post Hearing Note:

Please refer to the Applicant's response to Action 7 in the Actions Response Table below.

The ExA also asked the Applicant to revisit tables and for a thorough overhaul of the tables 13-22, 13-23, 13-24, 13-25, 13-26, and 13-46 of the traffic flows in the **Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107]**. Tables 13-16, 13-17, 13-23 and Annex F in the **ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014]** will need revisiting because they also cover peak numbers.

Post Hearing Note:

Please refer to the Applicant's response to Action 20 in the Actions Response Table below.

The ExA asked the parties to explain what would happen if two HGVs met each other on Fosse Way in Bradfield Cottages, noting Appendix C of SLD's **Responses to the ExA's second written questions (ExQ2) [REP5-130]** where Stop Lime Down included information, which was reproduced by the Applicant in the **Environmental Statement Volume 3 Appendix 12-6 Outline Archaeological Mitigation Strategy [REP6-012]**. There would be 2.31 HGV meeting events in one hour on Fosse Way and 1.71 HGV meeting events in an hour. Mr Darrall confirmed that the existing flows are from the surveys. The proposed HGV flows are what was originally in as hourly flows. Now those are being revisited, they may slightly increase and the tables would need to be revisited.

Post Hearing Note:

Please refer to the Applicant's response to Action 20 in the Actions Response Table below.

Mr Darrall stated that the parties agreed the probability calculation in combination. The numbers are for the existing flows, in an hour in the day where there are the most existing HGVs. It is a peak hour in the whole day, and it does not replicate what happens every single hour of the delivery window. 2.31 is the number of counts in an hour along the route, e.g. Fosse Way includes Alberton Road and Fosse Way as well. That does not exclude the areas where HGVs can pass. This lowers the number of accounts to approximately one in five. It does not take into account if one HGV is waiting in a passing point. It assumes that the HGVs are moving along. The Applicant agreed with the calculation and already submitted what happens when vehicles and the convoy are released which is a common occurrence for Construction Traffic Management Plans and construction sites. On Fosse Way, that would lower the encounters to less than one an hour. That would require more management on behalf of the traffic management operator.

The results of the Applicant's revised NMU survey data in the **Highways Technical Note - Non-Motorised User Surveys [REP6-061]** as related to safety issues for those receptors came in at Deadline 6. The ExA asked the Applicant to provide the headline points of the survey results. Mr Darrall responded that the survey was completed at the end of July and beginning of August covering key sections of the construction routes. The locations included Fosse Way (the northern part), site 1 and site 2 which is the middle of Fosse Way, site 3 which is Alderton Road, Site 4 which is Bradfield Cottages by the Flying Monk Café, site 5 which is an unnamed road east of Hullavington, site 6 which is an unnamed track southwest of Rodbourne, site 7 which is an unnamed track south west of Rodbourne near MALWW54, and site 8 which is an unnamed track southwest of Rodbourne at the railway bridge.

Mr Darrall further explained the key sections of the construction site to Fosse Way, as shown in table 3 of the **Highways Technical Note - Non-Motorised User Surveys [REP6-061]**, there were no recorded

	horse riders and a low number of pedestrians. There was a moderate average of 41 cyclists recorded in the proposed weekday delivery hours, and 96 cyclists recorded on the Saturday delivery hours. For site 3 at Alderton Road, it is shown on Table 4 which showed very low numbers of passersby and horses, and a moderate average number of cyclists with 50 cyclists recorded in the weekday and 100 recorded in the Saturday delivery hours. For site 5 at Bradfield cottages, it is shown in table 5, where there were no horse riders recorded, and a low level of pedestrians, there were 30 cyclists recorded in the weekday delivery hours and 66 cyclists recorded on the proposed Saturday delivery hours. The Applicant concluded that the likelihood of construction vehicles interacting with pedestrians or horse riders is low but there are a higher number of cyclists. This would not change any findings of the Environmental Statement. For clarity to Stop Lime Down and Wiltshire Council, Ms Brodrick confirmed that Mr Darrall did not say that there would not be any interactions with cyclists, rather he said it did not change the conclusions.
4. Construction route highway improvement works	The ExA asked questions relating to Annex I of ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014] showing the width of the passing places (PL305B), to which Mr Bamber noted pinch points in the network and no solutions to resolve this without adverse implications. Mr Darrall responded noting the mitigation and approach. He stated that he agreed with Mr Lear's comments to use the area at the side of the road which has gravel on it, which is what is being used at the moment. The Applicant has assumed that it is a usable carriageway, which is currently subject of disagreement. The verge itself does not have curbing on it so when it rains and there is a run-off, it messes up the verge edge and any vehicles driving there. Before the construction starts there will be a preconditions survey to look at these areas. As a result of this survey, the Applicant will make any repairs that evolve because of any damage during construction. When making repairs, the Applicant will return it to carriageway, not gravel. The Applicant is committed to the condition survey. The Applicant is using a swept path analysis in some areas such as the gravelled area next to the verge. The Applicant does not agree with some of the measurements by Mr Bamber on widths, the Applicant believed it is 5.5 metres, with a swept path analysis to show what HGVs can pass there. The bend is tight and it is shown on the plan that there is no intervisibility for about 30 or 40 metres. The Applicant assessed the number of vehicles and number of encounters and noted existing flows of 7 HGV flows Northbound and 4 HGVs Southbound. If it were an issue, it would be noted in the accident

records. For reference 3, it is 3 Northbound and 3 Southbound HGVs for the construction traffic. The Applicant used the probability calculation that is used in the 30 metres and the number of counts during the peak hour in a delivery window is 0.08. It is very low numbers and a very low probability. Drivers will also be driving incredibly slowly around that bend, so overall there is no mitigation needed. There is a lot of public highways there and it could be widened.

The ExA asked whether to include the land in CA knowing it was a difficult bend to deal with, after Mr Lear noted that the road could deteriorate and become unusable and also noted the logistical and safety concerns. Ms Brodrick noted that there is not necessarily a need as there is sufficient space. Whilst Wiltshire Council's preference is to widen the road in this location, and that would seemingly address some concerns, she noted that Wiltshire Council wanted that to be done before construction rather than a remedial action. The Applicant understood that the verge is part of the public highway.

The Applicant confirmed it would take this away and double check that there would not be any impediment to the delivery of those road widening works, and that it could be in the protective provisions to do the work subject to approval from Wiltshire Council.

Mr Lear noted visibility issues on the verge and potential vehicle conflicts and pedestrian safety issues, to which the ExA asked whether diversions of public rights of way were considered. Mr Darrall confirmed that they will provide an indicative plan showing the widening of the bend and any potential interaction with public rights of way.

Post Hearing Note:

Please refer to the Applicant's response to Action 8 in the Actions Response Table below. The Applicant has reviewed the proposed extent of the road widening of the section containing the bend to the north of The Street shown on Insert 02 of Plan No. PL305B in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014], against the alignment of Public Right of Way (PRoW) HULL29. This review confirms that the land required to accommodate the proposed road widening does not overlap with, or

	<i>otherwise conflict with, the definitive alignment of PRow HULL29. The proposed widening can therefore be undertaken without requiring the diversion or alteration of PRow HULL29.</i> Mr Lear noted another section with a road curving where there is a 160-metre-long section with no intervisibility and is quite a length. There is opportunity to bite into the carriageway. Mr Darrall noted that the existing number of HGVs reduce at the point that was referenced in the plan. He noted SP51A in Annex K, which showed a swept path analysis of HGVs and a shorter intervisibility. The intervisibility line goes close to the tree, and the hedge would need to be trimmed back. This has not been put forward as mitigation yet, Mr Lear wanted widening there rather than mitigation. The ExA noted that there was a high number of HGV movement already with accident records not showing anything significant. The ExA asked the Applicant to confirm whether that position is correct, to which Mr Darrall stated that it was correct, with 7 HGVs North, and 4 HGVs South. There were no accidents reported at the bend, and it may be because it is tight and people drive more carefully around there when in an HGV. Mr Darrall further noted that for 80% of the trips, the HGVs will be 9.8 metre long tippers, and then for the PCS units and BESS units, they will be LIL vehicles because of the weight and will be escorted down that road. The ExA asked Wiltshire Council for any other areas to focus on, to which Mr Lear noted Fosse Way between a junction, 300 metres north of the Stoke Lodge Junction and that mitigation is concentrated together rather than with sensible spacing, with areas of edge damage. The Plan referenced is Annex I, PL306 Fosse Way South. Mr Darrall responded that on Sherston Road from Fosse Way, the swept path analysis showed vehicles passing at that point. The Applicant also explained that they did not have the ability to improve that corner as to widen it at Olson Road. SP43B is Fosse Way North Bound, SP44B is Fosse Way North Bound which is the top end and SP45B which is South Bound. This is also Annex J (Car passing an HGV) and Annex K (Two HGVs passing) SP52B. He referred to the northern end of the plan which showed an intervisibility of 57.3 metres.
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In response to points made by Mr Bamber on the when a driver would see another in the other direction around the bend and the restricted forward visibility, Mr Darrall noted that the swept path showed two HGVs side by side on that bend where there is an intervisibility line, which is around the bend and one could see the next passing point. On the left it crosses the give way markings, and that road is a dead end. He referenced Network Rail works occurring. Mr Bamber noted that there would need to be an evasive manoeuvre as the driver would not know to get into that position to pass. Mr Darrall noted that the Northbound would see the South Bound before the position showed on the plan, approximately two green arrows back from the track on the left.

The ExA noted a road south of the land previously mentioned on a relatively straight road and asked the Applicant to explain why there were so many sections to pass. Mr Darrall noted that it is good for visibility as it is a long straight road. Mr Lear noted that the Applicant is relying on what is there, and that the Applicant is only improving land within the redline boundary. Mr Darrall stated that 80% of the vehicles are 9.8 metres long and that the passing bays are long enough for that, and 20% are not, but those encounters are less. The ExA further pressed the Applicant on what would happen in the situation where the occurrence does happen, to which Mr Darrall noted that with the Network Rail works, there is no widening for that in place which is above what is predicted for the Lime Down project, so the Applicant believes what is provided is adequate.

Mr Lear noted that the Applicant made changes to Alderton Road in accordance with the maximum requirement but did not make changes for the section from Alderton Road to Fosse Way, to which Mr Darrall noted that Fosse Way is a long straight road with good visibility, different from Alderton Road. He noted existing passing places that are being used and are adequate for the HGV trip generation. Regarding the lengths, at the bottom of Fosse Way there is 15 metres which is less than a 16.5 metre vehicle, but the next one is 19 metres, 23 metres and 20 metres so there are adequate passing positions for the larger vehicles.

Ms Brodrick clarified that Mr Darrall did not consider additional works to be required when the actual order limits were being put together and that an exercise was done at the time to note known highway

	improvement works that were necessary which was included in the order limits from the outset. This is now about further works that Wiltshire Council would like to see which are areas Mr Darrall did not consider there a need for further works so they were not included in the order limits. Mr Darrall believed there was sufficient width and set out his views. If it is a case where Wiltshire Council want to see specific works in advance of construction rather than repairing after the deterioration, then they can provide that to the Applicant. There are also a range of measures as part of the mitigation, there can be signage up for other road users and HGV drivers will be given a full briefing on the routes and pinch points. There is a suite of measures to minimise issues, but the conversation is being had in the absence of the mitigation works. Wiltshire Council is to provide a list. The ExA asked the Applicant not to assume that list by Wiltshire Council on the passing bays is the entire list and nothing else. Ms Brodrick noted this and stated the Outline Management Plans are intended to reflect the situation as at a point that the Applicant seeks to discharge that requirement and the detailed design. It would not place a limitation if the base line changes, but rather to give comfort if there are specific works that Wiltshire Council want the Applicant to deliver before construction. The Applicant is happy to add in some commitments if needed at the detailed design stage. Ms Brodrick further noted, following concerns by Stop Lime Down and Wiltshire Council, that the Applicant will do further works and the Applicant where they commit to doing any particular works, will not be looking at those in isolation. The Applicant would see the consequential impacts. The majority of things looked at, would be where the road is currently already damaged or vehicles are already using it and making that more formal and repairing it. The impacts would be minimal, and it is something that the Applicant would consider putting forward as a mitigation measure. The ExA asked about adaptive management and what would happen if any part of the route becomes inadequate or unusable, to which Mr Darrall noted that the Outline Construction Traffic Management Plan [REP6-041] is a live document throughout the whole construction period and things can be added to it itself. The ExA asked what powers Wiltshire Council could do after they approved the document, to which Ms Brodrick responded that currently, the adaptive management provisions state effectively that
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	should it become apparent that some of the construction routes become problematic or not suitable, then the Applicant has an obligation to consider those and agree them with the local highway authority. This problem exists with all construction projects, and the Applicant can take this away and consider the wording to ensure an explicit provision for the Applicant to be proactively forced to do something. Ms Brodrick further noted that the DCO gives the Applicant powers, but if there was an issue where the road had to be closed, the DCO does not override existing laws. The Applicant would need to discuss alternative routes and diversions, and whether they would be suitable for a limited time. In response to Wiltshire Council's comments on highway safety and legislation, Ms Brodrick noted the DCO only specifically changes or disapplies legislation that is specifically referred to in Article 6. Otherwise, it is subject to any other piece of legislation that applies at that point in time. The Applicant must comply with all other laws. Wiltshire Council have powers to deem the road unsafe for all HGVs. The Applicant has a complaints procedure in the Outline Construction Traffic Management Plan [REP6-041] and the Applicant will make it explicit to have ongoing dialogue with the Highway Authority, which will be able to raise concerns. The ExA noted that the additional wording in the Outline Construction Traffic Management Plan [REP6-041] can allow the Council to facilitate dialogue and the onus to not only be on the Applicant, to which Ms Brodrick noted the point and stated that the Applicant would consider the wording and the different circumstances where it could apply that could necessitate additional works or additional mitigation measures that have not found their way into the final Construction Traffic Management Plan. The Applicant noted it would consider adding to section 6.18 and will look to other DCOs that are out there that have considerably more traffic movements. <i>Post hearing Note:</i> <i>Please refer to the Applicant's response to Action 10 in the Actions Response Table below.</i>
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5. Construction worker traffic	The ExA asked the Applicant to explain its reliance on proportioning of light vehicle movements across the site and the justification for reliance on 50% shuttle bus usage. The ExA also asked the Applicant to explain the methodology and enforceability aspects of this, and whether the constriction work will need to be increased given the planting of nearly 250,000 more panels than originally assumed. Mr Darrall stated that the work trips were derived from a breakdown of all the activities that would be undertaken in each site over the 12-month period and came from a contractor. The Applicant was given monthly maximums. The maximum number of worker trips over the whole period was 622 which was distributed those proportionately based on the size of each area. The Applicant appreciated that it did not focus on the routes, but on a route-by-route basis, it resulted in 295 workers in A, B and C, and 327 workers in D and E. The peak work trip month was 622. The Applicant wanted to check whether that was divided on the two sites or focussed on a single route. It was found that the peak daily trips were lower with 289 workers in A, B and C, and 313 workers in D and E. The Applicant applied this maximum worker number to every day of the construction period, so every single day of the construction period had the maximum peak flows. Since then, the 400kV construction period was adjusted, but it was not submitted at the last deadline. The 400KV substation was spread out over a longer time period, so it does not change. That overestimation did not increase the actual peak day but increased the number of workers overall. The Applicant confirmed it would submit this at Deadline 7. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 20 in the Actions Response Table below. Further detail on the numbers of construction worker trips has been included in Section 1.5 of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7). This takes account of the increase in panel numbers and is based on the proposed construction programme. The numbers presented show the</i>
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	<i>peak number of construction workers on each of the respective construction routes in accordance with the construction programme.</i> The Applicant conducted a further test assessing the busiest 12-month construction period for the workers to see the realistic peak period, taking into account the days where there are less worker trips. The trips were lower at the AOTs at the Fosse Way and Bradfield cottages would be 66 and 96. In respect of the shuttle bus, the Applicant believed that they are required as some workers may not have a vehicle or hold a licence, and the rural location of the Scheme means that direct access by public transport is limited. The shuttle bus would help address that. It is important to minimise effects on the highway network, transporting multiple workers and reducing car van trips. Overall, the Applicant believed 50% will use shuttle bus. The Applicant compared this to the other DCO schemes, but there is no existing survey information to demonstrate the update of the shuttle bus that is publicly available. There is a need for it which means it will be provided. From the socioeconomic chapter, 59% of the strips are estimated to relocate to the study area and 40% of the workers are already within the study area. There is a large pool of workers outside of the area who would be expected to be able to travel by other means or use a shuttle bus. Some of those that are relocated into the area, and they are the target workers for the shuttle bus. On the other DCO solar farms, there are 55% use estimates. The 50% lands below the other DCO assumptions and applications. The reason why 50% is robust is because the proportion of work likely to be shuttlebus accessible is 59%. It does not include any workers closer than 20km, even through those workers may not have a car, and it sits at the lower end of the comparable site. This gives the Applicant control over uptake by targeting accommodation locations with the greatest worker concentrations, providing pick up and drop off points at temporary accommodation, train stations, residential centres etc. This will be managed and promoted throughout the course or lifetime of the Construction Traffic Management Plan (see Outline Construction Traffic Management Plan [REP6-041]). Monitoring and compliance will be through the traffic safety control officer in the Construction Traffic Management Plan (see Outline Construction Traffic Management Plan [REP6-041]). The increase in panels will increase the number of workers which will be submitted at Deadline 7.
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	The ExA noted that the Council thought the worst case would be 20% and questioned the Applicant's 50% worst case assessment. Mr Darrall noted that they based the percentages off the other schemes that have not been constructed. The ExA noted that it was not evidence, to which Mr Darrall responded that the Applicant cannot provide evidence where there is no evidence, and the information received is what was applied on the other schemes. There is no information on the update. The ExA asked if the uptake was 20%, would more compounds be needed or more parking needed, to which Mr Darrall responded that it is controlled by having parking available at the compound and at the access roads. Workers will not be able to park on the public highway. In terms of the actual capacities and impact on the road network it is marginal because they are not travelling in the peak times. Mr Bamber commented on the numbers of workers on site each day to which Mr Darrall stated that the number of workers will increase but the peak will not go up. The ExA asked the Applicant to confirm why the number of workers for the substation would increase, to which Mr Darrall confirmed that the Applicant had proportionately increased for the substation. The only reason the numbers of construction workers overall goes up is because of the increased number of panels planting. Mr Threlfall stated that this is a worst case. The Applicant is assuming that they would go up because there is a lot of flexibility and a lot of factors that could affect how quickly the panels could be installed. A contractor would want to extend the period using the same number of teams, as certain people do certain jobs. If it was built out at speed, then more teams would be needed. 150 workers at once is not how it would be in practice. Although there would be excavation works and groundworks which would require more workers once electrical works are going on, there would be less workers and more specialists working for the period. This is the worst-case scenario for the full amount of people that will be on site for that period. Ms Brodrick noted that there are measures in the Outline Construction Traffic Management Plan [REP6-041] about workers parking on surrounding streets. Section 6.8 states that contractors will be advised that parking and permit parking is not permitted on the street in the vicinity of the site. Workers will either therefore have to effectively make sure that they have a parking space available for them in the compound or make use of the shuttle bus service and section 6.14 includes the control measures in terms of if contractors are found to not be complying with the terms of that. There is a disciplinary measure should the workers be found not to be complying with those rules.
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The ExA asked whether wording could go in there to help the Council, to which Ms Brodrick stated that paragraph 6.14.9 has a general compliance monitoring report to be made available to the relevant local planning authority and the relevant highway authority to ensure both compliance with the **Outline Construction Traffic Management Plan [REP6-041]** and where action has had to be taken. This is a general provision on monitoring not specific to the shuttle bus, but the Applicant will add something in about shuttle bus patronage after the ExA concerns. Mr Darrall noted that the Travel Plan Coordinator will monitor the use as well, the text can be added. Ms Brodrick confirmed that a specific reference can be added in the relevant appendix.

Post Hearing Note:

Please refer to the Applicant's response to Action 11 in the Actions Response Table below.

The ExA asked about the traffic dispersal and whether the Applicant gave any consideration to the likelihood for local traffic dispersal onto other roads creating rat runs from local people seeking to avoid construction vehicle routes. Mr Darrall stated that the reason for avoiding a route is normally through congestion. The Applicant had completed intimidation calculations for the routes, and it did not show any step change. The ExA asked for a human common-sense approach as well as the step approach, to which Mr Darrall stated that they look at it from a technical perspective and try and mitigate and reduce any delays or issues that could affect the existing users of the network.

The ExA noted that the response was too technical and missed the human judgment even if the ICEP guidance was followed, to which Mr Darrall stated that the Applicant had to assess this on a technical basis which they have done. The main reasons why people technically avoid a route is they cannot physically pass through a route or traffic. He agreed that some professional judgement was needed to be applied to the methodology. Ms Brodrick noted that there is a difference in professional judgment, and Mr Darrall's professional judgment is different from Mr Bamber's professional judgment.

6. Construction traffic management plan	The ExA asked the Applicant to explain how it can be guaranteed that the chosen delivery contractors will be prepared to adopt appropriate technology to allow real time tracking and booking, to which Mr Darrall explained that there will be an onboarding process which is something that IGP will undertake when the contractors are on board. It is not unusual to have tracking or a GPS system for deliveries to construction sites. Ms Brodrick explained that in the outline plan, a booking system will be set up and the final plan will need to be substantially in accordance with that, and the contractor that is appointed will be contractually compelled to comply with the DCO and its subsequent management plans because it is an offence not to comply with them. Mr Darrall mentioned that it is not an unusual commitment to make. It is a standard system that is put in place with larger infrastructure schemes, and it is perfectly feasible to get the contractors to comply both contractually and commit to complying with it in practice too. The ExA noted that in the Outline Construction Traffic Management Plan [REP6-041] paragraph 4.7.2, the HGVs may need to be held back by the site managers when departing if HGVs are arriving at the site. The ExA asked if this significantly increases the logistical difficulties in implementing an effective HGV management system. Mr Darrall noted that there is real time tracking and delivery information to report vehicles coming onto the site and holding back vehicles if required. It is a management process and will not happen for every single delivery. The numbers spoken about were for peak days. The ExA asked how many banksmen are needed for the whole construction period, to which Mr Darrall stated that there is a health and safety requirement to have a Banksman for the construction site. He could not provide an exact number, but there will be on available at each access. This will not be all the time, but they will be there for any manoeuvres where there are cable route access junctions with limited visibility, which is preferable to chopping down the hedge. The ExA asked how they will communicate with the operator of the booking system, to which Mr Darrall responded that it is coordinated by the principal contractor who oversees the booking system. There will be people at the access all the time who will not necessarily be banksman. The ExA noted the tracking system and noted the Applicant's Response to Submissions Received at Deadline 5 [REP6-060] (TT2.3B) on Wiltshire Council's route monitoring. The ExA asked about the monitoring of the routes and the difference between logistics routing or a tracking system. Mr Threlfall
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explained that they had conversations with contractors about transport and use of the system. Vehicles are fitted with a tracking system and operate as a real time 'uber' system so the Applicant can see exactly where the lorries are. There are techniques used to place a tracker on a convoy, and it will depend on the contractor, but they will be compelled to use a booking system with real time monitoring. There are a few different options available. The management can be done in real time by the manager of the principal contractor, supported by a team. The ExA understands the booking part but queries the tracking and routing aspect for the Council to see that the routes followed are the ones designated. Mr Threlfall stated that the system sets the route which is predetermined. Any decision to go off that route is for the driver and that there are penalties if the driver deviates from the route. The ExA asked whether the commitment in paragraph 6.14 of the **Outline Construction Traffic Management Plan [REP6-041]** was sound enough. Ms Brodrick noted that the Applicant can clarify the wording, and that is the intention. There are a lot of bespoke systems, some used more widely than others so the Applicant cannot commit to specify a product, but the Applicant can add more detail regarding the functionality aspect. The data outputs can be provided to the Council, but not the live tracking.

Post Hearing Note:

Please refer to the Applicant's response to Action 12 in the Actions Response Table below.

The ExA noted paragraph 6.14.7 of the **Outline Construction Traffic Management Plan [REP6-041]** and asked the Applicant what parameters the Applicant will use to determine compliance. Mr Darrall stated that there are booking times and arrivals so they cannot turn up too early or too late, this is easy to manage. It is difficult on an individual HGV basis, but the route app will state the data and record the routing, where further action can then be taken.

Post Hearing Note:

Additional wording to Section 6.14.9 has been provided as requested in the **Outline Construction Traffic Management Plan [EN010168/APP/7.22]** (Revision 7), submitted at Deadline 7.

	The ExA noted paragraph 3.2.1 of the Outline Construction Traffic Management Plan [REP6-041] on the abnormal load movements and that there was no information on abnormal BESS load deliveries. The ExA asked whether the Applicant would need to agree the BESS abnormal loads with the Council and police. Mr Darrall explained that the BESS movements need to be added in and would go through the abnormal load process, which is a special-order license and agreement with the Council and Police. This also requires traffic management measures. The haulage company has the swept path analysis, and they determine, looking at the constraints, what vehicle they want to use for that route. The Applicant had assessed the absolute worst-case vehicles through the routes which are, for example, the massive girder vehicles for the substations. When it comes to the actual license, it will most likely be a smaller vehicle. The ExA asked if there were any weight restrictions on the Lime Down D route. Mr Darrall stated that there were not. The ExA noted Table 4 paragraphs 3.2.5 and 3.2.6 Outline Construction Traffic Management Plan [REP6-041] needed revising. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 13 in the Actions Response Table below.</i> The ExA noted paragraph 3.2.7 of the Outline Construction Traffic Management Plan [REP6-041] which stated the deliveries to and from access points 123 to 127 on the Cable Route Corridor would avoid the school start and finish times for the relevant schools, and asked whether the route would pass by schools during finishing times. Mr Darrall stated that the route did not pass in front of the school. The ExA asked whether there were any crossing points at Taunton Road, to which Mr Darrall noted that the school there is further away from the route and the B4039 carries more HGVs and is more suitable, and it is wider. The Applicant confirmed it would review this. <i>Post Hearing Note:</i>
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*The primary school at Acton Turville is located on a minor road approximately 350 metres to the east of the proposed construction route. Time restrictions on HGV deliveries at this point are therefore not required. In respect of Shaw Primary School, there is already a HGV delivery time restriction under the **Outline Construction Traffic Management Plan [REP6-041]** as it is located directly adjacent to the construction route and also takes access from it.*

The ExA noted paragraph 6.6 of the **Outline Construction Traffic Management Plan [REP6-041]** and noted concern that the diversion routes could be unsuitable for the vehicles and whether there needs to be wording included that Council consent is needed to confirm that diversion routes are appropriate. Ms Brodrick explained that there is a difference between using them on an ongoing basis and HGVs being on the road, and it being closed because there is an emergency and the vehicles need to utilise another route at that point in time. The Applicant can look at the wording. The Applicant considered 'where suitable' was appropriate but will look to clarify this further.

Post Hearing Note:

Please refer to the Applicant's response to Action 14 in the Actions Response Table below.

The ExA queried why the road condition surveys would be covered by the **Outline Construction Traffic Management Plan [REP6-041]** rather than a separate section 59 agreement. Mr Lear made comments on what is reasonable in respect to damage caused and what the Applicant will repair, to which Ms Brodrick stated that the **Outline Construction Traffic Management Plan [REP6-041]** goes further in a DCO and that is why it is used. In respect of the wording, it needs to be damage that the Applicant is responsible for, which is why it needs to be 'reasonably attributable' to the Applicant. The initial condition survey and requirements in the interim will establish that evidence pattern to help make that decision. It is for the Applicant to then state why it does not consider any damage to be attributable to the Scheme and provide evidence for that. The Applicant added the last sentence to try and be helpful, if general maintenance is carried out by the Highway Authority because of the Scheme, then those costs can be payable by the Applicant in that scenario. Works the Applicant is doing will be done by the Applicant. The protective provisions between the Applicant and the Highway Authority will be in the DCO in the next

deadline and are agreed. They will provide commuted sums or a bond to ensure the works are done to a standard, and money is there to ensure works happen going forward. If the Council want to see specific changes, then the Applicant can take it into account, particularly the last sentence. The Applicant should not repair on a blanket obligation for other repairs not caused by the Applicant's Scheme.

Ms Brodrick explained that the Applicant's view is that the wording can reasonably be attributable to be sufficient to cover a scenario where, even on the specific roads, if it is clearly caused by another party, the Applicant could confirm that it did not cause it and provide evidence. The existing wording provided that opportunity. If it is the Applicant's damage, then the Applicant would be compelled to repair it. To clarify, it is not repairing it to the preconditioned survey.

Following a question by Ms Chalaby on the powers provided to Wiltshire Council on road suitability and the numbers of HGVs, Ms Brodrick will look at some wording, but the **Outline Construction Traffic Management Plan [REP6-041]** had been based on estimated numbers and it is the final construction traffic management plan that will contain the actual numbers required. The suitability of the road network will be determined by the precondition surveys and the final numbers. The Applicant was trying to cover if something unexpected that does not accord with the more detailed information that will be available. The final plan will have considerably more information in it that would allow the Council to have comfort that the measures are suitable.

The ExA noted the 2 network rail assets SWB/B/96/47 which is a bridge on Fosse Way and SWM/B/90/40 which is a bridge near Kemble. The Applicant wrote to Network Rail on the suitability on the original **Outline Construction Traffic Management Plan [APP-027]**, but that has been wiped. Mr Darrall noted that there is further correspondence with Network Rail which can be added in. The final load and vehicle type is a matter for the special-order licence. The Applicant did not know the actual loads, but the Girder vehicle spreads the load. The haulage company will know the constraints on the two areas and that will determine the vehicle type. The Applicant will be clear on this in the outline construction traffic management plan. Ms Brodrick confirmed that they will look at that and add it in.

Post Hearing Note:

	<i>Please refer to the Applicant's response to Action 15 in the Actions Response Table below.</i> The ExA noted an Interested Party's query on the weight limit on the Forlorn Bridge, to which Mr Darrall confirmed the bridge is not on the route. Mr Bamber noted concern with the HGV management system and the banksman, with safety risks. Ms Brodrick explained that the NSIP projects are logistically complex and the people undertaking them have suitable systems in place. This project is not particularly unique compared to the other NSIPs.
7. Any other traffic and transport matters	Mr Bamber noted concern on abnormal indivisible loads on the B4039, to which Mr Darrall responded that in the Responses to the ExA's second written questions (ExQ2) [REP5-114], Sheet 11 there is a red box on the bottom right corner showing a junction with Fowlswick Lane and the B4039. The HGVs and AIL will travel North up the B4039 to reach the junction and then they will travel along Fowlswick Lane and turn left into the site and they will do the opposite on exit. The Applicant has tracked that access with the AIL being used and it works fine. It is not in the submission, but the Applicant noted that it could provide it. <i>Post Hearing Note:</i> <i>Drawing SP58 is now included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) submitted at Deadline 7, confirming that site access for vehicles travelling north on the B4039 and then right on to Fowlswick Lane is suitable for the intended size of AIL.</i> Mr Darrall clarified to the ExA that the AIL would turn left into the site, and the vehicle track and access in shown in PL 109B, which is the works required to get the vehicle into the site. The Applicant is not proposing to remove hedgerow and is instead proposing a Banksman to manage the HGV leaving the site. The AIL is different. There are 4 HGVs in operation for 90 days and that is over the course of the day, with 8 movements per day. It is a low number of movements with a Banksman used for those. The swept path analysis is to be provided by the Applicant. The Applicant confirmed it would provide documents and the same information <i>before</i> Deadline 7 to the Chippenham Without Parish Council and Stop Lime Down.

Post Hearing Note:

Please refer to the Applicant's response to Action 16 in the Actions Response Table below.

On Grittleton Crossroads, the ExA noted concern for AILs with the cab on both ends turning left into Alderton Road, to which Mr Darrall noted that the tractor on the rear of the vehicle sits within the red and green lines of the swept path analysis, but that is not shown on there. It does not make the turning any wider and does not run over any additional land. The ExA asked for an updated swept path analysis to SP21. Ms Brodrick noted that in the diagram on the top right hand corner showed the indicative drawing, they will show the cab at either end of the drawing. Mr Darrall stated he will make it clearer in Annex H.

Post Hearing Note:

Please refer to the Applicant's response to Action 17 in the Actions Response Table below.

The ExA asked what is happening at Rodbourne and Lime Down E and explained her current understanding, to which she asked for an explanation. Mr Jackson explained that the **Environmental Statement Volume 2 Figure 3-4-5.1 and 3-4-5.2 Landscape and Ecology Mitigation Plan [REP5-042]** is the clearest drawing to explain the scenario at Bincombe Wood which is the updated land plans that were submitted. It was separate from the work plans. Mr Threlfall explained the high-level changes and explained that originally the access was from the A429 and coming towards field E1 which is just North. It circumnavigates a pond hence the curve. There was a track running up using the existing access against North Bincombe, where there are concerns raised by Wiltshire Council on the certain grounds. With the main access it had been taken into field E2 in terms of construction access. To reach field E6 where the transformer is located, it is the AIL route that passes through fields E2 and E3, goes around the northeastern boundary D3 then into the transformer. That is the main route for the construction access.

The route that remains around the pond and around the outside is where the Applicant had tried to limit the uses as much as possible between where field E6 up the access track between fields E4 and E7. That area would be used for operational purposes to get to the substation from the Highway onto Rodbourne

	Road. The actual specifics of why the Applicant retained work number 8A on the North Bincombe Road is for the limited uses that the Applicant has tried to define. It would still be using by existing agricultural machinery. Mr Jackson further explained that with the track route between Bincombe Wood and E2 and E3, the intention was for the Applicant to use that to maintain and trim the external hedgerow that faced that track for the ongoing operational period of the requirement. There is an existing agricultural use farm access, located within 15 metre offset from the ancient woodland. Mr Jackson further explained that the changes are around the arrangement of the construction and operation and what tracks are being used for what purposes. The Applicant has the existing farm access track and did not want to do any reinforcements, repairs or enhancements to allow greater machinery or greater movement along it. It is just to provide access to maintain the internal edge of that. The construction access is through E2 and E3 through to E6. The ExA asked whether the Applicant is maintaining a route through Mr Eavis' land through the operational period, to which Mr Darrall stated that access 18 is construction only access, and for operational routes it is through Rodbourne. Ms Tate noted concerns about the exit at field E6 and the visibility display to the left (90 metres by 2.4 metres) which is to be reduced to 600 mm. Ms Brodrick responded that the Applicant needs to access the road for hedgerow maintenance. The Applicant needs to ensure that they can access it. If the access track became impassable when the Applicant would be required to do the no-dig methods to repair that and go up and down for the maintenance, that is why the wording is there for the works. Mr Threlfall noted that Ms Tate sent revised wording, but it is not formally agreed yet, but the Applicant will review that and it can go in the Outline Construction Traffic Management Plan and the Outline Environmental Management Plan and the revised plans within those. Mr Darrall said PL 12D includes the junctions 12 and 13 includes the visibility displays and does not interact with the hedgerow so those drawings would not need to be updated. This is Annex C of the ES Volume 3, Appendix 13-1 Transport Assessment [REP6-014].
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	The ExA noted that for field E3, the drivers would not need to look left towards the top of Bincombe Wood access track, as it is only the odd farm vehicle, so they would not need to reduce any hedgerow to 600mm, and instead place a Banksman there, to which Mr Darrall confirmed that they will make the changes for Deadline 7 and provide to Ms Tate. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 19 in the Actions Response Table below.</i> The ExA asked how the Applicant will access the site to wash panels and for small scale maintenance, to which Mr Darrall stated that operational access into the other parcels would be turning right into E4 to get to access 12 and 13. This is from Rodbourne. In response to a question from the ExA, Mr Jackson stated that the Council can see the detailed AMS within the Construction Management Plan. The ExA asked whether there is an impact on footpaths or is it already considered through current documentation (access 18). Mr Darrall noted that it is included in the PRoW management plan. Ms Brodrick stated that the impact would be less as a result of the changes. Instead of the construction going past E1, there is no interaction with construction traffic as it going along the north of E2 and E3 instead. The Applicant can provide commentary on that for Deadline 7. <i>Post Hearing Note:</i> <i>The Applicant has also confirmed that Access Points 14 and 15 will be used for operational access only. This has been reflected in the updated ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) submitted at Deadline 7.</i> <i>The Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 5) has been updated and resubmitted at Deadline 7 to record the agreed position.</i> Mr Bamber asked whether there is greater length of access track within the site, or rather the construction access from the A429 is to be left unused, to which Ms Brodrick responded that the intention is to remove
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	it as a result of the conversations with the landowner. Mr Darrall noted that there were reconfiguration of the access and a slight extension to the access track which will be defined for Deadline 7. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 18 in the Actions Response Table below.</i>
8. Review of the issues and actions arising	The ExA stated that given the time that they will publish this information at a later date.
9.	The ExA closed Issue Specific Hearing 6.

2 List of Actions for the Applicant and Other Parties following Issue Specific Hearing 6

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
1.	Applicant	Include the maximum area (385.3 ha) within Works No. 1 that can be developed with solar modules across all five solar sites in the final Design Principles and Parameters Plan and the outline Construction Environmental Management Plan.	D7	Table 2-1 of the Design Principles and Parameters [EN010168/APP/7.4] (Revision 5) and Paragraph 1.3.2 of the Outline CEMP [EN010168/APP/7.12] (Revision 8) has been updated to state that the maximum area of land to be occupied by Solar PV panels within Work No 1(a), (b) and (c) is 385.3 ha.
2.	Applicant	Recalculate and resubmit the numbers in Table 2-1 in [REP5-107] (ratio of HGV's to solar array areas – applicant's calculations) with the Lime Down waste HGV numbers removed from the calculations. In addition, revisit the Work No. 1 panel planting areas cited for Green Hill, Cottam and West Burton (and re-run the calculations as necessary) so that only the panel planting hectare area is used and not a larger works area for those schemes	D7	The Applicant has recalculated and resubmitted the numbers originally contained within [REP5-107] and has presented these within Table 2-1 of the Applicant's Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [EN01068/EXAM.9.64] submitted at Deadline 7.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		(and explain in detail how the planting area figures for those schemes have been derived).		
3.	Applicant	Explore mechanisms of providing supplier details of panel design and mounting structures (e.g. data sheets on dimensions and weights, delivery loads) to Stop Lime Down (SLD) and Wiltshire Council to enable verification of the applicant's assumptions on HGV deliveries and HGV sizes.	D7	Supplier information has been provided to Stop Lime Down's transport consultant, following a Non-Disclosure Agreement being signed between the parties.
4.	Applicant	Revise paragraph 6.17 of the oCTMP to replace the words 'should be' and 'where required' with a more explicit requirement to use high cube containers if the number of modules in the final scheme layout is calculated to exceed 600,000, to categorically avoid exceeding 1200 HGV deliveries.	D7	The wording in Section 6.17 of the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7) has been updated.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
5.	Applicant	Add the BESS Units and BESS PCU units HGV numbers, to the total HGV numbers in REP5-107.	D7	Trips generated by the BESS units and BESS PCS units have been added to the latest trip generation numbers and presented in Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7), submitted at Deadline 7. The Applicant has also updated the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [EN01068/EXAM.9.64] . This includes an update to Table 3-2 and Appendix A.
6.	Applicant	Revisit and revise column 2 numbers in Tables 3-4 and 3-5 of [REP5-107] to include the originally assessed 'average day movement' numbers rather than the 'peak day HGV movements' (50% uplift) (in line with Table 13-12 of [REP6-014], which identifies the average day movement numbers as 10 for Lime Down A, 8 for Lime Down B, 14 for Lime Down C, 36 for Lime Down D (West), 16 for Lime Down D (East) and 12 for Lime Down E). Recalculate column 4 in both	D7	The Applicant revisited and revised the numbers originally contained within the tables of [REP5-107] and has presented these within the Applicant's updated Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [EN01068/EXAM.9.64] submitted at Deadline 7. As a result, the Applicant has revisited the assumptions made in Section 3.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		those tables as a result and revisit the assumptions made in section 3 of REP5-107.		
7.	Applicant/ Stop Lime Down	Produce an updated (and slightly revised) version of Table 5 included in SLD's [REP1-172] using the parties' final HGV numbers and percentages for daily flows on the key links at peak, adding extra columns for the average daily flows and peak and average hourly flows.	D7	The Applicant has provided the requested table in Table 13-30 ES ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] submitted at Deadline 7.
8.	Applicant	Explore with Wiltshire Council the possibility of widening the road heading towards Lime Down D (specifically but not necessarily limited to the section containing the bend located north of The Street shown on insert 02 of Plan No. PL305B in Annex I of ES Appendix 13-1 [REP6-014]), including any potential landowner issues, to ease possible HGV conflict.	D7	Further to discussions with WC, indicative additional areas of widening suggested by WC have been included in Annex O of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) and Appendix G of the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7). The principal powers for undertaking such works would be through Article 10 of the Draft DCO,

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				with the associated approvals required from Wiltshire Council as the Local Highway Authority.
9.	Wiltshire Council	Provide a plan to the Applicant (and submit into the examination) highlighting areas on Fosse Way where the council's highways department considers that improvements to facilitate two HGV's passing should be considered by the applicant, including details of the type of improvements sought from the applicant. (N.B. The provision of such information by the Council's highways department is in no way to be perceived as preventing the Council from seeking further mitigation elsewhere at detailed design stage, or that the suggested locations put forward from a highway safety perspective are acceptable in landscape,	D7	N/A

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		heritage, arboricultural or ecological terms)		
10.	Applicant	Provide additional wording to Section 6.18 of the oCTMP that could be included to enable the Council to be able to request adaptive management measures if, due to unforeseen circumstances, certain sections of the construction route network become inadequate or unsuitable (e.g. due an increase in the number of accidents or increased verge damage).	D7	Additional wording has been provided in Section 6.18 of the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7), regarding adaptive management measures.
11.	Applicant	Include additional wording in the travel plan, requiring the Applicant at the end of the construction period to provide data to the local highway authority on the actual shuttle bus take-up during the construction period.	D7	Additional wording to the Construction Worker Travel Plan has been provided as requested in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7), submitted at Deadline 7.
12.	Applicant	Amend the oCTMP to clarify a firm requirement for HGV drivers	D7	Additional wording to Section 6.14 has been provided as requested in the Outline

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		to use GPS monitored routing Apps, and for route logs to be available on request to the Council if it seeks to verify that construction vehicles are using the specified construction routes (for example following complaints).		Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7), submitted at Deadline 7.
13.	Applicant	Update section 5 and Appendix D of the oCTMP to ensure that the abnormal load delivery numbers and routes for the BESS units are captured. Also include any additional swept paths that may be required for the BESS abnormal load routes in Annex A and also provide these directly to the Council and SLD.	D7	Section 5 and Appendix D of the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7) have been updated as requested, and submitted at Deadline 7. Additional swept-paths are not required for the BESS abnormal load routes as these have already been tracked for a much larger 16-axle girder frame vehicle.
14.	Applicant	Review the penultimate bullet point in section 6.6 of the oCTMP to ensure commitment is in place requiring dialogue with the council's highways department for confirmation that construction	D7	The penultimate bullet point in Section 6.6 of the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7) has been updated and submitted at Deadline 7.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		HGVs can or cannot use diversion routes if designated HGV construction route(s) are closed (except in emergencies) and formal diversions are in place.		
15.	Applicant	Amend Annex F of the oCTMP to reinstate complete correspondence with Network Rail regarding use of its assets SWB/B/96-47 and SWM/B/90-40. Provide copies of any further correspondence from Network Rail (and any confirmation if provided) that those assets can accommodate the applicant's construction loads anticipated.	D7	Appendix F has been reinstated as requested in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7) submitted at Deadline 7. This provides confirmation that Network Rail's assets can accommodate the Applicant's anticipated construction loads.
16.	Applicant	Submit swept path evidence to both the ExA, SLD, Chippenham Without Parish council and Wiltshire Council, which confirms that site access for vehicles travelling north of the B4039 and then right on to Fowlswick Lane, is suitable for AILs.	D7	Drawing SP58 is now included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) submitted at Deadline 7, confirming that site access for vehicles travelling north on the B4039 and then right on to Fowlswick Lane is suitable for the intended size of AIL.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				This information was shared with Chippenham Without Parish Council and Stop Lime Down in the morning of 2 October 2026 before Deadline 7 but acknowledges that in the limited time available those parties may not have had an opportunity to fully review.
17.	Applicant	Resubmit drawing of swept path at Grittleton crossroads, which makes it clearer that the left turn into Alderton Road is suitable for AILs with a tractor at each end (including replacing the diagram in the top right corner to show the correct vehicle being used).	D7	Drawing PL405-A is now included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) submitted at Deadline 7, confirming that the manoeuvre shown is suitable for AILs with a tractor at each end. This includes the replacement of the diagram in the top right corner to show the correct vehicle being used.
18.	Applicant	Provide updates to the oCTMP, oCEMP, oOEMP and oLEMP (and the statement of common ground) capturing the agreed wording with Wiltshire Council which clarifies amongst other things that the access track adjacent to North Bincombe Wood will only be used by agricultural type vehicles to manage the maintenance of the	D7	Following further discussion with Wiltshire Council's arboricultural officers, the Applicant has agreed revised wording to clarify the permitted use and maintenance of the existing access track adjacent to North Bincombe Wood. The agreed wording has been incorporated into the updated Outline Construction Environmental Management Plan [EN010168/APP/7.12] (Revision 8), Outline Operational Environmental Management Plan [EN010168/APP/7.13] (Revision 8) and Outline

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		hedgerow only and that any maintenance to the track that may be required from time to time will use 'no-dig' methods.		Decommissioning Strategy [EN010168/APP/7.14] (Revision 6), as relevant. The management plans now state: <i>"Any repairs to the existing section of access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land and access required by the undertaker for hedgerow and other vegetation management."</i> This wording reflects the agreement reached with Wiltshire Council and provides controls both on the purposes for which the track may be used and on any repairs that may be required from time to time. In particular, use by the undertaker is restricted to access for hedgerow and other vegetation management, while any repairs to the existing track are restricted to the limited, no-dig approach described above.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				Related to this, the Applicant has also confirmed that Access Points 14 and 15 will be used for operational access only. This has been reflected in the updated ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) submitted at Deadline 7. The Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 5) has been updated and resubmitted at Deadline 7 to record the agreed position.
19.	Applicant	Explore and confirm whether banksmen can be used to manage access / egress along the track at Rodbourne (and North Bincombe Wood) at field E6 (access 12) during construction, instead of requiring removal of hedgerow to facilitate a visibility splay to the left of the access into that field. Update access plan accordingly.	D7	Banksmen can be used to manage Access 12 and 13. This has been specified in the updated description of access works provided in Table 13-10 of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) and Table 2 of the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7) submitted at Deadline 7. Drawings PL12 and PL13 in Annex C of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) and Appendix A of the Outline Construction

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				Traffic Management Plan [EN010168/APP/7.22] (Revision 7) have also been updated to specify the use of banksmen and removal of the reference specifying the removal of hedgerow/vegetation.
20.	Applicant	Revisit and update all tables and spreadsheets in ES Chapter 13, ES Appendix 13-1 (Transport assessment) and the oCTMP, in line with the applicant's increased HGV numbers presented in [REP5-107], including but not limited to Tables 13-20, 13-22, 13-23, 13-24, 13-25 and 13-46 of ES Chapter 13, Tables 13-12, 13-16, 13-17 and 13-23 and Annexes E and F of ES Appendix 13-1, and Table 4 of the oCTMP. (N.B. Applicant agreed to provide original and new numbers together in those documents for clarity)	D7	The relevant tables in the following documents have been updated to include the updated trip generation calculations and text: • ES Volume 1, Chapter 13, Transport and Access [EN01068/APP/6.1] (Revision 5); • ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7); and, • Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7). For clarity Table 13-23, Table 13-24 and Table 13-25 of ES Volume 1, Chapter 13, Transport and Access [EN01068/APP/6.1] (Revision 5) and Table 13-29 of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 7) have been updated to show the original and new numbers that were used for assessment in ES Volume 1, Chapter 13,

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				Transport and Access [EN01068/APP/6.1] (Revision 5).