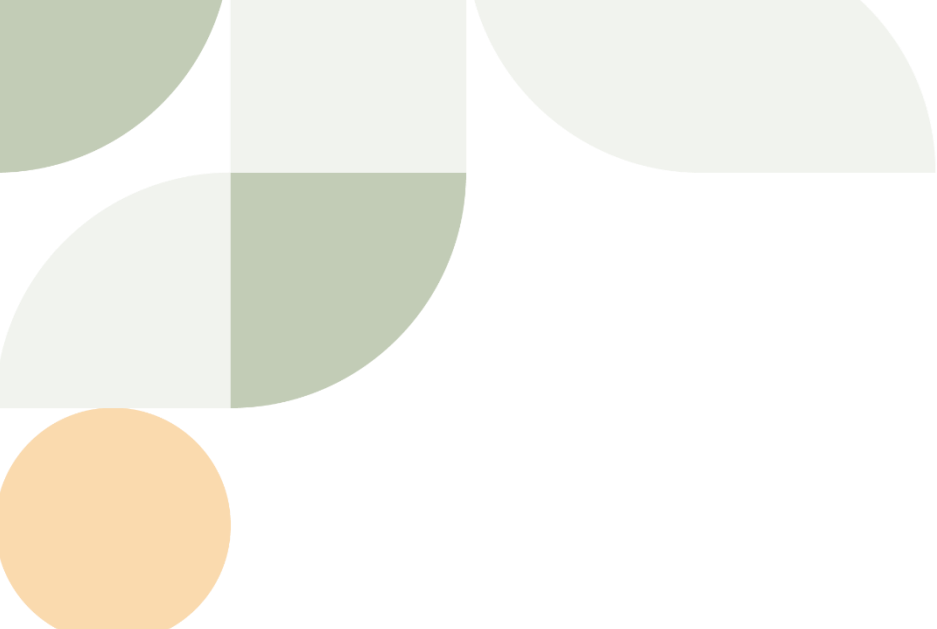




Lime Down

Solar Park

Applicant's Response to SLD Deadline 6 Submission – Transport

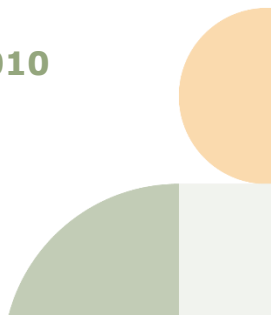
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1 **Introduction**

- 1.1.1 This Technical Note has been prepared on behalf of the Applicant to address matters raised in **Stop Lime Down Deadline 6 Transport Submission [AS-028]**.

2 Response to Stop Lime Down Deadline 6 Transport Submission [AS-028]

2.1.1 Stop Lime Down's (SLD) Written Representation provides comments on the Deadline 5 submissions. These are grouped under the following headers:

- REP5-061 –Transport Assessment;
- REP5-083 – Outline Construction Traffic Management Plan;
- REP5-097 – The Applicant's Response to the Examining Authority's Second Written Questions;
- REP5-107 – Highways Technical Note in Response to Appendix A of SLD Deadline 4 Submissions;
- REP5-098 – Applicant's Response to Submissions Received at Deadline 4; and
- REP5-099 – Tranquillity Assessment.

2.1.2 The comments under each of the above headers are addressed in turn below.

2.2 REP5-061 –Transport Assessment

2.2.1 The Applicant has now routed the AIL vehicle from Access 18 on the A429 to the substation at Lime Down E. The revised route avoids Bincombe Wood and passes directly from Access 12 to Access 13.

2.2.2 The relationship between Access 12 and Access 13 is logical in transport terms where it enables AIL movements to cross the lane in a controlled manner rather than requiring extended travel along a more constrained section of local highway.

2.2.3 For the operational phase, SLD's suggestion that direct access from the A429 only should be used, does not take account of the very low level and infrequent nature of operational traffic. Operational access requirements are materially different from construction access requirements. Occasional maintenance and inspection trips would not generate the same magnitude of impact as construction traffic and therefore do not require the same routing hierarchy. The retained access strategy remains proportionate to the anticipated operational traffic demand. As set out in Table 13-10 of **ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061]**, Access 18 from the A429 will also be used as an operational access. While the access will be permanent, the access track from Access 18 will be removed after construction but reinstated for replacement and

decommissioning. Aggregate from the temporary track will be stored on site.

2.3 REP5-083 – Outline Construction Traffic Management Plan

Number of Modules per HGV

- 2.3.1 The Applicant has now provided evidence to the SLD and WC prior to Deadline 7 from the supplier demonstrating that 720 x 2.7m² panels are delivered in a 40ft high cube container.

Outline CTMP and Adaptive Management

- 2.3.2 SLD characterises adaptive management as a weakness in the CTMP. That is not accepted. For a multi-access construction project, adaptive management is standard and appropriate, provided that the principal mitigation framework is secured and that changes are subject to agreement with the relevant highway authority.
- 2.3.3 The **Outline CTMP [REP5-083]** already identifies the proposed construction routes, access points, holding areas, delivery management arrangements and measures to control HGV movements. The inclusion of mechanisms to respond to unforeseen issues — such as temporary route constraints or the availability of holding areas — is a strength of the management framework. It ensures that the contractor cannot simply continue operating if a route or holding area becomes unsuitable. Instead, deliveries would be paused, re-timed, re-routed where permitted, or managed through measures agreed with the highway authority. In response to Action 10 of ISH6, additional wording on adaptive measures has been included in the **Outline CTMP [EN010168/APP/7.22]** (Revision 7) submitted at Deadline 7.
- 2.3.4 SLD's assertion that every possible adaptive measure must be fully assessed at this stage is not reasonable. The DCO process appropriately secures the principles and parameters of construction traffic management, with the final detailed CTMP to be agreed prior to construction. This underpins by the Rochdale Envelope approach to assessment, and a normal and robust approach for NSIP construction logistics.

AIL routing and swept path analysis

- 2.3.5 SP21-A has been replaced with PL405-B in Annex K of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) and Appendix D of the **Outline CTMP [EN010168/APP/7.22]** (Revision 7) submitted at Deadline 7. Only one tractor is actually needed as the trailers have independent steering for each axle, however the second

tractor is provided and attached for this type of manoeuvre. The rear tractor doesn't go outside of the lines shown on the swept path so has no impact on the swept path in terms of overrunning areas.

- 2.3.6 Drawings PL401, PL402, PL403, PL405 and PL407 provided in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) show enough room on the OS to be confident the manoeuvres work.
- 2.3.7 Drawing PL404-B in Annex K of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) and Appendix D of the **Outline CTMP [EN010168/APP/7.22]** (Revision 7) submitted at Deadline 7 has been prepared using topographical survey base and demonstrates that the manoeuvre can be undertaken within the existing extent of public highway.
- 2.3.8 Drawing SP406-A-B in Annex K of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) and Appendix D of the **Outline CTMP [EN010168/APP/7.22]** (Revision 7) submitted at Deadline 7 has been prepared using a topographical survey base and demonstrates that the manoeuvre can be undertaken and that no tree loss is required.
- 2.3.9 In relation to comments on Drawing SP33, the western side of the bend will be overrun slightly so plates will need to be put down. This will be dealt with under the special-order licence.
- 2.3.10 Drawing SP22 includes OS but does not use the widened area in question. The Applicant has included a swept-path of a girder frame vehicle which the largest of the AIL vehicles. In reality the vehicle will be smaller, so the Applicant is confident the manoeuvre will work.
- 2.3.11 The final route proving, detailed pre-movement surveys, temporary traffic management and liaison with the relevant highway authorities and police/escort providers is all required to obtain the special-order licence. AIL movements are infrequent, planned well in advance, and subject to specific management controls. They are not comparable with daily construction HGV traffic.

Comparison of the information in Annex A of the Outline Ecological Protection and Mitigation Strategy [REP5-082]

- 2.3.12 Access 10 includes an area for swept path of an AIL that hasn't been included in the hedgerow loss. Access 10 is the only location with a hatched 'overhang area' on the drawings. The 14 m removal extent (7 m either side of the existing gateway) is broadly correct based purely on the vehicle movement analysis. The hedge is set back a few metres from the road and from the widest point of the bellmouth. However, it appears

that the 'abnormal load overhang' has been overlooked and was not included in this calculation, this has been corrected in the Deadline 7 submission. The diagram below shows a yellow line for the hedge location. This has been updated for Deadline 7, including associated updates to the **BNG Assessment Report [EN010168/APP/7.8]** (Revision 6), **Outline EPMS [EN010168/APP/7.19]** (Revision 7) and **ES Volume 1, Chapter 9 Ecology and Biodiversity [EN010168/APP/6.1]** (Revision 4) to reflect the correct hedgerow removal extent.

Access 10 – circa 14m hedge removed plus 9m for AIL overhang (to be updated)



2.4 REP5-097 – The Applicant's Response to the Examining Authority's Second Written Questions

TT2.3 OCTMP1 Adaptive Management

- 2.4.1 TPA's response in relation to adaptive management is set out in section 2.3 above.

TT2.4 OCTMP2 Impact on Junctions 17 and 18

- 2.4.2 Flows at motorway junctions before 0930 will be minimal as journey time to Lime Down A is 20 minutes from M4 Junction 18 and 8 minutes to Lime Down D (West) from M4 Junction 17.
- 2.4.3 In accordance with the average hourly HGV flows based on the construction programme and presented in Annex F of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision

7), there would be four HGV movements at Junction 17 and two HGV movements at Junction 18 before 09:30. This is negligible and well within daily variation.

TT2.7 Highway Improvement Areas 3

- 2.4.4 With regards to fear and intimidation, the low level of change in traffic flows will not result in a step change in the level of fear and intimidation magnitude in line with the ISEP guidance.
- 2.4.5 The assessment demonstrated that, although construction traffic would increase HGV flows, the magnitude of change is insufficient to result in a material change in the level of fear and intimidation when assessed against the ISEP methodology.
- 2.4.6 The Applicant does not contend that pedestrians walking along the carriageway are unaffected by traffic. Pedestrians already walk in the carriageway under baseline conditions, then that lack of footway exists in both the baseline; and the construction scenario.
- 2.4.7 Rather, the assessment concludes that the increase in traffic arising from the Scheme would not materially alter existing conditions to such an extent that a significant environmental effect would arise as the fear and intimidation calculation shows no step change in level based on increased traffic flow, HGV flow and vehicle speed. SLD has not identified evidence demonstrating a step change in conditions arising from the Scheme.
- 2.4.8 SLD places considerable emphasis on road width and the interaction between HGVs and non-motorised users. The Applicant recognises that parts of the local network are rural in character and that some links require careful management. That is why the **Outline CTMP [REP6-041]** includes measures such as routeing controls, delivery booking, timing restrictions, holding areas, banksmen or marshals where required, and temporary traffic management.
- 2.4.9 SLD's position appears to assume that any introduction of construction HGV traffic onto a rural lane necessarily creates an unacceptable safety effect. However, the assessment must consider the magnitude, duration and frequency of traffic, the baseline use of the route, the availability of management measures, and the residual effect after mitigation.
- 2.4.10 The use of rural roads for temporary construction access is not inherently unacceptable.
- 2.4.11 What matters is whether traffic can be managed safely and whether appropriate controls are secured. The Applicant's assessment and **Outline CTMP [REP6-041]** show that this can be achieved.

TT2.8 Grittleton Crossroads AIL Swept Path

- 2.4.12 The Applicant's response in relation to the AIL swept path at Grittleton Crossroads is set out in section 2.3 above.

TT2.9 Width of Construction Routes

- 2.4.13 The topographical surveys on which the drawings are based, are highly accurate. To produce the survey, the third-party surveyor used equipment with an accuracy of +/-1mm to traverse the length of the carriageway. It has been orientated and controlled using GPS with an accuracy of +/-10mm through the total length of the survey area.
- 2.4.14 The survey accounts for the width of the highway, including the gravelled edges and unmade edges which are used by existing traffic and are considered to be usable highway.
- 2.4.15 The Applicant's view is that the construction route and proposed mitigation measures are suitable to facilitate the Scheme.
- 2.4.16 Further to meetings with Wiltshire Council and Action 8 of ISH6, the Applicant has included further indicative minor widening works at the request of Wiltshire Council. These works can be delivered:
- within the public highway.
 - within existing grass verge
 - without impact on existing trees or hedgerows
- 2.4.17 The minor widening works include the following:
- Three locations on Fosse Way within the longest lengths of intervisibility. These are shown in Drawings PL310-PL312 in Annex O of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7.
 - Two locations on Bradfield Cottages. These locations are shown in Drawings PL313 and PL314 in Annex O **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7.

TT2.10 Fowlswick Lane Access 109

- 2.4.18 At Access 109, the Applicant has calculated approximately 18 metres of hedgerow removal. This has been measured from the centreline of the hedge which is slightly set back from the road. This is correct, while acknowledging there is the possibility of a minor discrepancy of a couple of metres due to georeferencing differences and different parties mapping.

- 2.4.19 As noted in Drawing PL109 in Annex D and in Table 13-11 of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7), the access will be managed by banksmen, to assist vehicles entering and exiting the site.

TT2.12 Shuttle Bus Take-Up 2

- 2.4.20 The Applicant has not relied on shuttle bus use as the sole mitigation measure for worker traffic rather included it as it is a common addition for DCO solar farms of this scale. The Applicant has taken a peak day LV flow and applied it to every day of construction phase in its assessment which is overly robust but allows a large buffer. LV worker trips are outside of the network peak hours and are unlikely to have an effect on existing link capacities.
- 2.4.21 For schemes of this nature, future worker mode share can only be forecast. It is not reasonable to expect observed behaviour from the Proposed Development before construction has commenced.
- 2.4.22 Worker trips were based on a breakdown of worker trips provided by a contractor based on the draft layouts and programme. These have been updated for Deadline 7 and presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7). The peaks for each construction route are now presented in Table 13-18 of the same document.
- 2.4.23 Socio-Economic chapter states that on a peak day, 59.5% are estimated to relocate from across the UK to the Study Area, private rental accommodation, hotels and serviced accommodation. Based on 40.5% workers in the Study Area already working in the 'Construction of utility projects' employment subsector.
- 2.4.24 Whilst the shuttle bus will be available for all workers it is expected that it will primarily serve the 59.5% as these will be workers staying known locations in larger groups and suitable pick up and drop off shuttle bus points can be easily arranged.
- 2.4.25 Examples of percentage shuttle bus use for consented DCO solar farms include:
- West Burton Solar Farm (PINS reference EN010132) – 50% arriving by shuttle bus; and
 - Cottam Solar Farm (PINS reference EN010133) – 50% arriving by shuttle bus.
 - Gate Burton Energy Park (PINS reference EN010131) – 55% arriving by shuttle bus

- Beacon Fen Energy Park (PINS reference EN010151) – 55% arriving by shuttle bus
- Tillbridge Solar Project (PINS reference EN010142)– 47% arriving by shuttle bus
- Stonestreet Green Solar (PINS reference EN010135) – 75% arriving by shuttle bus
- Longfield Solar Farm (PINS reference EN010118) – 55% arriving by shuttle bus
- Cleve Hill Solar Park (PINS reference EN010085) – 100% arriving by shuttle bus

2.4.26 Based on this, the assumption of 50% shuttle bus usage is justified, with potential for shuttle bus usage to be higher, and for it to also serve local workers. The shuttle bus will be managed through measures set out in the Construction Worker Travel Plan, which will form part of the Final CTMP. This will include details on pick-up and drop-off locations and limits placed on on-site contractor parking provision.

2.4.27 Even if shuttle bus take-up were lower than forecast, the management framework would allow corrective measures to be implemented, including increased shuttle provision, revised worker parking controls or further restrictions on private car access where necessary.

2.4.28 In response to Action 11 of ISH6, the **Outline CTMP [EN010168/APP/7.22]** (Revision 7) submitted at Deadline 7 requires the Travel Plan Coordinator to provide the highway authority with data on the actual shuttle bus uptake during the construction phase.

TT2.13 Construction Phasing

2.4.29 SLD notes that extending the 400kV substation construction period reduces daily HGV flows and worker trips but extends the period over which movements occur. That is correct, but from a highway capacity, safety and amenity perspective, daily flow is a key determinant of effect. A longer construction period with lower daily movements may reduce the intensity of impact compared with a shorter programme with higher daily movements.

2.4.30 The assessment appropriately considers both magnitude and duration. Where daily movements reduce, the potential for peak-day network stress, HGV interaction and localised operational issues also reduces. The fact that works continue for longer does not automatically mean the effect becomes unacceptable, particularly where movements remain controlled through the CTMP.

- 2.4.31 Calculations relating to worker trips have been updated for Deadline 7 and presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7). The peaks for each construction route are now presented in Table 13-18 of the same document.

2.5 REP5-107 – Highways Technical Note in Response to Appendix A of SLD Deadline 4 Submissions

HGV Trip Generation and Revised Calculations

- 2.5.1 The increase in total HGV trip generation should not be presented as evidence that the assessment is unreliable. It demonstrates that the Applicant has responded to comments, reviewed assumptions and adopted updated figures where appropriate and obtained further information through and from commitments and conversation with suppliers that would normally be carried out at the detailed design stage.
- 2.5.2 Previously the Applicant had applied buffers such as the AADT assumption to account for any increases in AADT's that this more detailed information that would be available at the detailed design stage.
- 2.5.3 The key issue is not whether the figures have changed, but whether the updated assessment remains within an acceptable and manageable transport envelope. The revised HGV numbers are still capable of being accommodated with the proposed routing, access and management measures.
- 2.5.4 SLD's suggested alternative calculations are not necessarily more robust simply because they generate higher totals. In several cases, they appear to rely on broad comparisons with other solar schemes, assumptions about construction methodology, or extrapolations that may not reflect the specific design, layout, procurement strategy or construction approach for Lime Down.
- 2.5.5 SLD's original calculations in the **Transport Report [REP1-172]** stated 65,813 HGV movements, this was then lowered to 47,501 HGV movements in SLD's **Post hearing submission [REP4-132]** at Deadline 4 and now 44,308 HGV movements in SLD's **Transport Submission [AS-028]**. The numbers presented by SLD in Appendix A of the **Transport Submission [AS-028]** are not agreed. Further explanation of this is provided as follows.

Solar Panel Deliveries and 720 panels per HGV

- 2.5.6 The criticism of the 720 panels per HGV assumption is not persuasive. The Applicant has identified that high cube containers would be used where necessary and has secured this through the CTMP. The use of high

cube containers is a practical logistics measure designed to reduce the number of HGV deliveries, and the Applicant has stated that the assumption has been confirmed by manufacturer/supplier information

2.5.7 SLD's comparison between standard container height and high cube container height is too simplistic. Container loading capacity is not governed only by the proportional increase in height. It is also affected by panel dimensions, packaging configuration, palletisation, stacking arrangement, void space, loading method and supplier-specific packing design. A simple percentage comparison of container height therefore does not demonstrate that 720 panels cannot be carried.

2.5.8 The Applicant has now provided evidence to the SLD and WC prior to Deadline 7 demonstrating that it is possible to transport 720 x 2.7m² panels in a 40ft high cube container.

Mounting Structure Deliveries

2.5.9 SLD's challenge to the mounting structure delivery assumption is similarly overstated. The Applicant has obtained further information from the manufacturer/supplier confirming that mounting structures for 0.9–1.1MW of 640W solar panels can be transported per standard articulated flatbed. By adopting the lower end of that range, the Applicant has taken a conservative approach.

2.5.10 SLD's reliance on ratios from other schemes is not determinative. Mounting structure quantities and vehicle loads will vary depending on the selected mounting system, supplier, pile design, module arrangement, packaging approach, frame materials and construction methodology. It is therefore more appropriate to rely on supplier-specific information for the Proposed Development than on generic comparisons with other schemes.

Comparisons with other solar schemes

2.5.11 SLD places significant weight on comparisons with Cottam, West Burton, Green Hill, Botley West and Heckington Fen. Those comparisons have limited evidential value unless the schemes are directly comparable in terms of site layout, technology, panel density, access strategy, construction methodology, procurement assumptions, packaging arrangements, BESS configuration and substations.

2.5.12 Simply comparing the proportion of total HGVs attributed to panels and mounting structures does not demonstrate under-estimation. A lower percentage may reflect higher HGV totals in other categories, different accounting methods, different assumptions about waste, different BESS/substation requirements, or different construction approaches. It does not necessarily mean that panel and mounting structure deliveries are understated.

- 2.5.13 The Applicant's project-specific assumptions should therefore be preferred over broad cross-scheme ratios.
- 2.5.14 Notwithstanding the above and in response to Action 2 of ISH6, Table 2-1 of the **Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107]** has been updated and now resubmitted at Deadline 7 **[EN010168/APP/9.64]** (Revision 2). This now removes the waste and packing trips associated with the Lime Down scheme and exclusively refers to Solar Panels and Modules. The updated table still demonstrates the schemes are comparable.

Reasonable Worst Case

- 2.5.15 SLD repeatedly asserts that the Applicant has failed to assess a reasonable worst case. That is not accepted. A reasonable worst case does not mean the absolute theoretical maximum for every individual assumption combined together. It means a realistic, robust and precautionary assessment scenario based on credible construction parameters.
- 2.5.16 The Applicant has updated its assumptions where appropriate, included additional HGV categories, considered peak daily flows, and secured management measures through the CTMP. This is consistent with a reasonable worst-case assessment. By contrast, SLD's approach risks combining pessimistic assumptions from multiple sources without demonstrating that they would realistically occur together for this scheme.
- 2.5.17 For reference, The Applicants final trip generation calculations are presented in Annex E and Table 13-12 of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7.

2.6 REP5-098 – Applicant's Response to Submissions Received at Deadline 4

SLD-006 and others

- 2.6.1 SLD is incorrect in its conclusion regarding daily HGV flows. This is demonstrated by Tables 13-14 and 13-15 in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7, which shows that when taking into account the construction program peak and average Daily HGV construction movements are lower than the flows assessed within **ES Volume 1, Chapter 13, Transport and Access [REP4-014]**.

SLD-011 Transport of Machinery and Equipment

- 2.6.2 As requested by the ExA, the Applicant provided a like-for-like comparison with SLD within the updated trip generation calculations. As clarified in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) submitted at Deadline 7, servicing trips associated with the compound include for the transport of machinery and equipment.
- 2.6.3 It should be noted that SLDs original trips for machinery and equipment set out in SLD's **Transport Report [REP1-172]**, total just 20 per compound. These have now been updated to a total 800 HGVs in SLD's **Transport submission [AS-028]**.
- 2.6.4 It is considered that the total of 2,332 HGV deliveries for compounding servicing trips (including plant and machinery) provides a worst-case scenario.

SLD-017 Chances of HGVs Meeting

- 2.6.5 It is noted that the chances of HGVs meeting on Fosse Way and Bradfield Cottages is agreed. The probability calculations have now been updated to account for the updated trip generation calculations presented in Annex E and Table 13-12 of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** (Revision 7) as well as the updated hourly flows presented in Annex F.

SLD-021 Visibility/Road Widths

- 2.6.6 The Applicant explanation in relation to visibility/road widths and proposed widening on construction routes is as set out in response to TT2.9 Width of Construction Routes above.

SLD-025 Road Width and Sensitivity

- 2.6.7 The Applicant's response in relation to road width and sensitivity is set out in section 2.4 above.

2.7 REP5-099 Tranquillity Assessment

- 2.7.1 The Applicant has considered transport as part of **Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099]** and its position remains unchanged. It is also the Applicant's position that the routes through the CNL that experience increases in excess of 100% all have low existing Daily HGV flows (B4039 (66) Road West of Grittleton (49), Alderton Road (20) and Fosse Way (21)). The use of the B4040 and B4039 have been identified

as they are B-roads designed to accommodate higher volumes of vehicular movement and HGVs.

3 Conclusion

- 3.1.1 The SLD rebuttal does not demonstrate that the Lime Down transport assessment is fundamentally flawed. Many of the points raised are either matters of clarification, matters already addressed through the Applicant's submissions, or detailed construction management issues that can appropriately be secured through the final CTMP and associated controls.
- 3.1.2 The Applicant's revised evidence demonstrates that construction traffic has been assessed using updated and precautionary assumptions, that access arrangements are capable of being delivered, and that HGV movements can be managed safely through routing, timing, holding, traffic control and monitoring measures. The residual transport effects therefore remain capable of being appropriately mitigated and do not justify a finding that the Proposed Development is unacceptable in transport terms.