

**Hullavington Parish Council
Closing Statement**

**Lime Down Solar Farm: Application Reference EN010168
Deadline 8, 16th October 2026**

1. Introduction

1.1 Hullavington Parish Council ("the Parish Council") submits this closing statement on behalf of the residents of Hullavington. It concerns the construction traffic impacts of the Proposed Development on Norton Road, at the end of The Street and running north towards Bradfield Cottages, and on the Hullavington crossroads.

1.2 The Parish Council's concerns have been put to the Examining Authority consistently, most recently in its Deadline 7 submission. The Applicant has not resolved them. They are shared in important respects by the local highway authority, Wiltshire Council.

2. The Applicant has not demonstrated that this route is safe for active travellers given the conflicts caused by the construction traffic

2.1 In the Statement of Common Ground with Wiltshire Council (Rev 5) [EN010168/APP/8.2], Wiltshire Council states that the sensitivity classification of the construction routes to Lime Down Sites A–C and D–E "does not address highway safety or operational impacts". It states that evidence is still required to demonstrate adequate passing opportunities for two HGVs along the entire access route.

2.2 Wiltshire Council also disagrees with the Applicant's assessment of minor adverse impacts on the Fosse Way. It cites the narrow carriageway and long sections with limited passing opportunities. It notes that the route from Dyson Roundabout to Bradfield Cottages has not been assessed, despite predicted high HGV flows and concerns about two-way HGV passage, "particularly northwest of the Hullavington crossroads".

2.3 In its Comments on Submissions Received at Deadline 6 and 6B (submitted for Deadline 7, 2 October 2026), Wiltshire Council again drew attention to "un-metalled highway surfaces forming part of the construction route, east of Hullavington crossroads" [sic].

2.4 The Applicant has not answered these points. It classes the section between Hullavington crossroads and Bradfield Cottages as "Low" sensitivity because, in its view, the section contains no additional receptors beyond those between the A429 and the crossroads. That is a classification exercise. It does not answer the highway safety question the highway authority has asked.

3. The receptors on this road are people on foot and on bicycles

3.1 The classification is also wrong on its own terms. The three-quarter mile section either side of the railway bridge is the shortest and, in most cases, the only route for pedestrians between ten well-used footpaths, tracks and entrances: footpaths HULL4, HULL5, HULL8, HULL9 and HULL29; the track to footpaths HULL6 and HULL7; the entrance track to the Flying Monk Café and Tap; the entrance to Brookside housing; the entrance to the cottages by the Old Railway Yard; and the permissive footpath immediately south of the railway bridge.

3.2 The road has no footways. Visibility is poor because of a series of bends. It is derestricted, subject to the national speed limit, and increasingly used by heavy and light vehicles, many travelling at speed. Residents report near misses with passing vehicles, and others are deterred from walking here at all. The Tap has built a client base of cyclists who regularly use the road. There is already a pinch point at Brookside where near misses and minor collisions occur, and collisions have also occurred at the T-junction from the village. This is the commuting route for cyclists from Hullavington to Malmesbury.

3.3 These are existing risks, before any impact from the Proposed Development. The Parish Council has been in discussion with Wiltshire Council about them. The Applicant proposes to add substantial HGV traffic to a road that is already unsafe for those who use it on foot and by bicycle.

4. The Applicant's proposed mitigation in removing parts of the verge would make matters worse

4.1 The Applicant's response to Wiltshire Council's concerns about passing opportunities is widening and passing places. The Parish Council is seriously troubled by suggestions made at the hearing that verges should

be removed. For pedestrians on this road, the verge is the only place to step out of the path of oncoming traffic. A resident has previously strimmed it between cuts so that walkers can get clear of fast-moving vehicles.

4.2 Widening at the expense of the verge would:

- leave pedestrians with nowhere to escape when confronted by vehicles;
- reduce visibility further for people walking towards the village, because the road and verge are not straight and oncoming vehicles would be out of sight;
- create a new pinch point at the railway bridge, which cannot be altered, where large vehicles already pass in the centre of the road and come into conflict with traffic from Norton;
- add to the existing hazard at Brookside, where visibility towards the village is already so poor that drivers must wind down their windows to listen for traffic; and
- encourage faster driving on a road where speed is already a principal danger.

4.3 The Applicant's other commitment, road condition surveys and repair of verge damage with details to follow in a Final CTMP, does not meet these concerns. It addresses damage to the road after the event. It does not show that the route can be used safely by construction traffic and by the people who walk and cycle on it.

5. Wider infrastructure pressures

5.1 The Parish Council also notes the local infrastructure concerns cross-referenced in the submissions. Wessex Water has cited groundwater entering the foul drainage pipes, causing overflows and untreated sewage discharge at the Hullavington sewage treatment works when it is overwhelmed. The Applicant has not demonstrated that construction activity will avoid worsening conditions in a village whose drainage infrastructure is already under strain.

6. Conclusion and requests to the Examining Authority

6.1 The Parish Council's position is that:

- the Applicant has not demonstrated that the route between Hullavington crossroads and Bradfield Cottages can safely accommodate construction traffic, including two-way HGV passage;
- the "Low" sensitivity classification is unsound, because the route is the principal means of access on foot between ten footpaths, tracks and entrances, and is used by cyclists;
- the Applicant's proposed widening would increase the danger to pedestrians and cyclists by removing the verge, reducing visibility and creating a further pinch point at the railway bridge; and
- the un-metalled surfaces on the construction route, and the drainage and sewage concerns, remain unaddressed.

6.2 The Parish Council therefore asks the Examining Authority to:

- give significant weight to the unresolved concerns of the local highway authority;
- find that the impacts on Norton Road and the Hullavington crossroads have not been adequately assessed or mitigated; and
- if it is minded to recommend that consent be granted, recommend that the Secretary of State impose requirements that:
 - prevent any widening that removes the verge on this section;
 - prevent construction traffic using this section unless and until measures to protect pedestrians and cyclists, for example a reduced speed limit and a safe pedestrian refuge or footway, have been approved by Wiltshire Council in consultation with the Parish Council; and
 - secure binding road condition surveys and reinstatement.

6.3 The Parish Council asks the Examining Authority to remember the residents who use this route on foot and by bicycle when considering it.

6.4 The Parish Council thanks the Examining Authority for the opportunity to participate in the Examination.

Hullavington Parish Council - [REDACTED]