

Highway Comments

Application No: PL/2025/05830

Application Location: Land at Flaxlands Farm, Royal Wootton Bassett, Swindon, SN4 8DY

Application Description: The construction and operation (including maintenance) of a 49.9MW solar farm to include ground mounted solar photovoltaic (PV) arrays, electrical substations, grid balancing infrastructure, cabling, BESS (49.9MW capacity), communications tower, other associated infrastructure and areas for biodiversity net gain (BNG) enhancement and landscape mitigation

Date of Comments: 19th September 2025

HDC Officer: David Lear

I refer to the full planning application PL-2025-05830 in respect of land at Flaxlands Farm, Royal Wootton Bassett, Swindon. This relates to the development of a new 49.9MW solar farm including include ground mounted solar photovoltaic (PV) arrays, electrical substations, grid balancing infrastructure, cabling, BESS (49.9MW capacity), communications tower, other associated infrastructure.

I have reviewed the following highway documents duly submitted to support the application:

- Site Location Plan
- Proposed Site Plan (Concept Design)
- Transport Statement - Parts 1 to 6
- Access Track Details
- Access Gate Elevation Details
- Flaxlands Lane Temporary Passing Bays: Drawing No: ACM-XX-XX-DR-CE-00-0003
- Framework Construction Traffic Management Plan (CTMP)

Comments are set out below.

Site Location Plan

It is noted that the development site straddles Flaxlands Lane, with the closest category of higher standard roads being the B4042 Brinkworth Road and the B4696 Lydiard Plain on the western side of the site. Flaxlands Lane itself is a narrow rural road with a typical width which is incapable of passing two light vehicles on long sections and has relatively limited passing bay provision. Examination on Goggle Streetview suggests that bays where present would in most cases not facilitate the passage of an HGV and a car, and certainly not two HGVs.

Proposed Site Plan

No specific comments on the site layout, bar noting that the intended means of access is from the east via Greatfield Road through Hook. This will result in an intensification in traffic usage at the Flaxlands Lane junction with Greatfield Road, where the visibility to the right from the Flaxland Lane 'give way' line is very restricted. This will be a concern with HGVs attempting to execute the right turn from Flaxlands Lane, particularly as such vehicles will need a larger 'gap' in opposing traffic to safely execute the exit movement. The intent to upgrade the part of Flaxlands Lane between this junction and an existing access track some 1.1km to the west is noted, notably the additional of several extended passing bays. I comment on this later is reviewing the Transport Statement and notably Drawing No ACM-XX-XX-DR-CE-00-0003.

Transport Statement

Section 1: Introduction

Para 1.1.3 under 'Context' states that *"The Proposed Development has demonstrated to a relatively low level of vehicular activity, during the construction, operational and decommissioning phases. The construction phase is expected to last approximately 6 months in total with approximately 14 daily two-way HGV movements and 40 daily twoway staff vehicle movements each day"*. However, Section 5 provides no breakdown of the numbers of HGV's and types expected over the construction period, and how this has been used to derive the daily number of expected movements. In short, it is unclear how the projected number of HGV movements associated with the construction activities has been derived, so supporting calculations are needed to 'prove' the numbers based on the expected materials quantum and the expected disposal of any spoil off-site.

Section 2: Existing Site and Accessibility

It is noted in paragraph 2.2.4 that the existing access to the western field parcel is via an existing cross-over access to Flaxlands Field Farm which is indicated in 'blue' on Figure 2.1. However, whilst it is apparent where this is; this access point is not indicated in blue on the figure. It is noted that using this existing access will require HGV trafficking along a much longer length of Flaxlands Lane from the east than would, say, be required by optionally forming a new access adjacent to that serving the eastern field parcel.

It is noted that Flaxlands Lane has an existing 7.5T weight restriction in force but with an 'Except for Access' exemption. However, given the level of HGV trafficking expected over the full duration of the construction period it is considered that it would be desirable to limit the length of routing needed along the lane from its junction with Greatfield Road if possible.

No traffic counts are presented in the Transport Statement, so it is unclear what existing volume of traffic uses Flaxlands Lane or its composition. In short, it is unclear what frequency of 'opposing' vehicle traffic may be present when a 16.5m HGV makes its inward or outward journey along Flaxlands Lane.

Section 3: Planning Policy Review

No specific comments.

Section 4: Development Proposals

The position of the main compound (**Appendix A**) to the east of the existing access track serving the western field parcel increases the route length penetration needed along Flaxlands Lane needed by most if not all HGV movements. It is also unclear whether materials will then need to be moved from this compound back to the eastern field parcel. This is of concern as the horizontal alignment of Flaxlands lane gets more sinuous towards this western end, and the passing bay improvements as proposed do not include anything on this last circa 250m length.

It is stated and noted that no Abnormal Load Vehicles are expected to be needed, not even for the BESS units.

Drawing No: ACM-XX-XX-DR-CE-00-0003/P04, which forms part of **Appendix B**, shows 'sketch' details of 6nr proposed passing bays along Flaxlands Lane. The Inset plans on this drawing suggest that planned works will ensure that it will be possible to pass two articulated HGVs at each point. Although intended to be temporary, the applicant should be advised that full details of all these works will be

required to be submitted as part of subsequent s278 Agreement approval, and the 'base' used will need to be a full topographical survey as the OS land-line mapping is unlikely to be sufficiently accurate. It remains unclear to what extent the areas of widening shown will impact upon any existing drainage ditches running along the sides of the carriageway each side, and potential loss of hedgerow. In short, what might be viewed as possible in looking at space available within the existing highway on an OS Landline plan may be different when locations are examined in detail. Drawing No ACM-XX-XX-DR-CE-00-0005 shows the intended position of the new access to Flaxlands Lane serving the eastern part of the western land parcel, which is close to proposed passing bay 5. As noted in earlier comment, I would prefer to see this used to serve the whole of the western land parcel, so limiting the extent to which HGVs need to route along Flaxlands Lane to the west. It would also negate the need for providing passing bays at Locations 5 and 6. It would require relocating the main compound to a position by this access, and the construction of an additional temporary length of access track/haul road to the main BESS location along the southern edge of the identified BNG area. However, from the Highways perspective, the trafficking by HGVs in the Construction Phase should be seeking to limit the length of Flaxlands Lane which needs to be used.

Section 5: Trip Attraction

Construction Phase

As noted previously, there needs to be proper breakdown of the numbers of HGV's and types expected over the entire construction period, and how this has been used to derive the daily number of expected movements set out in paragraph 5.2.3. Supporting information is also required to indicate how the projected numbers of HGV movements/types associated with the various construction activities have been derived, so calculations are needed to 'prove' the numbers based on the expected materials quantum and the expected disposal of any spoil off-site. Having reviewed other Solar Farm applications a tabular breakdown is normally provided for expected HGV moments, given this is often the most sensitive issue where necessary construction access is via narrow rural roads.

Paragraph 5.2.7 states that "*A maximum of 80 construction workers are anticipated to be on-site during the peak times during the construction period equating to a maximum of 40 staff vehicles anticipated to attend site each day 80 daily two-way trips) during the peak times of the construction period*". On the assumption that most operatives will probably drive to the site, a 50% non-car mode share for travel to be site seems very high. Assuming most do drive and are single occupant journeys, then the number of two-way movements per day could well be double. This will clearly impact on the level of on-site parking which would need to be provided on-site to cater for the workforce, this additional to parking needed to accommodate both LGV and HGV deliveries. I am less concerned about the operational impact of this generated light vehicle traffic on the wider network.

Operational Phase

I have no issues with expected trafficking during the operational phase, or indeed the use of the existing access track to Flaxlands Field Farm as the future access to the western field parcel and the BESS units.

Decommissioning Phase

No specific comments. Clearly any temporary highway works along Flaxlands Lane put in place to facilitate HGV access during construction would need to be reinstated or potentially adapted based on any lessons learnt.

Section 6: Vehicle types, Routing and Access

Vehicle Types

With regards to sub-section 6.2 'Vehicle Types' and expressly HGVs, see previous comments. We need to see an estimate of the heavy vehicle types by number over the construction and how these numbers for specific types have been derived. There should be sufficient information to enable the numbers of Solar Farm component types to be identified, and the volume of stone to be imported to construct the access tracks and other hard-standing areas proposed for the BESS units and the compound.

Swept Path Analysis

Paragraph 6.5.2 states that *"it is proposed to construct seven temporary passing bays, with one approximately every 150 meters between Greatfield and the western site access"*. However, only six proposed locations are indicated on Drawing No: ACM-XX-XX-DR-CE-00-0003/P04 in Appendix B. As previously noted, I would wish to see the extent of the lane used for construction access reduced if possible.

It is further stated that *"These bays would be installed prior to the start of main construction, utilising 3-dimensional load bearing surface (such as cellweb or similar) to protect the soil within the Root Protection Areas (RPA) of retained trees from compaction, and removed once it is completed"*. However, as noted earlier, all these construction drawings using a suitable topographical base would need to be submitted for technical approval as part of a s278 Agreement. The drawing in Appendix B only shows the plan view extents of the length/width of widening based on the swept paths of two HGVs attempting to pass. Whatever construction method and 'tie-in' to the existing road pavement is used, it should be remembered that it will have to accommodate the axle loadings from 38 tonne 16.5m long articulated HGVs. This might be considered another good reason for seeking to reduce the number of bays it is required to construct along Flaxlands Lane.

Notwithstanding the creation of new passing places, I consider pre-construction and post-construction highway condition surveys will be required along the length of Flaxlands Lane affected by construction trafficking, and this included in subsequent Conditions. This need and definition will need to be line with the provisions set out in Section 59 of the Highways Act, so where it is reasonable to infer that the expected HGV trafficking is 'extraordinary traffic' causing damage to parts of the publicly maintained highway beyond normally expected 'wear and tear'.

Site Access

Paragraph 6.6.4 which discusses the eastern site access states *"The site access will be widened as required and will be in the form of a dropped kerb vehicle crossover junction"*. These details will need to be submitted and approved by Highways, and logically as part of the same s278 technical approval process needed for the passing bay works. The restricted existing visibility to the left from this field gate of 2.4m x 60m is noted. Whilst it accepted that using a banksman to assist exiting vehicles, notably HGVs, is a possible solution and the actual vehicle speeds on Flaxlands Lane are likely to be low, it is noted that the applicant does have land control to improve the splay in this direction. This opportunity can be considered when the construction details of the access changes here are submitted for Technical Approval.

Details of the new access to the western field parcel shown on Drawing No ACM-XX-XX-DR-CE-00-0010 in Appendix B are noted. In view of the likely actual speeds on Flaxlands Lane, I am satisfied that the 'Y' distances of 160.0m and 141.5m associated with these visibility splays will be more than adequate. However, I am unclear what degree of existing hedgerow or tree removal will be required to achieve these. Again, full details of the new access changes including construction make-up will need to be

submitted for s278 technical approval. This will need to show the said splays and any vegetation clearance required.

Paragraph 6.6.8 discusses the western access via the existing farm access, and changes needed to it. However, I don't as previously stated favour the use of this track during the construction phase and would like to see a different approach adopted to accessing the BESS location and the western part of the site during this phase.

Framework Construction Traffic Management Plan

As I am suggesting changes to the proposed access strategy during the construction phase I do not offer much in the way of comment on the FCTMP at this stage. It is noted that a large part of this reproduces information in the Transport Assessment. To reiterate:

- I am concerned with the intensification in traffic usage at the Flaxlands Lane junction with Greatfield Road, where the visibility to the right from the Flaxland Lane 'give way' line is very restricted. This is a concern with HGVs attempting to execute the right turn from Flaxlands Lane, particularly as such vehicles will need a larger 'gap' in opposing traffic to safely execute the exit movement. However, there is no mention of TTM which might require temporary traffic signals here during the construction period.
- The position of the main compound to the east of the existing access track serving the western field parcel increases the necessary route length penetration along Flaxlands Lane needed by most if not all HGV movements. I would prefer to see the new northern access proposed to the east used to serve the whole of the western land parcel during the construction phase, so limiting the extent to which HGVs need to route along Flaxlands Lane to the west. It would also negate the need for providing passing bays at Locations 5 and 6. It would require relocating the main compound to a position by this new access, and the construction of an additional temporary length of access track/haul road to the main BESS location along the southern edge of the identified BNG area. However, from the Highways perspective, the trafficking by HGVs in the Construction Phase should be seeking to limit the length of Flaxlands Lane which needs to be used.

Summary

The key points emerging from the Highway review are as follows:

- I am concerned with the intensification in traffic usage at the Flaxlands Lane junction with Greatfield Road, where the visibility to the right from the Flaxland Lane 'give way' line is very restricted. In short, I consider TTM is going to be needed to assist HGV exit during the construction phase.
- I would prefer to see the new proposed northern access used to serve the whole of the western land parcel during the construction phase, so limiting the extent to which HGVs need to route along Flaxlands Lane to the west. From the Highways perspective, the trafficking by HGVs in the construction phase should be seeking to limit the length of Flaxlands Lane which needs to be used.
- Drawing No: ACM-XX-XX-DR-CE-00-0003/P04, which forms part of Appendix B to the Transport Assessment shows 'sketch' details of 6nr proposed passing bays along Flaxlands Lane. Although intended to be temporary, the applicant should be advised that full details of all these works will be required to be submitted as part of subsequent s278 Agreement

approval, and the 'base' used will need to be a full topographical survey as the OS land-line mapping is unlikely to be sufficiently accurate. It remains unclear to what extent the areas of widening shown will impact upon any existing drainage ditches running along the sides of the carriageway each side, and potential loss of hedgerow. It is further noted that reducing the length of Flaxlands Lane which needs to be trafficked by HGVs during construction will reduce the passing bay works required to the highway.

- Notwithstanding the creation of new passing places, I consider pre-construction and post-construction highway condition surveys will be required along the length of Flaxlands Lane affected by construction trafficking, and this included in subsequent Conditions.
- There needs to be proper breakdown of the numbers of HGV's and types expected over the entire construction period set out in the Transport Assessment, and how this has been used to derive the daily number of expected movements set out in paragraph 5.2.3. Supporting information is also required to indicate how the projected numbers of HGV movements/types associated with the various construction activities have been derived, so calculations are needed to 'prove' the numbers based on the expected materials quantum and the expected disposal of any spoil off-site.
- Additionally, full details of the new northern access and changes to the existing eastern field parcel access including construction make-up will need to be submitted for s278 technical approval. This will need to show the visibility splays and any hedge clearance needed to achieve them. As noted, I do not favour the existing farm access track to the west being used during the construction phase to limit the extent of HGV trafficking needed along Flaxlands Lane.

