



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Head of Planning & Development, Operations Directorate, SW Region,
National Highways
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To: Wiltshire Council (FAO Georgina Wright)
Via developmentmanagement@wiltshire.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: PL/2026/00795

Location: Land north of A303, and northwest of approved EV hub, Chicklade, SP3 5ST

Proposal: Installation of a solar farm with ancillary structures supporting the energy demand of the adjacent approved Chicklade (EV) service station

National Highways Ref: NH/26/15099

Referring to the consultation on a planning application referenced above, in the vicinity of the A303 that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningsw@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: *G Gallacher*

Date: 10 March 2026

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Position: Assistant Spatial Planner

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Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2026/00795.

Reasons

Background

The application is seeking permission for a solar farm located to the north-west of the EV Charging Hub initially consented under application PL/2022/06298 and recently subject to a s73 application reference PL/2025/10020 to vary the approved plans (still to be determined).

Access to the solar farm is proposed to be taken via the Charging Hub access junction from the A303, although at the screening/scoping stage access was proposed to be taken from an existing farm track located approximately 340 metres to the west.

National Highways primary interest is in the ongoing safe and efficient operation of the strategic road network, which in this case comprises the A303, and it is in this context that our comments are made.

EV Charging Hub Consented Development

It should be noted that the proposals appear to conflict with plans submitted in support of the EV Charging Hub application PL/2025/10020, and the consented permission PL/2022/06298, which show no onward connection to the solar farm and include significant earthworks around the north and west of the development. Clarification is therefore required with regards the conflicting plans submitted in support of the two currently live applications.

The EV Charging Hub permission PL/2022/06298 restricts by condition any onward vehicular connection from the Hub to adjacent land. Whilst this was primarily on safety grounds, National Highways policy is to restrict any onward connection from accesses which have been permitted to serve single developments. However, the applicant indicates that the solar farm will be ancillary to the EV Charging Hub and will only be in operation for the duration of the EV Charging Hub use. Therefore, should the access via the EV Charging Hub ultimately be considered otherwise acceptable, we

will expect the ancillary status of the development to the EV Charging Hub to be secured by planning condition.

Assessment of Traffic Impact and Access

It is acknowledged that the primary traffic impact arising from the development will be during the construction phase, with the site generating minimal maintenance trips once operational. An outline Construction and Operational Traffic Management Plan (TMP) has therefore been submitted, prepared by Evoke and dated January 2026. The plan identifies a total of 222 two-way HGV movements across an anticipated 2-month construction period with an additional 40 two-way LGV movements daily. Whilst the TMP considers average daily HGV movements to be low at 5 per day, it gives no indication of what peak construction period two-way movements could be. Total 16.5m articulated vehicle movements are predicted to be 64, although this may be an under-estimate if applying the criteria within Table 2 which would suggest these movements are likely to total around 71.

Having reviewed the submitted plans, we consider that there are a number of areas that remain to be satisfactorily understood with regards to management of the construction phase and the proposed site access arrangements. We have therefore identified the following issues that will need to be addressed by the applicant.

1. The only traffic movements considered within the TMP are those associated with the solar farm. No information is provided as to how these works will be phased and integrated with the construction traffic management plan for the EV Charging Hub currently under construction. This raises significant concerns as to how both sets of construction traffic are to be managed, where all construction traffic is to be parked (both staff parking and construction vehicles) and how the solar farm is to be phased with the build programme of the EV Charging Hub. If the EV Charging Hub infrastructure is constructed prior to the construction of the solar farm, this is likely to have an adverse impact as the proposed layout of the services is not suitable to cater for the turning movements of vehicles larger than a car or van, and it is unclear how the solar farm construction vehicles are to be accommodated within the services layout. The proposed plans do not indicate where the temporary construction compound referred to in the TMP will be located or whether it will be reliant on the EV Charging Hub site to provide this.
2. The TMP states that the visibility available at the existing agricultural access track does not meet the Design Manual for Roads and Bridges (DMRB) stopping sight distance (SSD) requirements but this is not supported by evidence that this is actually the case. Horizontal and vertical visibility splay layouts should be provided to show what the currently available SSDs at the existing access track are, to enable National Highways to come to an informed decision. It should also be noted that temporary speed limits may need to be implemented on the A303 to allow the construction of the new access into the EV Charging Hub, which would also reduce the SSD requirements for the existing agricultural access track junction with the A303.
3. The swept path drawings provided for a 16.5m design vehicle only show a single track entering the site from the A303 and no tracking has been provided to show how two design vehicles can pass one another if they arrive/exit the

site at the same time as referenced in paragraph 4.2.6 of the report. Swept path plans should be provided that show both tracks together side by side on the access plan to evidence this is achievable. Whilst the TMP considers that there will only be 64 articulated vehicle movements and that therefore conflicting movements will be infrequent, this does not consider the further 158 HGV movements that are also forecast to occur, and as noted above it remains to be understood how trips associated with the EV Charging Hub have been factored into the consideration of the solar farm construction traffic impacts.

4. It is unclear whether suitable visibility is available from the passing point provided on the access track to allow vehicles exiting the site to be able to see vehicles entering from the A303 due to the cutting in the EV Charging Hub earthworks that the access road will have to pass through. Vertical profiles showing the visibility splays in both horizontal and vertical planes from the passing bay looking toward the A303 should be provided to demonstrate that suitable visibility is available to allow the access track to operate in a safe manner.
5. A vertical profile along the track should also be provided to demonstrate that the requirements of CD123 of the DMRB can also be met due to the difference in level between the services access (circa 145m AOD) and the proposed solar farm entry (circa 160m AOD).
6. Given the difference in levels, it will also need to be understood how surface water drainage from the access track will be dealt with to ensure no surface water flows from the development onto the EV Charging Hub access road and the A303. DfT Circular 01/2022 paragraph 59 states that *“To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment”*. A preliminary drainage design will therefore need to be provided for our review.
7. With regards to the temporary construction signing proposed, it should be noted that any signing within the A303 boundary must be in accordance with Chapter 8 of the Traffic Signs Manual and be undertaken by suitably qualified sector approved contractors to be approved by the National Highways Network Occupancy Team prior to any signs being placed on the network. Any traffic management applied for will also need to be timed to avoid any conflicting works on the network and any restrictions or embargoes that may apply at any given time. All costs for traffic management must be met by the applicant.

We would also wish to make clear that the A303 is under the control of National Highways as the strategic highway authority, and any engagement and liaison identified within the TMP will need to be undertaken with National Highways as the relevant Overseeing Organisation. All works with the potential to impact on the A303 will need to comply with the standards contained within the DMRB and reflect the requirements of DfT Circular 01/2022.

Glint and Glare Assessment/Screening Requirements

A Glint and Glare Assessment has been submitted, prepared by Pager Power and dated 14 January 2026. National Highways will not accept any glint or glare impacts on highways safety grounds and all necessary screening mitigation will need to be provided by the developer, wholly within the development site. The developer cannot rely on National Highways estate to provide any screening mitigation for their development, in accordance with DfT Circular 01/2022 which states at para 57 that *“For reasons of safety, liability and maintenance, any physical infrastructure that is necessary to mitigate the environmental effects of or on development must be located outside of the highway boundary of the SRN.”*

The Study identifies two sections of the A303 where solar reflections are geometrically possible within a road users primary field of vision. With regards to receptors 1-5, the Study considers that existing vegetation would obstruct views such that there should be no impact on road users in practice. With regards receptors 13-24, any screening that may be provided by existing vegetation will be supplemented by proposed vegetation along the east and south-east boundary of the site, such that views are unlikely to occur in practice. However, the applicant cannot place reliance for screening mitigation on vegetation which is located on land outside of their control as there is the risk that the vegetation may not remain in place or be maintained to provide a screening function for the development. We therefore expect the applicant to provide sufficient screening within the development site, or by a site boundary feature, to mitigate the identified impact on the A303

We note that a Landscape Framework Plan has been provided which proposes hedge planting along all boundaries of the site, with additional orchard planting to the south-west. Whilst this is generally acceptable, the applicant should show how temporary screening will be provided whilst new planting becomes established. We would also offer the applicant advice with regards to the inclusion of *prunus spinosa* (Blackthorn) in the planting mix. Due to the invasive nature of the species, it is not accepted for planting in proximity to the highway boundary (within 10 metres). Although the proposed planting locations are set back from our network, the applicant may nonetheless wish to consider the inclusion of an alternative species, particularly an evergreen species to provide year-round cover.

Summary

National Highways considers that further information is required from the applicant to enable us to fully understand the impact of the development on the safe and efficient operation of the A303 trunk road and to demonstrate that the proposals comply with the requirements of DfT Circular 01/2022 and the DMRB. This further information relates to the proposed site access arrangements and construction traffic management, and necessary landscape screening.

Recommendation

National Highways recommends that Wiltshire Council does not grant consent for application PL/2026/00795 for a period of up to 6 months from the date of this recommendation. This is to allow time for the applicant to submit further information

to demonstrate that the development can comply with the requirements of DfT Circular 01/2022 and the Design Manual for Roads and Bridges.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.