



Consultation Report Appendices

**Appendix G-5: Statutory Consultation under Section 42 of
the Planning Act 2008**

September 2025

Planning Inspectorate Reference: EN010168

Document Reference: APP/5.2

**APFP Regulation 5(2)(q); Planning Act 2008; and Infrastructure
Planning (Applications: Prescribed Forms and Procedure) Regulations**

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1 Section 42 and 43 Applicant Response Table

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Acton Turville Parish Council	Transport and access	Whilst the village of Acton Turville will not be directly impacted by the Lime Down Solar Farm once operational, we will be directly impacted during the construction phase. It is on these grounds that we wish to object to the project. Acton Turville lies on the direct route between the M4 motorway and the proposed sites of the Lime Down solar farm. We are a small village with a network of narrow roads that pass directly through the village. These roads are simply not designed for the type and volume of commercial vehicles of the type that we understand will be involved in the solar farm's construction, potentially over an extended period of time. The impact on the village and its residents includes: • Damage to infrastructure including roads and buildings from construction traffic, • Risk of harm to individuals from large	No	It is acknowledged that the B4039, which travels through Acton Turville, forms part of the construction vehicle route for Lime Down A, B and C. The Department for Transport (DfT) defines B-roads as "<i>roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network</i>" which typically carry a reasonable volume of traffic, including HGVs. Baseline surveys have been undertaken, as set out in set out in out within Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], which indicate that this is the case for the B4039. An assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] Construction vehicle routes will be controlled through the Construction Traffic Management Plan (CTMP) which will be

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		vehicles negotiating narrow streets, in particular in areas where there are narrow footpaths (or, in some cases, no footpaths at all). • The environmental impacts, including noise, dust and emissions from the large numbers of construction vehicles passing through our village. We have yet to see evidence to demonstrate that these impacts and risks have been fully assessed and understood, nor to describe what measures are to be implemented to reduce them, but in our opinion the impact on the village and its residents will be intolerable. We therefore object most strongly to the proposed Lime Farm development.		prepared in substantial accord with the CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The CTMP would include measures such as: - A commitment to a road condition survey to ensure any damage to the public highway caused by vehicles related to the construction of the scheme is rectified to the Local Highway Authority's satisfaction; and - Noise and dust suppression methods, such as switching engines off when stationary, sheeted equipment and water spraying. The construction routes to site are all on public highways that are unrestricted and built to adoptable standards. As such, HGV's and large agricultural vehicles already use these routes. If surrounding buildings were likely to be damaged by

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				large vehicles travelling along the public highway, then restrictions would already be in place. There is no evidence to suggest that construction vehicles will impact roadside buildings. Assessment of the effects of construction vehicles on the local highway network are set out in set out within ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3].
Atworth Parish Council	Landscape and visual / Cultural heritage / Ecology and biodiversity / Project description and DCO process	Atworth Parish Council attended the presentation made at Shaw School on 26th February. The council understand the government's desire to increase production of clean energy, and have approved the plans for one large renewable development in the village. We do though believe that proper consideration of planning principles should	No	The purpose of the Environmental Impact Assessment (EIA) process is to make sure that where we identify any significant effects, we put in place measures to reduce any negative impacts as far as reasonably practicable, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the Environmental Statement (ES) [EN010168/APP/5.1] are thorough and have properly considered all impacts. The Applicant notes that detailed assessments

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		apply to help us to ensure that developments are of the right size in the right place. We have the following further concerns; - Despite the changes made to the Lime Down plans, it is difficult to see how an industrial development over 4 metres in height including batteries and infrastructure spread over 2,170 acres of a predominantly agricultural rural setting will not fundamentally change the character of that landscape. - The plans claim to minimize the impact on heritage assets but given the proximity to so many, it is also difficult to see how that can be achieved, and any impact is not acceptable. - Disturbing the hedgerows, wildlife and habitats over an area that size will have a lasting impact on ecology.		are available for the topic areas mentioned in the comment at the following locations: ES Chapter 8: Landscape and visual [EN010168/APP/6.1]; ES Chapter 12: Cultural Heritage [EN010168/APP/6.1]; ES Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]; ES Chapter 13: Transport and Access [EN010168/APP/6.1]; ES Chapter 14: Noise and Vibration [EN010168/APP/6.1]; ES Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1]; and Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. The Applicant appreciates that these chapters contain a high level of detail. A non-technical summary of the conclusions of these assessments can be found in ES Volume 6.4, Non-Technical Summary [EN010168/APP/6.4].

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		- There remains no detailed assessment of the impacts of noise and risks associated with fire from over 400 acres of BESS and infrastructure. It is vital that mitigation of fire risks are fully considered at an early stage. - Access routes are unsuitable for a development of this type. - Impact on our parishioners on the grid connection is impossible to properly assess from the plans submitted as they lack detail. - Please acknowledge receipt of these comments.		
Bath and North East Somerset Council	Transport and access	Bath and North East Somerset Council (BaNES) have reviewed the proposal at Lime Down Solar Park and offer the following comments. The website (www.limedownsolar.co.uk) contains information regarding the development which has been reviewed, in particular the Construction, Operation and Decommissioning page.	No	The construction vehicle routes for the Scheme are set out within Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2].

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		It is noted that or Lime Down Sites A, B, and C, are proposed with the primary access points are between Ladyswood and Sherston, adjacent to the SHER37 Byway, and along Fosse Way. For Lime Down Sites D and E, the primary access points are located on Bradfield Cottages Road and along the A429. The key roads will include the M4, A46, B4040, B4039, A429, Alderton Road, and Fosse Way. Whilst the M4 is listed, access will mainly reside to the north which would direct traffic away from the Bath and North East Somerset area. Given the scale of the proposal, there appears to be some potential for significant transport impacts, however, BaNES highway authority is content that there would be no significant impact on the authority's highway network throughout the construction, operational and decommissioning phase of the development.		The Applicant can confirm that no roads within the jurisdiction of Bath and North-East Somerset Council form part of the construction vehicle routes and would therefore be impacted by the Scheme. Construction vehicle routes will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO).

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		BaNES have no further comment on the proposals.		
Bristol Water (South West Water)	Project description and DCO process	Please find attached representations submitted on behalf of Bristol Water in its capacity as Statutory Water Undertaker for part of the proposed development boundary. The Undertaker accompany its representations with the attached plans, which it hopes will assist the developer is identifying the Undertaker's operational boundary in relation to its development and recorded assets within its boundary to inform ongoing design constraints. The Undertaker invite the developer to make contact at its earliest convenience to begin discussion and drafting of suitable Protective Provisions that must be included within its Draft DCO.	No	Comment noted. The Applicant has engaged with Bristol Water to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1] .
Bristol Water (South West Water)	Project description and DCO process / IGP	RE: South West Water (Trading as Bristol Water) Response to Stage 2 Consultation of Lime Down Solar Park DCO Thank you for the invitation to submit comments on the Stage 2 Consultation for	No	Comment noted. The Applicant has engaged with Bristol Water to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the

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		the Lime Down Solar Park DCO. South West Water Limited [SWWL] (trading as Bristol Water) provide the following response in its function as Statutory Water Undertaker [the Undertaker] for part of the area relevant to the proposed development. As stated within SWWLs response to the previous Land Interest Questionnaires, the Undertaker has existing in-situ statutory assets located within the area identified within the proposed redline area. The applicant has a legal obligation not to interfere with the Undertaker's statutory assets. Reiterating the Undertaker's previous response, SWWL request that: (1) suitable consideration is given within the design to accommodate a minimum 5 metre easement strip on both sides¹ of all in-situ pipes to restrict development that could impact/damage the asset; (2) do not raise or lower the ground level around/over any of the Undertaker's in situ assets without the Undertaker's explicit written consent; and (3) include protective provisions within		Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1].

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		the draft Development Consent Order relating to the Undertaker's statutory assets. The Undertaker strongly invites the applicant to make contact with SWWL at their earliest convenience to discuss and jointly draft the protective provisions, required for the Statutory Undertaker's assets, to include within the schedules of the draft DCO, prior to its submission to the Planning Inspectorate. In the event the applicant intends to request a diversion – at the applicant's cost – of any in-situ pipework the Undertaker may have within the applicant's development area, please contact the Undertaker at your earliest convenience to discuss.		
Bristol Water (South West Water)	Project description and DCO process / IGP	Further general guidance in relation to works in proximity to the Undertaker's assets can be found below; however, for specific guidance relating to the indicated asset, the applicant is advised to contact the Undertaker.	No	Comment noted. The Applicant has engaged with Bristol Water to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the

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		• Any crossing of our apparatus without a clear 500mm minimum vertical clearance above/below the main. • Any new infrastructure built within 500mm of any Bristol Water Asset unless agreed by asset owner. • Any utility crossings not straight, crossing must be made at a right angle to the existing mains. • Any utilities running with our mains within the easements overhead or underground. • Any buildings erected within the easements, easement width to be determined by size of asset/apparatus. • Any increase or decrease of existing ground level by +/-200mm. • Any spoil/materials stored within the easements. • Any cabins/storage containers/offices within the easement. • Any excavation over the known location of any of our apparatus without a watching brief and two weeks' notice usually needs to be given to arrange the watching brief. - Any mechanical excavation within 500mm		Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1].

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		of our apparatus. • Any excavation work being carried out without RAMS being submitted. • Any more than two lengths and 1 joint exposed at any one time, unless supported (inclusive of if using vac ex) • No greater length of 2000mm of main to be undermined if tunnelling underneath and no collar left unsupported. • The crossing of plant over our mains without protection at ground level to prevent unnecessary surcharge being applied to our apparatus, this protection can be bog mats, aluminium roadway or ground guards and would need to be agreed with us in advance. All crossings must be at 90 degrees if possible. • The planting of trees within the easement. Anything planted near the easement must have root restriction to prevent the roots spreading into the easement. • Any fencing within the easement other than posts erected using bolt down post shoes and reinforced concrete to anchor the post shoes.		

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		• Any reinforced concrete being laid within the easements. • Any mechanical excavator must use toothless buckets when excavating within proximity of know Bristol Water asset as per HSG 47 is 500mm. • That no street furniture (i.e., poles, bollards, or similar apparatus) is positioned over or within one metre of our assets. • The installation of the new kerb race for which we require 500mm clearance • Adequate trench support/ ground stepped must be used to ensure there is no risk to Bristol Water's assets from trench collapse if ground is left open overnight. • For any work within the easements of Bristol Water apparatus/ assets (above and including 200mm mains) a Bristol Water watching brief must be in attendance. First ½ day is free of charge and thereafter the charge is £43.00 per hour (plus VAT) • Mains tracing and pegging out of easements is also available on request. First ½ day is free of charge and thereafter the charge is £43.00 per hour (plus VAT).		

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Bristol Water (South West Water)	Project description and DCO process / IGP	The Undertaker attach the following ordnance survey drawings upon which are marked the sizes and approximate positions of the Undertaker's mains and service pipes which are normally laid with 750mm of cover in footpaths/verges and 900mm of cover in roads: - Lime Down Solar DCO plus Development Area (dated: 14/02/2025); and - Lime Down Solar DCO vs Bristol Water Boundary. The Undertaker strongly recommend that should the applicant or its agents intend to excavate near the Undertaker's assets that the applicant contact Bristol Water to ascertain the exact location of its mains to prevent any damage and allow the applicant to decide if you proposals can accommodate the Undertaker's assets or if a diversion will be required.	No	Comment noted. The Applicant has engaged with Bristol Water to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1] .
Bristol Water (South West Water)	Project description	The Undertaker strongly recommend that should the applicant or its agents intend to excavate near the Undertaker's assets that	No	Comment noted. The Applicant has engaged with Bristol Water to inform them of the proximity of the Scheme to the

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	and DCO process / IGP	the applicant contact Bristol Water to ascertain the exact location of its mains to prevent any damage and allow the applicant to decide if you proposals can accommodate the Undertaker's assets or if a diversion will be required. SWWL do not normally keep records of service pipes, however, a number of such pipes may be indicated upon our ordnance sheet, but no guarantee as to the accuracy of this information can be given. Should you require any further information concerning the section of service pipe belonging to the Undertaker, we suggest that you contact our Customer Services Helpline to arrange a site meeting. The section of service pipe belonging to the company normally runs from our water main to the boundary of the property or the highway boundary - whichever is appropriate. Please ensure that no street furniture (i.e. poles, bollards or similar apparatus) is positioned over or within one and a half metres of our mains or service pipes.		pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1].

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		Any works in the vicinity of our trunk mains (mains with greater diameter than 250mm or 10 inch), as indicated on the enclosed plan, should be referred to our Strategic Operations Team, via our Customer Services Helpline, on telephone number 0345 702 3797.		
Bristol Water (South West Water)	Project description and DCO process / IGP	Please note that no trees or large shrubs are to be planted over or within 3.0 metres of our apparatus unless suitable root restriction measures are taken. If root restriction is to be considered it should extend at least 1.5 metres below finished surface level, in which case the minimum clearance between the wall of our pipeline/apparatus and the root restrictor can be reduced to 0.5 metre. However, should our pipeline have to pass between two trees/large shrubs, even with root restrictors, a minimum clearance of at least 3.0 metres must be maintained between their respective boles to facilitate vehicular access.	No	Comment noted. The Applicant has engaged with Bristol Water to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1] .

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		Please note that the Undertaker does not deal with enquiries concerning drainage/sewerage in this area and we advise you to contact Wessex Water direct. Their address is: Wessex Water Developers Group, Operations Centre, Claverton Down Road, Claverton Down, Bath, BA2 7WW, or www.wessexwater.co.uk/developers .		
Brokenborough Parish Council	Transport and access	Construction Disruptions The construction phase, expected to last up to two years, is expected to involve over 20,000 articulated lorries, HGVs, and vans transporting materials to the site, in addition to traffic from site workers. This would result in increased noise, pollution, and pose dangers to pedestrians, cyclists, horse riders and other road users. Furthermore, a 25+ mile trench stretching from Sherston to Melksham would cause significant disruption to the area. The verges alongside the narrow lanes would be damaged by the additional traffic, with no mechanism to ensure these were fully	No	Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This will be a requirement of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the DCO. Traffic noise during both construction and operation is assessed in Section 14.10 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and no significant

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		'made good' once the project was completed.		effects are predicted, with impacts expected to be negligible or low. Controls on construction traffic are secured through the Outline CTMP [EN010168/APP/7.22]. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise

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Canal & River Trust	Project description and DCO process	Lime Down Solar Park Waterway: Kennet & Avon Canal Thank you for your consultation. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process. The Trust has reviewed your proposals and on the basis that they appear unlikely to have any impact on our waterway we have no comment to make at	No	Comment noted. The Applicant agrees that there is unlikely to be any impact on the Trust's assets.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		this time. If your proposals become significantly altered, we ask that you re-consult us in order that we can re-consider this position. Please do not hesitate to contact me with any queries you may have. Yours sincerely,		
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Transport and access	As it stands, the construction traffic routes are all suggested as being indicative with survey work of those roads not yet being complete. Similarly, although reference is made to the intended preparation of an Outline Construction Traffic Management Plan, it is not yet available for the Council to consider. The absence of certainty and key information in this regard is of concern to the Council given the relatively long construction phase and degree of disturbance and inconvenience to affected communities.	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO).

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				The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised.
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Soils and agriculture	It is evident from the survey work so far undertaken that the development will not avoid elements of Best and Most Versatile (BMV) agricultural land. Accepting that national policy does not preclude its use, it will remain possible for Lime Down to reduce the amount of BMV being used and to seek previously developed and non-agricultural land, as is advised in Planning Practice Guidance. Bearing in mind Wiltshire has a significant food producing economy should BMV agricultural land continue to be incorporated within the development site then this should weigh heavily against the proposals. At this time, it is difficult to judge what weight should be given to benefits such as improvements to soil health, biodiversity and carbon sequestration.	No	The Applicant makes note of this comment. Land of BMV quality is included in the proposals. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of Environmental Statement (ES) Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. ES Volume 1, Chapter 4: Alternatives

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				and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites.
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Project description and DCO process	Looking at the Wiltshire Local Plan it is accepted that the proposed development broadly accords with Policy CP42 of the Wiltshire Core Strategy provided the adverse impacts are adequately mitigated. Similarly, it is broadly aligned with Wiltshire's Green and Blue Infrastructure and climate strategies. A requirement of the National Planning Policy Framework (NPPF) is for the planning system to support the transition to a low carbon future providing it aligns with other national	No	The Applicant makes note of this comment. A full suite of surveys and updated assessments are available within the technical chapters provided within the Environmental Statement (ES) [EN010168/APP/6.1] .

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		policies and so an overall view will need to be taken by the Secretary of State. However, notwithstanding this policy context, the Council considers that, as it stands, several surveys to comprise the Environmental Impact Statement (EIA) to inform the final form of the development have yet to be completed. Consequently, the proposals are far from being articulated and therefore the Council cannot yet be assured that the impacts will be fully captured within the DCO submission. In fact, whilst there is potential planning policy support for the development of this nature, as it stands, it is not possible for the Council to reach a fully considered view as a whole.		
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council	Project description and DCO process	The Council is grateful for the ability to make comment again on the emerging proposals and asks that their views be taken into account, by Lime Down Solar, as the scheme progresses. However, the Council is aware of the significant support given to renewable energy projects by local and national planning policy, but as it	No	The Applicant makes note of this comment. A full suite of surveys and updated assessments are available within the technical chapters provided within the Environmental Statement (ES) [EN010168/APP/6.1].

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/ Seagry Parish Council		stands, there remains significant omissions in the survey work and consequent gaps in the specifics of the proposals and further information is required before the Council can fully understand the likely impacts and to reach an objective, balanced planning judgement on the merits of the proposed scheme.		
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Landscape and visual	In regard to landscape impacts, the Council is concerned about the visual impact created by such a vast sprawl of solar panels across a substantial geographical area. As it stands there is a lack of detail and clarity on how zones of influence for the cumulative impact assessment have been devised and on the assessment's methodology, resulting in the scope for the assessment being considered insufficient for cumulative assessment of landscape and visual effects.	No	The Cumulative Methodology is explained in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1] and is set out in Volume 3: Appendix 8-1: LVIA Methodology [EN010168/APP/6.3] . A Technical Note has also been issued to Wiltshire County Council.
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council	Hydrology, flood risk and drainage	Whilst the submission suggests that the majority of the solar sites and cable connection route are located within Flood Zone 1, there remains some risk of flooding primarily from fluvial sources. It is evident	No	The Applicant acknowledges these concerns and confirms that detailed assessments are being provided within the updated Flood Risk Assessment and Drainage Strategy, included in

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/ Langley Burrell Without Parish Council / Seagry Parish Council		that a significant amount of additional flood modelling and survey work is yet to be undertaken, including with regard to the management of surface water, accommodation of fire suppression flows, compliance with Wiltshire Council's betterment policy and not increasing flood risk from changes affecting overland flow routes. Until such assessments are available, the Council remains extremely concerned about the development's potential impact on drainage and flooding.		Environmental Statement (ES) Volume 3, Appendix 11-1 to 11-9 [EN010168/APP/6.3]. These assessments are based on the latest site layout, topographical data and site-specific modelling. The vast majority of the panelled areas are located within Flood Zone 1 and are not at risk of fluvial flooding. Embedded mitigation, including avoidance of watercourses and flood extents, has been incorporated into the layout. Where localised fluvial risk exists, for example near the Gauze Brook, site-specific modelling is being undertaken to confirm extents and inform platform levels and drainage designs. This includes Appendix 11-6: FRA and Drainage – Lime Down D [EN010168/APP/6.3], which documents the site-specific modelling approach already completed. For the BESS and substation sites, sealed drainage systems are proposed that

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				incorporate lined gravel subbases and self-actuating valves. These systems are being assessed to ensure they can accommodate both stormwater and the reasonable worst-case volume of fire suppression or cooling water. Preliminary results indicate that additional attenuation tanks may not be required. The updated design also considers Wiltshire Council's betterment policy, and runoff rates for the relevant storm events will be restricted accordingly. As the scheme progresses, a full assessment of overland flow paths will be included to ensure that flood risk is not increased on or off site.
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council	Ecology and biodiversity	As it stands, the Council contends that there is insufficient information available to assess arboricultural impacts relating to the scheme, especially as the cable connection route is not sufficiently defined.	No	The Applicant makes note of this comment. A detailed assessment of the arboricultural impacts as a result of the Scheme has been completed and submitted as an appendix to the Environmental Statement (ES) [EN010168/APP/6.1], titled Arboricultural Impact Assessment and Outline

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
/ Seagry Parish Council				Arboricultural Method Statement [EN010168/APP/6.2]. A full BS5837:2012 tree survey has been completed on all accessible sections of the cable route corridor; arboricultural constraints have fed into the cable route design. Any unavoidable impacts and suitable mitigation measures are included in the above ES documentation.
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Ecology and biodiversity	Turning specifically to Biodiversity and Net Gain. Evidently studies have been carried out. But these are largely desk studies, though not exclusively and concentrate chiefly on protected species and larger animals, including birds. There has not been an invertebrate (insect) study, nor a plant study. There is no biological soil study, although there is a detailed tree study. On the question of plants, the ecologist has said that most of the arable land in the project area had, due to its present use, a very low plant diversity. However, there is no study of how the agricultural land is actually used, e.g. %	No	The Applicant notes these comments. Survey findings are set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] supported by baseline information presented in ES Volume 2, Appendices 9-1: Ecological Baseline Report to 9-7: Wintering Bird Survey Report [EN010168/APP/6.3]. A detailed Biodiversity Net Gain Assessment Report [EN010168/APP/7.8], including habitat condition assessments, species lists and completed Statutory Biodiversity Metric [EN010168/APP/7.9]

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		arable or pasture, % organic or chemical cultivation. It is suggested that 47% of the land in the project area will be dedicated to biodiversity, and 53% to solar panel electricity production. Some of the 47% figure is new land acquired and put aside for this purpose, and some in the figure is the land between the solar panels themselves. On the question of biodiversity net gain, it is being suggested that present agricultural use was leading to limited biodiversity, so removing from agriculture would inevitably lift biodiversity. Whilst true it does depend on the present and future farming methods, but data on that is not at present in the EIA. Regarding how 'net gain' is actually determined, it is suggested that Defra and the biodiversity agencies have a methodology, using a computer spreadsheet, where large amounts of data		is provided in Volume 7 of the Development Consent Order (DCO) submission. This is accompanied by an Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] which sets out how the habitats will be secured and maintained/managed for the lifespan of the project along with a comprehensive ecological monitoring schedule.

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		are fed in and then, using some technique, a calculation is made. At present there is no document in the EIA on how biodiversity 'net gain' is determined or what it is expected to be.		
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Decommissioning and construction	Finally, there are concerns regarding the lifetime of the project and its decommissioning. The Council has experience of developers running away from responsibilities or potentially going bankrupt. There needs to be assurance that all legal and financial aspects are covered, possibly with a Bond held by a third party?	No	A Development Consent Order (DCO) includes a requirement to decommission the project and return land (including agricultural land) to its original use. Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Further details on how the Scheme will be decommissioned are available in DCO Volume 7: Outline Decommissioning Strategy [EN010168/APP/7.13] .
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell	Cumulative Effects	Dear Sir/Madam Island Green Power - Lime Down Solar Park – Statutory Consultation The Council responded to the Planning	No	The cumulative impact of the Scheme along with other proposed developments (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects

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Without Parish Council / Seagry Parish Council		Inspectorate in regards to the Scoping Opinion requirement under reference EN010168 on the 8 August 2024 and now the proposals have advanced further is pleased to be able to comment on the future Development Consent Order for the Lime Down Solar Park application. This is a huge project covering a combined area of some 2,835 Hectares within Northern Wiltshire with a national grid connection at Melksham Substation and consequently will have a significant negative impact on the rural scene/landscape, surrounding village settings, ecology and biodiversity, hydrology, flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport and access, socio-economics, tourism and recreation, etc that has to be balanced against the potential gains of renewable energy generation and carbon reduction. Whilst not opposed to the principle of the		[EN010168/APP/6.1]. A full environmental impact assessment has been prepared. Details can be found in the ES [EN010168/APP/6.1]. The Applicant recognises that is the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation.

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		development of solar farms the Council is concerned at the concentration of solar farms, battery storage and associated infrastructure within the County of Wiltshire. It is a fact that some villages are now, or will be following continuing smaller scale planning decisions, completely surrounded by solar farms and this represents a significant cumulative impact and industrialisation of the countryside.		
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Cumulative Effects	There is particular concern over the concentration of solar farms and associated infrastructure and the adverse cumulative impact and industrialisation of the countryside and the Council is unclear whether the EIA and DCO will adequately assess alternative locations for this development and cumulative impacts associated with a significant number of solar related development in North Wiltshire and the County as a whole for all the rural industry mentioned above, including the adverse effect on the landscape settings potentially damaging tourism within the	No	The cumulative impact of the Scheme along with other proposed developments (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. Information on how the Applicant has considered alternatives (including the site selection process) can be found in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. A full environmental impact assessment

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		County. There does not appear to be an assessment of these factors.		has been prepared including an assessment on landscape setting. Details can be found in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Consultation and engagement	Council Members took the opportunity of attending one of your public consultation events to be briefed on the proposals and had the opportunity of raising questions and consider that the proposals still remain in an embryonic stage and as such there is still a need for much further information, such as the cable connection route, that requires scrutiny for the full cumulative effects of the whole development to be fully considered.	No	The Applicant makes note of this comment.
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	Community benefits and impact	It appears to the Council that there is a lack of information on potential financial benefits from this huge project to the local communities involved. Should not this be addressed at this stage so that there is a clear knowledge of what the intentions are and how a community benefit fund is to be arranged and implemented?	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside,

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				providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
Christian Malford Parish Council	Landscape and Visual / Soils and Agriculture	Christian Malford Parish Council view this proposal as speculative proposal rather than a sustainable development to provide renewable energy. We have significant concerns in the following areas: Impact on landscape, Wiltshire County Council (WCC) prepared a landscape sensitivity analysis in March 2023. In the areas highlighted for development	No	The applicant notes this comment. Reference to the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment is included in the Environmental Statement (ES), specifically within the Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The study assesses the sensitivity of the

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		(Sherston, Hullavington et al), the report identified significant landscape impacts for solar farms of up to 120ha in size, Lime Down is c850ha, therefore there will be more than a significant impact on the landscape. A lot of parishioners visit the Cotswold to walk and cycle the Fosse Way, Wessex and other footpaths and bridleways. These will either be destroyed or be routed through an industrial landscape, reducing those who want to visit and having a major impact on the tourism income of the area. As a rural community with many farms, we are concerned about loosing farmland and the associated food production. The proposed site is comprised of 30% best quality farmland (255ha). Given our reliance on imported food, the loss of this land presents irreversible damage to the sustainability of food production in the UK.		Wiltshire Landscape Character Areas/ Types to different types and scales of Renewable Energy rather than impacts. Due to the dispersed nature of the Sites A-E which make up the Scheme there is limited intervisibility between the Sites. The LVIA includes an assessment on all footpaths and bridleways and the Cumulative Visual Assessment assess sequential views from publicised routes such as the Fosse Way. A detailed assessment of the likely significance of effects from the Scheme on individual PRoW, long-distance recreation routes (such as the Fosse Way), tourism destinations, recreational features, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual

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				recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. An assessment of up to 20 FTE likely agricultural job losses as a direct result of the Scheme and as a result of supplier and downstream industry losses, has been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supported by specific assessment of agricultural circumstances in ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Food security will not be compromised by the Scheme (or solar energy more widely) - in 2024, solar used 7,100ha of agricultural land, half of which was also used for some form of agricultural production. In the same year, 581,000ha of arable land was uncropped.

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Corsham Town Council	Project description and DCO process	Dear Sir or Madam Corsham Town Council considered the Lime Down Consultation at its Planning Meeting on 12 March. It was Resolved: That whilst the Town Council is broadly supportive of climate resilience measures, there are many concerns in relation to this proposal. The Town Council does NOT support the idea of having to install cables to service a solar park which is 20 kilometres away when there is a substation much closer to the site of the panels. The substation at Minety should be upgraded to prevent the need for extensive cabling. Access points for this solar park should be fit for purpose and appropriately placed. The current proposal raised concerns for the Town Council: that the proposal would be contrary to Policy CNP E3 of the Corsham Neighbourhood Plan impacts on both residents and tourists;		The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. High voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. A range of connection options were explored for the Scheme and the Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. The Applicant has undertaken extensive engagement with National Grid throughout the scoping and development of the Scheme to determine the appropriate point of connection. The Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. Whilst

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		PLA-1 impacts on agricultural land which may last for some time; disruption to country roads which are heavily used, during the construction period; the proposed width of the construction corridor; fire and site safety concerns; possible disturbance of a Roman road; the uncertainty of the route potential long-term effects of the electromagnetic field on land and livestock; emergency access during the construction phase. The Town Council would like to know more about potential community benefits such as electric community buses.		Minety substation does house 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety for the Scheme. On that basis, Minety Substation is not a viable alternative and the Existing National Grid Melksham Substation remains the only viable connection point for the Scheme More details on how the Cable Route Corridor has been located and designed can be found in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests.

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				The assessments set out in the various chapters of the ES [EN010168/APP/6.1] detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The Applicant understands the Scheme to comply with the Corsham Neighbourhood Plan Policy CNP E3 as the relevant section of the Scheme is the Cable Route Corridor, which is anticipated to have temporary visual effects only during construction, and includes embedded measures to protect existing PROWs during construction and throughout the Scheme's operational lifetime. This is secured through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline PROW Management Plan (PROWMP) [EN010168/APP/7.17], both of which are secured by requirement in the Draft

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				Development Consent Order (DCO) [EN010168/APP/3.1]. The compliance of the Scheme with the Corsham Neighbourhood Plan, including Policy CNP-E3 is set out in Annex B Local Policy Accordance Tables of the Planning Statement [EN010168/APP/7.2]. The Applicant welcomes the communities' recommendations for what community benefits are considered of greatest benefit and use. The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Scheme cannot meet but that the Applicant wants to be able to contribute towards. ES Chapter 17: Soils and Agriculture [EN010168/APP/6.1] focus on the likely significant effects on Soils and Agriculture as a result of the Scheme and identifies and

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				proposes measures to address the potential impacts and likely significant effects during the construction, operation and maintenance, and decommissioning phases of the Scheme. Safety risks from substations and BESS have been assessed within ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7 Major Accidents and Disasters [EN010168/APP/6.1]. The chapter assesses the risk from 'Building Failure, Fire and Explosions' as not significant. This is due to embedded mitigation such as built in safety features in the BESS Area (i.e., cooling systems, non-combustible BESS enclosures, high levels of thermal insulation to protect against fire propagation, fire and gas detection system, explosion protection systems, suppression systems, emergency stop functions and isolation monitoring) and the implementation of the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. The Outline BSMP

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				has been developed using the guidance provided by Dorset and Wiltshire Fire and Rescue Service, which fully incorporates the recommendations of the National Fire Chiefs Council (NFCC) and NFPA 855, Standard for the Installation of Stationary Energy Storage Systems. Toxic gases from any fires are also assessed within ES Volume 1, Chapter 15: Air Quality and ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7 Major Accidents and Disasters [EN010168/APP/6.1]. An assessment of how these fumes could impact all sensitive receptors within a 1km radius of the BESS area which includes residential properties and species is provided in ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1] which concludes that no significant off site impacts are predicted should a fire event occur. Should a fire event occur then the recommendations set out in the Outline BSMP [EN010168/APP/7.21] (i.e., staying inside

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				and shutting windows) will further reduce impact to residents. The Applicant notes this comment. The effects of EMF from the Scheme are assessed in ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] Section 20.6. The assessment concludes that no significant impacts are likely as a result of any of the Schemes infrastructure and that any levels of EMF radiation are below the International Commission on Non-Ionizing Radiation Protection reference levels.
Cotswolds National Landscape	Landscape and visual / Transport and access / Glint and glare	Annex 1 below provides the Board's assessment of the Applicant's PEIR in respect of landscape and visual impact, transport impacts upon tranquillity and glint and glare impacts. We make several recommendations for amendments or additions to the Applicant's masterplans and Environmental Statement ('ES') in advance of the submission of a DCO application in order that the potential effects	Yes	The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate in order to reduce development impacts and control any negative effects on the environment. Parcels within the setting of the CNL, on the boundary of the CNL have been removed from the scheme.

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		of the proposal upon the CNL and its setting are adequately assessed, avoided or mitigated. These include: • The ES should consider the requirements of NPPF paragraph 189 that development within the setting of the CNL should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas. • The ES should consider the CNL as a standalone receptor when assessing impacts of the proposal upon landscape character, visual and special qualities. • Viewpoint 6 should be relocated to the corner of Bustlers Hill at the junction with the path leading to bridleway SHER16. • Panels should be removed from several fields, in particular A11, A12, C2, C3 and C4 to avoid significant adverse landscape and visual effects on the CNL and its setting. These areas should be identified for habitat enhancement to further the purpose of CNL designation. • Pending the results of further assessment,		Paragraph 189 of the NPPF is considered in the Environmental Statement (ES) [EN010168/APP/6.1] has directed the design with the removal of all fields on the boundary of the CNL or within its immediate setting. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The CNL is fully assessed as its own standalone receptor in ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the CNL [EN010168/APP/6.3]. It assesses the impacts of the proposal upon landscape

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		consideration should also be given to removing the southern part of field A1, the remainder of field C6 and fields C7 and C9 and identifying these areas for habitat enhancement. • The ES should consider the impact of construction traffic upon the CNL, both by identifying the CNL as a receptor in the Transport Assessment in respect of impacts on tranquillity from increased traffic movements (in particular HGV movements) and also consider impacts upon the landscape and scenic beauty of the CNL from this increased traffic within the LVIA chapter. • Construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty. • The Glint & Glare Assessment should be expanded to provide more thorough consideration of potential heliographic effects on receptors located on public rights of way within the CNL and looking back towards the CNL.		character, visual amenity and the CNL's special qualities and addresses how the scheme seeks to further the purpose of the National Landscape's designation. Viewpoint 6 has been relocated. Fields C2, C3 and C4 have been removed from the scheme entirely to avoid significant adverse landscape and visual effects on the CNL and its setting. Panels within C1, C6, C8, the western section of C9, and the majority of C10 have been removed and the land used for ecological mitigation to protect the setting of the CNL. Panels within fields A11 and A12 have been removed and the land used for ecological mitigation to protect the setting of the CNL towards Sherston. All fields on the edge of the CNL provide habitat enhancement to further the purpose of the CNL designation and have been informed by the CNL Management Plan and the Cotswolds National Landscape (AONB) Landscape Strategy and Guidelines'

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		Please do not hesitate to contact me if you wish to discuss this response further. Yours sincerely, [REDACTED] MRTPI Planning Officer		Transport The most appropriate routes to the Site do utilise some roads within the CNL, including A-Roads and B-Roads. Less direct routes, further from the strategic road network and including a wider area would need to be utilised if all movement was to avoid the CNL resulting in a greater impact on the highway network. In addition, some roads outside of the CNL are not suitable for abnormal loads in terms of width, which removes them from any possible suitable route The ES [EN010168/APP/6.1] considers the impact of construction traffic on links in the CNL. The ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] concludes there are no significant adverse impacts on these links. Glint and Glare:

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				ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] and ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3] have been expanded to include an assessment of the receptors located on the PRow within the CNL and looking back towards it. The assessment concludes no significant glint and glare effects are anticipated upon any of the CNL receptors.
Cotswolds National Landscape	Transport and access / Landscape and visual	<i>Transport & Access – impacts upon the tranquillity of the CNL (comments upon PEIR Volume 1 Chapter 8 and Chapter 13)</i> Tranquillity is one of the 'special qualities' of the Cotswolds National Landscape, being one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. The Cotswolds National Landscape has relatively high levels of tranquillity, especially when compared with the surrounding urban areas, though we	No	This is noted by the Applicant. Environmental Statement (ES) Volume 1 Chapter 13 : Transport and Access [EN010168/APP/6.1] accords with the requirements set out in The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic'. Links that are in the Cotswolds NL are included in the ES Volume 1 Chapter 13: Transport and Access [EN010168/APP/6.1]. The effect of the Scheme on Tranquillity is

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		acknowledge that both the relative tranquillity and dark skies of the National Landscape are affected by the noise and artificial lighting of the neighbouring built environment. Policy CE4 of the CNL Management Plan referenced above states that proposals that are likely to impact on the tranquillity of the Cotswolds National Landscape should have regard to this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise pollution and other aural and visual disturbance. Proposals that are likely to impact on the tranquillity of the CNL should have regard to – and be compatible with – the National Landscapes Board's Tranquillity Position Statement. Section 4.5 of the Board's Tranquillity Position Statement referenced above outlines how The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for		assessed in Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA): • Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%). • Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.		
Cotswolds National Landscape	Transport and access / Landscape and visual	National Landscapes (AONBs) are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds National Landscape and should relate to both traffic flows and HGV movements. On this basis, it can be argued that an increase in traffic flows or HGV movements of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact	No	This is noted by the Applicant and is considered in the Environmental Statement (ES) [EN010168/APP/6.1]. ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], assesses the construction routes and links along the routes including those within the Cotswold National Landscape (CNL) and concludes there are no significant adverse impacts as a result of the development proposals.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		on the tranquillity of the Cotswolds National Landscape. This would apply to traffic movements on roads along the CNL boundary as well as to traffic movements on roads within the CNL. In this respect we would highlight the appeal decisions relating to proposed developments within the setting of the National Landscape at Mitton (appeal refs. 3301732 and 3301742, dated 25 November 2022)23, to the west of Tewkesbury. These appeals were refused as the Inspector was not satisfied that the submitted transport assessment had been undertaken using a sufficiently robust approach so that he could be confident that the developments would not result in a severe residual cumulative impact on the road network, or that the tranquillity of the National Landscape would not be unacceptably harmed. Having reviewed PEIR Volume 1 Chapter 13, the CNL is not considered as a receptor		ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] has been developed by providing a worst case assessment and therefore a sufficiently robust approach. The Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 Assessment on CNL and SQ addresses construction traffic movements within the CNL and concludes there are no significant adverse impacts as a result of the development proposals.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		in respect of the potential impacts of increased traffic flows. Indeed, the designation is not mentioned at all within Chapter 13. For the reasons outlined above, we consider that the Environmental Statement should consider the CNL as a sensitive receptor (high sensitivity) and consider the potential for significant environmental effects upon it in line with Rule 2 referred to above.		
Cotswolds National Landscape	Transport and access / Landscape and visual	Figure 13.1 of the PEIR shows a proposed construction traffic route to serve Sites A, B and C which runs from M4 J18 through the CNL along the A46, B4040, B4039, an unnamed road east to Grittleton and then the Alderton Road and Fosse Way, leaving the CNL at the crossroads with Fosse Lodge. The route then continues outside of the CNL up the Fosse Way. Table 13-17 identifies that overall traffic flows along the unnamed road west of Grittleton, Alderton Road and Fosse Way all within the CNL would exceed the 10% threshold in terms of total traffic. Increases	No	This is noted by the Applicant and is considered in the Environmental Statement (ES) [EN010168/APP/6.1]. On roads where baseline traffic flows are low, any increase in traffic flow may result in a predicted increase that would be higher than thresholds. Therefore, it is important to consider any overall increase in road traffic in relation to the capacity of the road. The ISEP Guidelines (Ref 13-1) state “For many effects there are no simple rules or formulae which define the thresholds of significance and there is, therefore, a need

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		in HGV flows along these roads would also exceed the 10% threshold along these routes as well as along the B4040 and B4039. HGV flows would increase by between 49.5% and 247.3% on these routes and as such even the 30% rule of thumb would be breached. Using Table 13-4, there would be a medium or high magnitude of impact for a number of these roads and when combined with the high sensitivity of the CNL, this would result in a major or major/moderate adverse effects on its tranquillity in multiple locations. As such we consider it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape, one of its special qualities, and this would conflict with Policy CE4 of the CNL Management Plan. It would also not seek to further the purposes of CNL designation.		for interpretation and judgement on the part of the assessor, backed up by data or quantified information wherever possible”, and “those preparing the Environmental Statement will need to make it clear how they have defined whether a change is considered significant or not” The ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], assesses the construction routes and links along the routes including those within the Cotswold National Landscape (CNL) and concludes there are no significant adverse impacts as a result of the development proposals. The link sensitivity identifier table is included at Table 13-3. Table 13-4 includes the sensitivity of Roads in the study area. ES Volume 2, Figure 13-7: Sensitivity of Links [EN010168/APP/6.2] provides a summary of the sensitivity of links for the construction of the Solar PV Sites

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] has been developed by providing a worst case assessment and therefore a sufficiently robust approach.
Cotswolds National Landscape	Transport and access / Landscape and visual	As well as impacts upon tranquillity the construction route has other potential adverse landscape implications. The proposed route serving Sites A, B and C runs through two separate LCTs within the CNL, the High Wold Dip Slope (LCT 9) for the stretch up the A46 and east along the B4040 for roughly half the distance between the A46 junction and Acton Turville and Dip Slope Lowland (LCT 11) for the remainder of the route until it leaves the CNL at Fosse Lodge.	No	This is noted by the Applicant and is considered in the Environmental Statement (ES) [EN010168/APP/6.1]. The sensitivity of links along the construction routes were identified using the methodology set out in table 13-3 in ES Volume 1 Chapter 13 Transport and Access [EN010168/APP/6.1]. The link sensitivity is summarised in ES Volume 2 Figure 13-7 Sensitivity of Links: Solar PV Sites [EN010168/APP/6.2]. The ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], assesses the construction routes and links along the routes including those within the Cotswold National Landscape (CNL) and concludes there are no significant adverse

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				impacts as a result of the development proposals.
Cotswolds National Landscape	Transport and access / Landscape and visual	Sections 9.13 and 11.12 of the Cotswolds AONB Landscape Strategies and Guidelines referred to above identify 'Road upgrading and improvements, especially of minor country roads, as a result of development or general improvement schemes' as a local force for change with potential adverse landscape implications. Sections 9.14 and 11.13 identify 'Excessive traffic and/or speed on minor local roads and lanes and increase in size of vehicle using lanes' as a further local force for change. These sections identify increased traffic movements, loss of tranquillity, danger to walkers/riders and other non-motorised users and damage to verges and roadside boundaries by HGVs as potential adverse landscape implications.	No	Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], assesses the construction routes and links along the routes including those within the Cotswold National Landscape (CNL) and concludes there are no significant adverse impacts as a result of the development proposals. An assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor-and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 Assessment on CNL and Special qualities addresses construction traffic movements within the CNL and concludes there are no significant adverse impacts as a result of the development proposals.
Cotswolds National Landscape	Transport and access / Landscape and visual	The Board considers that the potential adverse impact of the increase in HGV movements and other site traffic upon the tranquillity and landscape and visual qualities of the CNL has not been adequately considered within the PEIR. Moreover, from the data contained within the PEIR, it appears that the proposal would give rise to significant adverse impacts upon the tranquillity of the CNL and the Board is also concerned about the unspecified location and design of 'Highway Improvement Areas' mentioned within Chapter 13 and the potential impact upon	No	The sensitivity of links along the construction routes were identified using the methodology set out in Table 13-3 in Environmental Statement (ES) Volume 1 Chapter 13 Transport and Access [EN010168/APP/6.1]. The link sensitivity is summarised in ES Volume 2 Figure 13-7 Sensitivity of Links: Solar PV Sites [EN010168/APP/6.2]. ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], assesses the construction routes and links along the routes including those within the Cotswold

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		the landscape, special qualities and scenic beauty of the CNL, as well as the impact of abnormal loads to transport the larger transformers and substation equipment travelling through the CNL. Further detail within the ES and Outline Construction Transport Management Plan is required in this respect. We have similar concerns to those expressed above in terms of HGV and construction traffic movements related to the Cable Search Corridor. Further detail is also required regarding the proposed construction access routes for the Cable Route Corridor and whether these would pass through the CNL and what the potential impacts may be on its tranquillity, special qualities and landscape and scenic beauty.		National Landscape (CNL) and concludes there are no significant adverse impacts as a result of the development proposals. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				informed on the construction process, and to provide a contact for feedback should any issues arise. The Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 Assessment on CNL and Special qualities addresses construction traffic movements within the CNL and concludes there are no significant adverse impacts as a result of the development proposals.
Dorset and Wiltshire Fire and Rescue Service	Other Environmental Matters (Battery Safety)	Site address: Lime Down Solar Park, SW Malmesbury Proposal: Proposed solar park with associated Battery Energy Storage System (BESS) areas, located within Lime Down D. This pre-application falls within the area for which Dorset & Wiltshire Fire and Rescue Service (DWFRS) is responsible for delivering an operational and emergency response.	No	The Applicant makes note of this comment. In terms of the location, size, distribution and safety considerations associated with the BESS an Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] has been prepared and is submitted as part of the Development Consent Order (DCO) application. The Outline BSMP [EN010168/APP/7.21] is compliant with all the recommendations set out by Dorset and

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		We take this opportunity to highlight the below guidance for BESS installations. Whilst Dorset & Wiltshire Fire and Rescue Service would not object in principle to the lawful development of this site, it is recognised that these installations pose some specific hazards in the event of fire. Any fire involving grid-scale Li-ion battery storage would be treated as a hazardous materials incident in order that specialist technical advice can be obtained at the earliest opportunity. Since these sites generally fall outside the requirements of Building Regulations due to the temporary nature of the structures, the Fire and Rescue Service (FRS) are not generally in a position to comment or make representation regarding the design of the site. We take this opportunity to make early observations and provide comments or recommendations in line with current guidance to influence the development. We are keen to work with developers to ensure we understand the new technology and		Wiltshire Fire and Rescue including the most recently published (2025) NFCC guidance.

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		potential impact it may have on the surrounding area. The Regulatory Reform (Fire Safety) Order 2005 is limited in its application to such developments due to the low life risk during normal occupation. Process fire risk is generally regulated by the HSE but in the absence of regulation under COMAH, there is an expectation that fire and rescue services will initiate an emergency response in the event of an incident, in conjunction with the site operator's own plans. Research is ongoing to determine the most suitable method to extinguish a fire within Li-ion battery cells although current guidance recommends copious (and significant) volumes of water for a prolonged period. Our response crews have been provided with additional training and awareness in the hazards and risk management of BESS installations and as such the risk to them is considered to be controlled, although it		

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		would be true to say that the risks cannot be eliminated completely. The following recommendations should be considered at the design stage and early contact with the FRS for site familiarisation and exercising of emergency plans is strongly advised. The proposed safety measures should cover the construction, operational, and decommissioning phases of the project. Any development should not negatively impact on the Service's ability to respond to an incident. The Responsible Person must carry out and regularly review the Fire Risk Assessment and Risk Management Plan. It is our recommendation that before planning permission is granted, the layout, access, and provision of a suitable water supply comply as far as is reasonably practicable with the minimum requirements under B5 of Approved Document B, The Building Regulations 2010. Please also consult the latest guidance - NFCC BESS Planning Guidance Document.		

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Dorset and Wiltshire Fire and Rescue Service	Other Environmental Matters / Battery Safety	Water Supplies: Fire service resources for the provision of water include standard fire engines, bulk water carriers, and High Volume Pumps (HVPs) with additional resources available from neighbouring services through National Resilience capabilities if required. The delivery of water to a BESS site would inevitably require multiple vehicles for a prolonged period. Specific consideration should be given to water supply resilience for manual firefighting and the terrain over which fire service vehicles may have to drive to access the site. This is particularly relevant where remote sites may have limited access to fire hydrants and where multiple vehicles may be required to ensure continuous water supply. Current guidance states the water supply should be able to provide a minimum of 1,900 l/min for at least 120 minutes. DWFRS may wish to increase this requirement depending on location and their ability to bring	No	The Applicant makes note of this comment. In terms of the location, size, distribution and safety considerations associated with the BESS an Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] has been prepared and is submitted as part of the Development Consent Order (DCO) application. As per the Outline BSMP [EN010168/APP/7.21] the design will be fully compliant with the water supply specification outlined in the comment by Dorset and Wiltshire Fire and Rescue Service.

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		supplementary supplies to the site in a timely fashion. Hydrants should be subject to suitable testing and maintenance by the operator. If a suitable pressure-fed water supply is not available, then an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design, for example, a water storage tank or open water source.		
Dorset and Wiltshire Fire and Rescue Service	Other Environmental Matters (Battery Safety)	Site Access: Suitable facilities for safely accessing the site should be provided. Site contingency plans must consider the impact of wind direction on access and egress from the site which may impose operational constraints and an inevitable delay in firefighting. Current guidance states a minimum of 2 access routes. The provision of suitable turning space and appropriately sized footprint for hard standing to enable an effective firefighting response with multiple vehicles is essential. The inclusion of drenchers or fire service inlets to battery modules may be a design consideration. Access between BESS units and	No	The Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] submitted as part of the Development Consent Order (DCO) application includes details regarding site access for the fire service. This includes three separate Dorset and Wiltshire Fire and Rescue Service access points to the BESS sites which have been integrated to ensure firefighters do not have to drive through a smoke or gas plume to access the BESS. A swept path analysis for emergency vehicles has been undertaken and the roads have been confirmed as suitable for emergency vehicle access.

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		spacing: The NFCC guidance recommends a minimum of 6 metres between battery containers, unless suitable design features can be introduced to reduce that spacing. Any reduction in this separation distance should be considered and designed by a competent fire engineer. Individual site location and design will mean that distances between BESS units and site boundaries will vary. Proposed distances should consider risk and mitigation factors. Current guidance suggests a minimum distance of 25 metres prior to any mitigation.		The spacing between battery containers will be confirmed at detailed design stage. These details will be included within a detailed BSMP which will reflect the latest BESS safety codes and standards applicable at that stage.
Dorset and Wiltshire Fire and Rescue Service	Other Environmental Matters (Battery Safety)	Site Design: Sites should be maintained in order that the risk of potential fire spread between units is reduced. This will include ensuring that combustibles are not stored adjacent to units and access is clear and maintained. Areas within 10 metres of BESS units should be cleared of combustible materials and vegetation. Automatic suppression systems which aim to prevent thermal run-away within cells are a feature of most systems; however, the	No	As stated within the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21], areas within 10 m of BESS enclosures will not contain combustible vegetation and will not be planted with any new combustible vegetation. Where this is not feasible, a full risk assessment will be undertaken and appropriate mitigation applied in consultation with Dorset and Wiltshire Fire and Rescue Service (D&WFRS). Detection

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		effectiveness of these systems is variable. Alternative extinguishing media are not considered appropriate at this time. Early detection of a potential fire situation is critical and a fast response detection system linked to the battery management system is considered an essential component of the design. It is considered unlikely that fire service resources would be in attendance within the timeframe required to prevent a thermal run-away event once it has begun. An Information Box should be installed at the FRS access point. This should include emergency contact information, emergency isolation points, and details of the specific hazards on site. Once thermal run-away has occurred, defensive firefighting tactics would be the preferred option to allow the cell or module involved in fire to burn out and to protect surrounding modules and infrastructure. This would be undertaken on advice and with agreement from the Environment Agency and technical support		and suppression system requirements are also set out in the Outline BSMP and will be confirmed at detailed design stage in the detailed BSMP. The detailed BSMP will be approved by the relevant Local Planning Authorities in consultation with D&WFRS and the Environment Agency (EA). This will include provision of an Information Box at the Fire and Rescue Service access point, containing emergency contact information, isolation points and site-specific hazard data. The Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] requires lined drainage systems with shut-off valves around BESS and substation areas. These systems are designed to accommodate the 1 in 10 year rainfall event plus climate change allowance, together with a reasonable worst-case firewater/suppression volume. This embedded mitigation, assessed in

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		services. The potential for contaminated fire water runoff is acknowledged as an area for further consideration, although the type and level of contamination is not easily quantifiable. Our default position is therefore one of containment where possible although this is very difficult to achieve for large volumes of water during a dynamic incident. Consideration should also be given to engaging with the Environment Agency in relation to the protection of water sources or aquifers in the event of fire water runoff and any pollution control measures as may be appropriate. Airborne smoke and products of combustion would inevitably contain toxic effluents. Liaison with other agencies to support the air monitoring and warning and informing of local residents would form an essential part of the emergency response. It is our experience that most site designers and operators are keen to engage with fire		Environmental Statement (ES) Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], ensures containment of contaminated runoff wherever practicable and prevents uncontrolled discharges to local watercourses. Wider pollution prevention measures are secured through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. Airborne emissions from any incident will be managed in liaison with the EA, local authority and other agencies, with site operators required to support air monitoring and local resident communication where necessary.

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		services to ensure that their operational plans are fit for purpose, and we have already undertaken site visits to the larger installations within our area to assist with operational planning. We also recognise the concerns of residents in relation to the impact of these sites on the local environment and whilst we cannot provide assurance that we will not experience a fire in one of these sites, we are taking steps to ensure that the impacts are reduced as far as possible.		
Dorset Council	Project description and DCO process	Dorset Council has no comments to make in response to this consultation.	No	The Applicant makes note of this comment.
Easton Grey Parish Council	Transport	Traffic There is no adequate indication of exactly what “road improvements” will be made to enable tens of thousands of HGVs to access the sites. The area around Lime Down is made up of narrow rural roads, used by horse riders and cyclists as well as the community. The increased use of roads	No	Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This will be a requirement of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An outline CTMP [EN010168/APP/7.22] has been submitted

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		is likely to increase the danger of accidents to cyclists and horse riders. Any increase in traffic will further damage the verges to what is, in Easton Grey's case, on the road from the B4040 to Norton, a single track road with passing places. The increase in usage of the roads leading to Lime Down will be caused by closures of other roads to facilitate the construction of Lime Down and will be a further detriment to the residents of Easton Grey and neighbouring villages.		with the DCO. A road condition/dilapidation survey forms a measure set out within the CTMP. Any damage in the verge caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There is no intention for road closures to support the construction phase of the Scheme. Some localised traffic management may occur, especially for abnormal indivisible load movements. An assessment on safety and accidents is provided in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area.

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Easton Grey Parish Council	Soils and agriculture / Site selection and alternatives	The development size and its location The proposed Solar Park is of an industrial scale. Each of the 5 areas A-E is very large and the cumulative effect of those 5 separate areas would effectively change for ever an area of 46 square kilometres . It is noted that despite reference to mitigation it has been acknowledged that the panels and other infrastructure will remain visible. The proposal completely inappropriate to our area with its AONB, Conservation Areas, listed buildings and ancient monuments, including the historic unmade up areas of the Roman Fosse Way. The size and scale of the panels is unlike anything which has been built in the UK let alone in an area of exceptional landscapes and heritage. The materials provided as part of the consultation are extremely difficult to read and in some cases positively misleading. The image provided of a BESS storage	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental

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		area, an image shown at the consultation meetings, is not what is proposed for Lime Down. Instead of what appears to be a CGI or photoshopped image of a small, gravelled area with 6 rows of storage containers (taken from an angle which masks the scale of the units) what is proposed for Lime Down is a BESS with up to 270 shipping size containers covering an area of up to 25 acres (equivalent to 16 football pitches) close to a Grade 1 listed house. All that area will need to be hard surfaced surrounded by metal palisade fencing and CCTV and will emit a constant noise of cooling units in an area which is currently quiet and dark. We will lose quality agricultural land. Even on IGP's figures 30% is BMV. What consideration has been given to siting the proposed solar park in more suitable locations?		and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been "scored" to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. As part of the Site Selection Assessment Report [EN010168/APP/6.3], the Applicant has also considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites.

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Easton Grey Parish Council	Project description and DCO process	Preliminary and general comments We refer to the consultation letter dated 29th January, the Public Consultation Plan ("Plan") sent to residents and the Project Information Booklet dated January 2025 available at IGP consultation meetings and on the Lime Down website. As a small parish we have no funds to obtain expert advice on these documents or on the 4000 pages of material in the PEIR published on the start date of the consultation. We are thus at a significant disadvantage in fact checking and correcting any misleading statements or omissions. The vast majority of residents only received the Plan which was sent by post. It is noted that, whilst within the area of the Plan, the villages of Alderton, Grittleton, Luckington, Easton Grey, and Stanton St Quintin and the town of Malmsbury are neither identified nor named. This gives the	No	The purpose of the maps were intended to provide an overview of the surrounding area. The Applicant acknowledges that the maps do not illustrate all towns and villages within the vicinity of the Scheme. Unfortunately this is due to the scale of the map and is not something that can be amended due to the base mapping in use. The Applicant was made aware of an unintentional typographical error in the Consultation Leaflet, which incorrectly labelled "Hullavington Airfield" as "Hullavington Airport." The Applicant recognises the importance of using accurate and locally recognised place names and a corrected version of the Consultation Leaflet was uploaded to the Scheme website at the launch of the consultation. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions.

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		impression that the only town, and 50% of the villages within the area of the plan will not be affected or simply do not exist. It would be much easier to understand the proposal had the Plan utilised/replicated/overlaid the Ordnance Survey. We also note that a discontinued airfield from the second world war is marked as "Hullavington Airport". The Plan does not identify and include the recreational routes that appear on the Ordnance Survey Explorer Map Series sheet 168. The Project Information Booklet likewise also omits recreational routes. See for example the plan at 6.1 re Lime down A on page 15 of the Project Information Booklet. Whilst noting the major water courses the minor water courses that feed the river system and in particular the Sherston branch of the River Avon are not identified		Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Applicant team. Further information on the Stage Two statutory consultation and the consultation materials produced for it is provided in Chapter 7: Statutory Consultation under Section 47 of the Planning Act 2008 of the Consultation Report [EN010168/APP/5.1]. The Applicant notes that the maps presented at Stage Two statutory consultation do not identify the minor watercourses that feed the river system. The Plan was intended to be a summary of the major watercourses. All watercourses

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		on the Plan. There is nothing on the Plan to indicate the extent of traffic or the routes which will be used. These omissions are either deliberately intended to be misleading and/or demonstrate that IGP is ignorant of the areas surrounding and within which they plan Lime Down Solar Park and the impact it would have. [CONTINUED BELOW] The detail which can be found is the PEIR – running to 4000 pages - is not something which local people can realistically understand or be expected to understand. This makes the misleading impression given in the Plan all the more serious. The following are the more specific points that that we have at this stage but we reserve the right to raise further issues in due course. Given the lack of clarity of the document sent out for consultation we		within the Solar PV site and surrounding areas are considered in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage. Traffic routing can be found in ES Volume 3, Appendix 13-1: Indicative Study Area [EN010168/APP/6.3]. Additionally construction access points can be found in ES Volume 2, Figure 3-1: Indicative Site Layout Plan and ES Volume 2, Figure 13-5: Construction Access Locations [EN010168/APP/6.2]. Recreational spaces and long distance recreation routes are presented in ES Volume 2, Figure 16-2: Tourism and Recreation Sites and Figure 16-3: Long Distance Recreation Routes [EN010168/APP/6.2]. The Applicant acknowledges that the Preliminary Environmental Information Report (PEIR) and ES are lengthy technical documents. It is for this reason that a 'Non-

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		question whether a proper consultation can have or has taken place.		Technical Summary' (NTS) has been produced in both instances to provide a non-technical overview of the main findings of the assessments to aid understanding of the Scheme. The NTS for the ES is available in ES Volume 6: Non-Technical Summary [EN010168/APP/6.4] .
Easton Grey Parish Council	Project description and DCO process	Replacement, clean up costs and decommissioning Inconsistent answers were given at the consultation meetings about how frequently the panels and batteries would need to be replaced. There needs to be clarity about this since if the panels were to be replaced it would cause further disruption. There is no information about who and how the responsibility for clean up costs will be met and secured. This is the case not only for the potential adverse impact already noted during the existence of the plant but also at the end of the plant's life. There is a total lack of transparency about	No	The Materials and Waste Section within Environmental Statement (ES) Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] outlines the replacement strategy for the batteries and panels which is expected to be as follows: - Replacement of individual defective and broken Solar PV Panels on an ad hoc basis; - Planned replacement of all Solar PV Panels once during the operational phase (likely around year 40 of operation as this is considered to be the operational life of a panel). The Solar PV Panels are anticipated to be replaced over a 12-to-24-month period; - It is expected that the BESS could be

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		who the owner of the plant is likely to be if IGP sells its shares in Lime Down Solar Park Limited, a company incorporated in 2021 with no significant assets.		replaced up to five times during the operational phase; - It is expected that the operational life of Transformers will be 30 years; and - Other components such as Solar PV Mounting Structures, cabling and the Substation and BESS Area buildings are not anticipated to be replaced during the operation phase . A Development Consent Order (DCO) includes a requirement to decommission the project and return land to its original use (i.e., greenfield). Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. These requirements under a consented DCO, apply to the initial project owner and continue to apply in the event of any future change of ownership.
Easton Grey Parish Council	Project description	Procurement	No	As a member of the UK solar energy industry, the Applicant supports the

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	and DCO process	There is no explanation of where the panels will be manufactured. How can there be a guarantee that the solar panels and the lithium for the batteries will not be from sources which use slave labour?		development of an industry that promotes the highest possible levels of transparency, including in areas of environmental sustainability, social responsibility and good governance. This includes action to minimise and reduce the impact of extracting raw materials, to conserve water and to lower carbon emissions across the value chain, and to ensure the industry is free of any human rights abuses, including forced labour, anywhere in the global supply chain. In 2021, Solar Energy UK members committed to the development of a traceability protocol to increase sustainability across the industry. Since then, Solar Energy UK has taken robust action to drive change. This includes collaborating across the industry, with governments, and with sustainability experts, to develop the Solar Stewardship Initiative, which launched in December 2023.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Solar Stewardship Initiative is a solar-specific supply chain assurance scheme, and has published a dedicated environmental, social and governance standard. The Solar Stewardship Initiative will drive a more responsible, transparent, and sustainable value chain. To demonstrate our support for the principles set out in the Solar Stewardship Initiative, we will always seek to use PV modules where possible from manufacturers that can demonstrate they are following the SSI Standard in future projects. This industry-wide action complements the work that Solar Energy UK members have taken to strengthen supply chain standards, and we commit to continuing to use our best endeavours to deliver a sustainable industry.
Easton Grey Parish Council	Other Environmental Matters (Battery Safety)	BESS Apart from the inappropriate size of the BESS, which is larger than required to store energy produced by the panels and is, we	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21] and Plume Study

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		understand, a profit generating aspect of the scheme, we have serious concerns about the risk posed by the BESS were a fire to break out. The fumes from lithium batteries are toxic. Such fires are notoriously difficult to extinguish.		(Fire emissions modelling) that will be submitted for the Scheme are so far as reasonably practicable: • To minimise the likelihood of an event; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas; and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.
Easton Grey Parish Council	Noise and Vibration / Landscape and visual	Adverse Visual and Noise Impact We have already noted the security fencing and apparatus. The panels are to be 4.5 meters high, unlike the panels one sees by the edge of the motorway and positioned on undulating land and cannot be adequately screened, even after 15 years. We understand that the panels are to be motorised and move to follow the sun. This will create an increase in the negative effects of glare and produce noise pollution	No	An assessment of operational noise impacts has been set out within Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] . As explained in Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] , the tracking motors in the Solar PV Panels would be below the existing sound environment at properties and should therefore not disturb people.

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		to an area noted for its tranquillity. This will also have an adverse effect on the mental well being of our community.		The Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] has assessed the effects of proposed mitigation to screen views of Solar PV Panels. ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.5 [EN010168/APP/6.1] provides an assessment of Glint and Glare effects as a result of the Scheme (for both tracker and fixed panels). This chapter concludes that no significant effects are expected as a result of the Scheme. The Applicant has assessed mental health within ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This chapter concludes that with the implementation of embedded and additional mitigation such as the establishment of a Community Liaison Officer throughout the Construction – Decommissioning Phases of the project that no significant effects are predicted

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				upon the population in terms of mental health.
Easton Grey Parish Council	Landscape and Visual / Cultural heritage	Easton Grey The core of the Easton Grey Parish is a Conservation Area and almost the entirety of the Parish lies within the Cotswold AONB/Natural Landscape. This is not apparent from the Plan or the Project Information Booklet. The village includes an ancient monument in its bridge over the River Avon at the centre of the village. Easton Grey and the area of the Lime Down project are within the Cotswolds which is known internationally for its history and beauty. As a rural area we rely in no small way on tourism and agriculture for employment. The former is very much reliant on maintaining the beauty of the area with uninterrupted views and historic walks.	No	Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by Appendices 12.1 to 12.7 in ES Volume 3 [EN010168/APP/6.3], has assessed the potential impact of the scheme on built heritage and archaeological assets, and where required appropriate mitigation has been proposed. Embedded mitigation is outlined in Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and additional mitigation is set out in Section 12.11 9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]. The Bridge over River Avon (NHLE 1356034) was scoped out of the assessment, as the Scheme is not expected to result in any impact on this asset as set out in Annex C, in ES Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3].

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		As a community we do not object to renewable energy. However, in the case of solar it should and can be placed within the existing built environment or brownfield sites and nearer to the grid connection to avoid a long and as yet unspecified cable to Melksham and not on BMV land or areas of archaeological or historical significance.		A detailed assessment of the likely significance of effects from the Scheme on tourism destinations and recreational features, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual tourism and visitor destinations (including the Cotswold National Landscape(CNL)), PRoWs, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. An assessment of likely agricultural job losses as a direct result of the Scheme and as a result of supplier and downstream industry losses, has been assessed in ES Volume 1, Chapter 16: Socio-Economics,

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				Tourism and Recreation [EN010168/APP/6.1] and supported by specific assessment of agricultural circumstances in ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate in order to reduce development impacts and control any negative effects on the environment. Parcels within the setting of the CNL, on the boundary of the CNL have been removed from the scheme. Paragraph 189 of the NPPF is considered in the ES [EN010168/APP/6.1] has directed the design with the removal of all fields on the boundary of the CNL or within its immediate setting. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES

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				Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The CNL is fully assessed as its own standalone receptor in ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3]. It assesses the impacts of the proposal upon landscape character, visual amenity and the CNL's special qualities and addresses how the scheme seeks to further the purpose of the National Landscape's designation. Fields C2, C3 and C4 have been removed from the scheme entirely to avoid significant adverse landscape and visual effects on the CNL and its setting.

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				Panels within C1, C6, C8, the western section of C9, and the majority of C10 have been removed and the land used for ecological mitigation to protect the setting of the CNL. Panels within fields A11 and A12 have been removed and the land used for ecological mitigation to protect the setting of the CNL towards Sherston. All fields on the edge of the CNL provide habitat enhancement to further the purpose of the CNL designation and have been informed by the CNL Management Plan and the Cotswolds National Landscape (AONB) Landscape Strategy and Guidelines'
Easton Grey Parish Council	Hydrology, flood risk and drainage	Flood risk and potential pollution to the river Avon Easton Grey is particularly sensitive to flooding. As an area outside the red line of the Lime Down site the authors of the documents supporting the proposal seem to	No	The Applicant acknowledges the concerns raised by Easton Grey Parish Council regarding flooding risks in the area. The report by [REDACTED] and the data from the Fosse Way measuring station provide valuable insight into the flooding risks in Easton Grey. While the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		be ignorant of the specifics that apply to Easton Grey and the increased risk and damage it will create. We refer to the attached report prepared by [REDACTED] in relation to Storm Bert. We also bring to your attention the government managed measuring station where the Fosse Way crosses the Sherston branch of the river Avon. In that regard please see https://check-for-flooding.service.gov.uk/station/3035 . This measuring station is circa 1km downstream from the bridge at Easton Grey, which is, as already noted, an Ancient Monument. The report notes the river flows on the occasion of Storm Bert and the higher levels that occurred in November 2012 (see page 6). The report details the effects of Storm Bert at Tanners Hill Bridge and Forlorn Bridge (see pages 10 and 11). All of the water collecting at those bridges are up stream of Easton Grey and, with additional water entering from water courses over the		report is helpful in understanding observed flooding, it is important to note that single rainfall events, such as Storm Bert, cannot be used in isolation to assess flood risk. As discussed with [REDACTED], flood risk assessments are based on long-term data from the Flood Estimation Handbook (FEH), which considers multiple years of rainfall data and catchment characteristics. This approach provides a reliable and consistent basis for understanding flood behaviour and informing appropriate mitigation, in line with Environment Agency and Lead Local Flood Authority guidance. The vast majority of the developed areas of the scheme have been sequentially allocated within Flood Zone 1 and outside Flood Zones 2 and 3. Further information on this is available in the Planning Statement, Annex C: Sequential Test / Exception Test [EN010168/APP/7.2]. This has been achieved through the application of a sequential approach to site layout, supported by topographic analysis and

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		intervening route of the river, flow down to Easton Grey. At page 11 of the report the effect of the flow restriction which causes backing up is noted and the same effect occurs at the Easton Grey Bridge see page 13 of the report and the photograph below showing the arches of the bridge almost completely filled by the raised water levels. In effect the bridge, once the water rises sufficiently, acts as a dam causing the water to back up into the centre of the village causing a potential serious flood issue to residential properties. To date this has not occurred but any increase in surface water entering the river upstream from Easton Grey increases that risk. The threat to the village is exacerbated by the fact that the sewage treatment plant that serves most of the village sits beside the Green in the centre of the village before discharging into the river. The location and levels are shown in a measured plan done by D&H surveys. The position in this regard		flood mapping. As part of the broader constraints-led design process, surface water flow routes have been identified using topographic data and national flood mapping and have been avoided wherever practicable. This includes avoiding low points and known exceedance routes. Solar PV panels are proposed to be located on permeable ground with a maintained vegetative cover, and the area beneath the panels will be enhanced through the establishment of a species-rich wildflower meadow secured through the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18]. This approach helps preserve infiltration potential and provides a stable, undisturbed soil structure. Research (Cook and McCuen, 2013) supports that runoff from solar arrays over such grassed or meadowed surfaces is not significantly different from agricultural land. As such, the transition from arable land to managed grassland beneath panels is anticipated to

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		is noted in the Easton Grey Flood Plan (attached). We understand that solar panels will increase water concentration which will in turn concentrate flow rates as the river passes through Easton Grey. The report concludes that we are in an area where it would be easy to increase the frequency and intensity of flooding by inappropriate development such as Lime Down Solar. [CONTINUED BELOW] We adopt the points made in that report in their entirety with the following additional comments. The result of increased risk of flood will not only be to properties but to rainwater entering the sewage system. It is of note that the licence granted by the Environment Agency South West Region (consent number 101899 and dated 13th May 2002) has a condition that surface water will be kept separate from domestic effluent. Given		support infiltration and reduce the volume and velocity of surface water runoff. Areas where hardstanding will be required, including the BESS and substations, incorporate surface water drainage strategies, as set out in ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessments and Drainage Strategies [EN010168/APP/6.3], designed to manage runoff in accordance with Wiltshire Council policy. These strategies include attenuation storage to accommodate the 1 in 100-year storm event plus climate change, with discharges restricted to greenfield runoff rates. These drainage systems are intended to manage rainfall events and maintain existing runoff characteristics. In addition, sealed drainage systems are included to protect water quality and prevent pollution in the event of a fire at the BESS, with provision for the containment of firefighting water via lined drainage and isolation valves. These measures will be subject to regulation and ongoing

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		the noted increase in risk to flooding and pollution has any consideration been given to this and if so, what? How are the affected householders in Easton Grey to be held harmless from such effects and potential legal or other action arising from a breach of the referenced licence where the causation is, with advance knowledge, the fault of others.		maintenance to ensure continued performance and compliance. Surface water and foul flows will remain fully separated, with no connection to existing public or private wastewater systems, ensuring that additional runoff from the Scheme cannot interact with or overload the Easton Grey sewage treatment works. In addition, the cessation of agricultural activity on the site will significantly reduce the use of agrichemicals such as fertilisers and pesticides, lowering the potential for pollution to both surface water and groundwater. The drainage design will also ensure that surface water and foul flows remain separate, in line with regulatory requirements. In summary, the development has been designed to avoid areas at higher risk of flooding, manage runoff from impermeable surfaces, and retain natural flow paths. The

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				measures in place will ensure that there is no increase in flood risk to Easton Grey or downstream receptors, nor any increase in pollution risk to the River Avon. Existing flood issues in the area are acknowledged, but the scheme will not exacerbate them.
Easton Grey Parish Council	Ecology and biodiversity	Ecology and biodiversity There are many assurances in the documents of how Lime Down Solar Park will improve biodiversity. However without key documents to support the statements it is not possible to assess and comment on how Lime Down would impact ecology and biodiversity or the extent to which mitigation measures intended to protect local wildlife will be adequate. There is no information about who will be responsible for maintenance of the proposed ecological mitigation zones. During the consultation conflicting answers were given by IGP representatives on this. There are no maps showing the precise	No	A full assessment of potential impacts of the Scheme on ecology and biodiversity is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], including proposed mitigation, compensation and enhancement measures. Figures illustrating landscaping and ecological mitigation proposals, are provided in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation [Plan EN010168/APP/6.2]. Construction phase ecological protection measures are set out in the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] and the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] provides details of

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		extent of the proposed buffer zones and again, no information as who will be responsible for their effective management during the lifetime of the scheme. There is a significant lack of detail in relation to the destruction of hedgerows and trees which will be necessary to allow access by HGVs to the access points identified. The lack of detail in relation to the panels and the glint from them and security lights, and the noise from the motors and other infrastructure makes any assessment of the impact on sensitive animals and insects, during the operative period of the scheme, let alone during construction, impossible to judge.		habitat creation, enhancement and management.
Easton Grey Parish Council	Community benefits and impact	Lack of Benefit to the Local Community As far as we are aware no benefit will accrue to the local community. All electricity generated will go to the main grid and all profits from the power generated and from	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy

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		the BESS trading will go to the owner of Lime Down Solar Park Limited. The ultimate ownership is very likely to be foreign. The local community and its businesses will suffer detriment and increased risk of flooding and the ruination of areas of particular natural beauty and historic interest, right beside an area of Natural Landscape.		production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community

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				Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. The Community Benefit Fund is separate from the Development Consent Order (DCO) process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and

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				cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance. The Applicant is in full agreement with guidance published in May 2025 by the Department for Energy Security & Net Zero (DESNZ)- 'Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure', which sets out that local communities should feel tangible and enduring benefit from their role in creating a low-cost, clean energy system in the UK. Community benefits are already delivered on a voluntary basis around the country, and so the Applicant is confident that this approach is suitable for this Scheme.
Environment Agency	Hydrology, flood risk and drainage	We are writing to make you and the Planning Inspectorate aware of new flood and coastal erosion risk data, some of which may affect your project. You may already be aware we are producing new	Yes (assessment only).	The latest flood risk and coastal erosion risk data has been used within the assessment presented in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology,

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		data following the release of our National assessment of flood and coastal erosion risk in England 2024 report in December. What new data we are publishing and when. On 28 January 2025 we published: • New surface water flood risk extents, including a climate change scenario – may inform flood risk assessments but will require additional assessment as the climate change scenario is likely to fall short of what’s needed in planning • New surface water flood risk depths, including a climate change scenario – unlikely to be suitable for use in planning due to the climate change scenario chosen and because of how depth information is derived • New coastal erosion risk data – suitable for use in planning • New risk of flooding from rivers and sea data – not suitable for use in planning because of how flood risk management		Flood Risk and Drainage [EN010168/APP/6.1].

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		infrastructure is accounted for and due to the climate change scenario chosen On 25 March 2025 we will publish further data, all of which will be relevant to planning: • Updated Flood Zones • River and sea flood risk extents with defences for both a present day and a climate change scenario in the 3.3%, 1%/0.5% and 0.1% annual exceedance probability events • River and sea flood risk extents without defences for both a present day and a climate change scenario in the 1%/0.5% and 0.1% annual exceedance probability events Following publication, we plan to update flood risk datasets every 3 months and coastal erosion risk datasets every 12 months to take account of any new local models. In 2025/26, flood risk updates may be more or less frequent as the new approach is established.		

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		We also expect to publish further data in due course including: • Surface water flood risk climate change extents using a climate change scenario more likely to be suitable for use in planning • Surface water flood risk depth information suitable for use in planning • River and sea flood depth information for both a present day and a climate change scenario, suitable for use in planning		
Environment Agency	Hydrology, flood risk and drainage	Where new data will be available All our new data will be made freely available via the Defra Data Services Platform. The data published in January is available across various services: • Check your long term flood risk • Shoreline Management Plan Explorer • Check coastal erosion risk for an area in England The data published in March will be available on the Flood Map for Planning service. The March data will not be available to you prior to publication.	Yes (assessment only).	The latest flood risk and coastal erosion risk data has been used within the assessment presented in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Environment Agency	Hydrology, flood risk and drainage	Our expectations Once the new data is published, we will expect you to assess whether it has any implications for your proposed development. In many cases our understanding of risk will not change significantly, but you will need to confirm to us that this assessment has been completed, and whether any additional assessments or changes to the proposed development are considered necessary in light of the new data. We will continue to provide advice in response to consultations, following the usual process – including cost recovery. The Infrastructure Planning (Fees) (Amendment) Regulations 2024 allow us to recover our costs for all stages of the NSIP process from 1 April 2024. Therefore, additional charges may be incurred on submission of any updated information. In the meantime, where relevant, flood risk	Yes (assessment only).	The latest flood risk and coastal erosion risk data has been used within the assessment presented in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] .

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		and coastal change will be noted as 'outstanding issues' until such time as we are satisfied that the new data has been assessed and any potential impacts considered. Next steps Please look out for the data planned for release on 25 March 2025. We will write to you again when the date for subsequent data releases is known.		
Environment Agency	Project description and DCO process	Section 42 Consultation – Preliminary Environmental Information Report – Lime Down Solar Park, Wiltshire Thank you for consulting us on the Preliminary Environmental Information Report (PEIR) for Lime Down Solar Park. Further information is required for the Environment Agency (EA) to provide a definitive response to relevant environmental impacts. This is important so	No	The Applicant has continued to engage with the Environment Agency throughout the pre-submission stage. This included engagement regarding the design of the Scheme and approach to the assessment, as detailed in Table 11-2 of Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. The Applicant has shared details regarding the Scheme and assessment with the Environment Agency,

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		we can provide the best possible advice to the Planning Inspectorate. It is strongly recommended that any further reports, statements or surveys that require our review and /or agreement are submitted as soon as possible to resolve any issues before the Development Consent Order (DCO) is submitted. We look forward to continuing to work with you as the detailed proposals continue to develop, and to reviewing and providing advice on relevant supporting documents as these are generated. If you have any questions about any of our advice, please contact us. Our headline comments are listed below – more detailed advice on key issues is listed in the various appendices to this letter.		including the proposed watercourse crossing schedule and method statement. The Applicant will continue to engage with the Environment Agency during the pre-examination and examination stages.
Environment Agency	Ecology and biodiversity	Topic: Ecology and Biodiversity Headline Comments: Ecological impacts have not been appropriately assessed. The	No	The Applicant makes note of this comment. Following the preliminary assessment work presented in the Preliminary Environmental Information Report (PEIR), the Ecology and Biodiversity assessment has now been

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		scope of assessments needs to be expanded.		completed and is documented within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . The scope of the assessments was agreed with the Environment Agency during meetings in October 2024 and May 2025.
Environment Agency	Hydrology, flood risk and drainage	Topic: Flood Risk and Flood Modelling Headline Comments: It is not currently possible to fully review and assess the risk of flooding to and from the proposed development as the relevant information is yet to be submitted.	No	The Applicant acknowledges that a full assessment of flood risk was not possible at the PEIR stage as the development layout had not yet been finalised. Feedback received on the PEIR has informed the revised layout, which has formed the basis for the updated Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. Full details are set out in Environmental Statement (ES) Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], supported by Flood Risk Assessments and Drainage Strategies provided in ES Volume 3 Appendices 11-1 to 11-9 [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The scope and methodology for the updated Flood Risk Assessment and Drainage Strategies were developed through engagement with the Environment Agency and Wiltshire Council as Lead Local Flood Authority, including meetings held in October 2024. At these meetings it was agreed that: • Site-specific hydraulic modelling would be undertaken for the Gauze Brook (Lime Down D), while national datasets and topographic analysis would be applied elsewhere as proportionate; • Climate change allowances would apply the Environment Agency's upper estimates to provide a reasonable proxy for future flood risk; • Runoff would be restricted to greenfield rates, with lined drainage and shut-off valves required for BESS and substation areas; and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Embedded mitigation (e.g. SuDS, buffer zones, permeable tracks) would provide additional resilience. This targeted and proportionate methodology was agreed with the Environment Agency as suitable for the nature and scale of the Scheme, and the submitted Flood Risk Assessments and Drainage Strategies provided in ES Volume 3 Appendices 11-1 to 11-9 [EN010168/APP/6.3] demonstrates that flood risk has been robustly addressed in line with national and local policy requirements.
Environment Agency	Hydrology, flood risk and drainage	Topic: Water Resources Headline Comments: The water demand for the project is unclear. A water resources strategy needs to be supplied.	No	An Outline Water Resources Assessment [EN010168/APP/7.26] has been submitted as part of the Development Consent Order (DCO) to provide an early-stage evaluation of quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Environment Agency	Soils and Agriculture (Ground Conditions)	Topic: Groundwater and Contaminated Land Headline Comments: Not all potential risks have been identified and assessed. The scope of assessments needs to be expanded.	Yes (assessment only).	Following the preliminary assessment work presented in the Preliminary Environmental Information Report (PEIR), the potential risks associated with groundwater and contaminated land have been reassessed, in line with comments from the Environment Agency (EA). Further details are provided in Environmental Statement (ES) Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].
Environment Agency	Hydrology, flood risk and drainage	Any requests to disapply any permits or consents should be sent to us in writing as soon as possible, to allow us sufficient time for their consideration (minimum 6 months). Please note this response does not represent our final view in relation to any future DCO, or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission. Our advice has been provided under our	No	As detailed in Environmental Statement (ES) Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], a meeting between the Applicant and the Environment Agency (EA) was held to discuss permitting requirements and potential disapplication requests. It was agreed that the only disapplication being sought relates to Flood Risk Activity Permits (FRAPs), to enable certain watercourse crossings and drainage outfalls to be authorised through the Development Consent Order (DCO) rather than separate permitting. Discussions remain ongoing, and any formal

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		chargeable service agreement: ENV PAC/1/NIT/00055.		disapplication request will be submitted in writing with appropriate lead-in time to support the EA's review. This approach does not disapply the need for any other permits or consents. Future applications, including any environmental permits, will be prepared in line with relevant guidance and based on the available information at the time.
Environment Agency	Project description and DCO process	Appendix A – Reviewed Documents Document Name Reference/Date/Version Preliminary Environmental Information Report Volume 1, Chapter 3: The Scheme January 2025 Preliminary Environmental Information Report Volume 1, Chapter 9: Ecology and Biodiversity January 2025	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Preliminary Environmental Information Report Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage January 2025 Preliminary Environmental Information Report Volume 1, Chapter 19: Ground Conditions and Contamination January 2025 Preliminary Environmental Information Report Volume 1, Chapter 20: Other Environmental Matters January 2025 Preliminary Environmental Information Report Volume 2, Figure 8-15-1 to 8-15-5 Lime Down Site A to E Indicative		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Masterplan January 2025 Preliminary Environmental Information Report Volume 3, Appendix 3-2: Cable Route Construction Method Statement January 2025 Preliminary Environmental Information Report Volume 3, Appendix 9-6: Otter and Water Vole Survey Report January 2025 Preliminary Environmental Information Report Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		January 2025 Preliminary Environmental Information Report Volume 3, Appendix 19-1 to 19-17: Desk Studies January 2025 Preliminary Environmental Information Report Volume 3, Appendix 19-18: Preliminary Risk Assessment Approach and Methodology January 2025		
Environment Agency	Ecology and biodiversity	Appendix B – Ecology and Biodiversity FBG1 - Watercourse Crossing Methods Document Reference(s): Lime Down Solar Park PEIR Chapter 3, Section 3.4.9 Chapter 9, Table 9-8 Appendix 9-6	No	Watercourse crossings will be carried out via a combination of open cut trenching and trenchless techniques such as Horizontal Directional Drilling (HDD). HDD would be employed where ecological features of an increased importance or sensitivity (e.g. main rivers) are to be crossed by the route, and where less impactful routes could not be followed. A schedule of watercourse crossings is provided in Environmental

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		Issue: Use of open cut method for crossing of watercourses where presence of protected species (such as water vole, otter, fish and white-clawed crayfish) and habitat is unknown. Impact: Open cut methods have the potential to cause significant harm to protected species and their associated habitat which could result in destruction and mortality. Solution: Trenchless techniques such as Horizontal Directional Drilling (HDD) should be used.		Statement (ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [EN010168/APP/6.3]. The Applicant has assessed the impact of water course crossing methods in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. With the inclusion of additional mitigation (such as the presence of an EcoCoW to oversee any ditch trenching work) to be secured by the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19], no significant residual effects are expected.
Environment Agency	Ecology and biodiversity	Additional narrative/explanation: HDD, as a less invasive method, reduces the ecological impact and preserves the integrity of sensitive ecosystems. If open-cut trenching methods cannot be avoided in areas where protected species/ notable fish populations are present, we would require a comprehensive justification	No	Watercourse crossings will be carried out via a combination of open cut trenching and trenchless techniques such as Horizontal Directional Drilling (HDD). HDD would be employed where ecological features of an increased importance or sensitivity (e.g. main rivers) are to be crossed by the route, and where less impactful routes could not be followed. Please refer to Environmental

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		for not utilising HDD. Surveys have not been conducted across the whole site. Therefore, we would also require the appropriate surveys to be conducted across the site and at the locations proposed for open-cut crossings detailing the habitat quality at the location of each crossing. Further information regarding required surveys is detailed below. <i>White Clawed Crayfish</i> A suitably qualified ecologist would need to conduct white-clawed crayfish surveys of suitable watercourses within the Scheme during the appropriate time of the year, following standard survey guidelines. For survey of white-clawed crayfish we recommend using artificial refuge traps as they are more effective than manual search methods which would not necessarily detect individuals if there is a low population density. This method also allows traps to be left in-situ indefinitely with no		Statement (ES) Volume 3, Appendix 3-2: Cable Route Construction Method Statement [EN010168/APP/6.3] for further details. The Applicant has assessed the impact of watercourse crossing methods in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. With the inclusion of additional mitigation (such as the presence of an ECoW to oversee any ditch trenching work), no significant residual effects are expected. In terms of habitat quality surveys, as stated in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] an Extended Habitat Classification (UKHab) Survey has been carried out (including with the Cable Route Corridor). The results are reported in ES Volume 2, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3]. A water crossing schedule can be found in ES Volume 2, Appendix 11.1 Flood Risk

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		risk to accidental entrapment of non-target species such as water vole. <i>Otter and Water Vole</i> Otter and water vole field surveys have not been completed within the cable route search corridor. Aerial imagery and desk-based assessments may help identify suitable habitats, but field surveys are required to fully determine the presence/absence and distribution of a species. There is potential to disturb otters or water voles during construction should a shelter (holts, couches and burrows) be present which is an offence under the Wildlife and Countryside Act (1981) and Conservation of Habitats and Species Regulations (2017). Field surveys must be completed to determine the locations of shelters (holts and burrows) to inform mitigation design and the need for a mitigation licence. <i>Fish</i> The PEIR states that fish have been		Assessment and Drainage Strategy Covering Report [EN010168/APP/6.3]. The survey scope for the Cable Route Corridor was determined taking into account the habitats that will potentially be affected by the cable works, as well as the temporary nature of the cable installation works. This included: an Extended UK Habitat Classification (UK Hab Survey), a Modular River Physical (MoRPH) survey, a qualitative assessment of habitat suitability for badgers, bats, riparian mammals including otters, water voles and beavers, breeding birds, reptiles, terrestrial and aquatic invertebrates and fish. Further recommendations were made following this work either in the design of the Scheme (i.e. routing the cable route working area to avoid potential impacts) or in the implementation of additional mitigation (such as pre-commencement surveys, sensitive working methods and

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		assumed to be present in some watercourses. However, for those watercourses where the presence of fish has not been assumed and open-cut trenching is proposed, we would require appropriate and proportionate surveys. Surveys should ensure that there is confidence in the baseline environmental conditions and fish populations within waterbodies. If waterbodies are flumed or coffer dammed and thus require over-pumping, it could be necessary to conduct a fish rescue and relocation. Any over-pumping should ensure that screens are fitted on inlets and outlets of pumps and that they are compliant with the Eels (England and Wales) Regulations 2009. Key spawning and migration periods would need to be avoided. <i>Entrapment</i> Open trenches would need to be covered over to prevent wildlife from falling in and		seasonal timing of works, and works requiring the presence of Ecological Clerks of Works). Further information on these measures is provided in the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. In terms of entrapment, there are measures included in the Outline Ecological Protection and Mitigation Strategy (OEPMS) [EN010168/APP/7.19] These measures include covering open trenches to prevent wildlife from falling in, the inclusion of ramps to enable wildlife to escape, and fencing compounds and trenches.

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		ramps should be used to enable wildlife to escape. Compounds and trenches should be securely fenced during construction.		
Environment Agency	Ecology and biodiversity	FBG2 - Environmental Legislation Document Reference(s): Lime Down Solar Park PEIR Chapter 9, Section 9.3.2 Issue: Environmental legislation does not list recent (2024) legislation pertaining to Biodiversity Net gain (BNG). Impact: Risk of not considering new environmental definitions in legislation in respect of BNG, such as 'irreplaceable habitat', along with related offences to said habitats. Solution: Include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.	Yes	Please refer to Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] which includes a comprehensive list of legislation relevant to the Ecology and Biodiversity assessment, which includes the 2024 Biodiversity Gain Requirements.

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Environment Agency	Ecology and biodiversity	FBG3 - Invasive Non-Native Species Document Reference(s): Lime Down Solar Park PEIR Chapter 9, Section 9.10.297 Issue: Potential for Invasive Non-Native Species (INNS) American signal crayfish to be present in watercourses. Impact: Potential to cause/allow spread of crayfish plague. Solution: Strict biosecurity measures such as disinfection of equipment/clothing that encounters water. Additional narrative/ explanation American signal crayfish carry the deadly crayfish plague which kills native, white-clawed crayfish. American signal crayfish is present in the Bristol Avon through Malmesbury and downstream. This species could be present in other neighbouring	Yes	A Method Statement setting out biosecurity to prevent the spread of signal crayfish is included in the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] .

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		tributaries. There are records of plague outbreaks in this catchment. If white-clawed crayfish are present in the Gauze Brook and tributaries, it is essential that measures are taken to prevent spreading the plague to unaffected watercourses as moving from different watercourses could facilitate spread.		

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Environment Agency	Ecology and biodiversity / Noise and vibration	FBG4 - Noise and Vibration Document Reference(s): Lime Down Solar Park PEIR Chapter 9, Section 9.10.280 Issue: Impacts on fish from continuous noise associated with vibration created by HDD has not been included in the assessment. Impact: Sensitive fish species could be disturbed during construction and decommissioning activities. Solution: The EIA should include an assessment on the risk of fish populations being impacted by noise from HDD during construction. Mitigation and management of any impacts should be detailed in the Outline CEMP. Standard mitigation should include avoiding HDD activity during sensitive fish migration and spawning times or drilling to a depth where any significant noise becomes negligible to fish.	Yes	An assessment of the impacts of noise and vibration on sensitive fish species as a result of HDD activities is included within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. With the inclusion of mitigation measures detailed in the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] and Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] (such as minimum setbacks for launch/reception pits and minimum depths for drilling below channel beds) no significant effects are expected.

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Environment Agency	Hydrology, flood risk and drainage	Appendix C – Flood Risk and Flood Modelling FR1 - Flood Risk Assessment Document Reference(s): Lime Down Solar Park PEIR Appendix 11.1 Issue: There are some areas within the Order Limits that are situated within Flood Zones 2 and 3 which have a higher probability of flooding from rivers and/or the sea. Impact: A sequential approach must be applied to the siting of permanent infrastructure and temporary components of the project. The Sequential Test will be required to be passed, as outlined in the National Policy Statement (NPS) EN-1, and the National Planning Policy Framework (NPPF).	No	The Applicant acknowledges the presence of Flood Zones 2 and 3 within parts of the Order Limits. As stated within Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] a sequential approach has been taken to the siting of infrastructure to avoid areas of higher flood risk wherever reasonably practicable, supported by embedded mitigation measures set out in the Environmental Statement. Feedback received on the Preliminary Environmental Information Report has informed the refinement of the site layout, which has underpinned the updated Flood Risk Assessment presented within ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. A separate Sequential and Exception Test has been undertaken and is submitted as Annex C to the Planning Statement [EN010168/APP/7.2]. This demonstrates

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		If the site needs to be situated in areas at risk of flooding, then The Exception Test must also be applied and the Flood Risk Assessment (FRA) must assess flood risk from all sources of flooding. Solution: Include the above tests in the FRA. Additional narrative/ explanation Compliance with policy regarding the Sequential Test is not within the remit of the EA but with the Local Planning Authority (LPA). We are emphasising the need for the FRA to demonstrate the Sequential Test has been passed.		how the siting of infrastructure has applied a sequential approach in line with the requirements of NPS EN-1, the NPPF and Wiltshire Core Strategy. The Test confirms that the majority of the Scheme is located within Flood Zone 1, with only small areas of panel arrays located within Flood Zones 2 and 3 where flood depths are less than 1 m and where resilience measures are embedded. The most vulnerable infrastructure, including the substations and Battery Energy Storage Systems, has been located entirely within Flood Zone 1. The Exception Test, also included in Annex C to the Planning Statement [EN010168/APP/7.2], confirms that the Scheme provides substantial wider sustainability benefits, will be safe for its lifetime and will not increase flood risk elsewhere, with betterment delivered at the Lime Down D substation and BESS area through reduced runoff rates.

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Environment Agency	Hydrology, flood risk and drainage	FR2 - Indicative Site Plans Document Reference(s): Lime Down Solar Park PEIR Indicative Masterplan Lime Down Site A-E Issue: Across the indicative site plans there are many watercourses which have not been captured within plans. This includes both Main Rivers and Ordinary Watercourses. Impact: If all watercourses are not represented this may lead to risk not being accurately represented. Solution: Add all Main Rivers and Ordinary Watercourses to site plans.	Yes	The Applicant acknowledges this comment. The site plans presented at Preliminary Environmental Information Report (PEIR) stage were based on the Statutory Main River dataset and the 'OS OpenZoomstack – Highlight Water' basemap layer to identify watercourses, including Ordinary Watercourses and land drains. These open-source datasets have been supplemented with topographical data, and further cross-referencing with detailed site survey information have been used to inform the Environmental Statement (ES) [EN010168/APP/6.1]. It is recognised that some smaller or ephemeral features may not have been captured. To address this, EA surface water flood mapping has also been reviewed to help identify potential flow routes associated with unrecorded watercourses. Further details are provided in ES Volume 2, Figure 11-1 to 11-8 [EN010168/APP/6.2] which supports ES

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				Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].
Environment Agency	Hydrology, flood risk and drainage	FM1 - Risk of Flooding from Surface Water mapping Document Reference(s): Lime Down Solar Park PEIR Chapter 11, Section 11.6.15 Issue: For unmodelled watercourses the Environment Agency Surface Water Flood Map has been used as a proxy for flood risk with allowances applied using the Mannings equation. The Risk of Flooding from Surface Water (RoFSW) mapping has recently been updated (January 2025). The assessment of flood risk could be out of date based on recently published information. Impact: Potentially inappropriate assessment of flood risk.	Yes (assessment only).	Updated Risk of Flooding from Surface Water mapping (January 2025) has been reviewed and incorporated in the revised Environmental Statement (ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. For unmodelled watercourses, the Environment Agency Surface Water Flood Map was used with allowances applied using Manning's equation. This methodology has been agreed as appropriate for the scale of the Scheme.

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		Solution: Review the updated RoFSW mapping.		
Environment Agency	Hydrology, flood risk and drainage	FM2 - Flood Map for Planning Document Reference(s): Lime Down Solar Park PEIR Chapter 11, Section 11.7.4 Issue: The risk of fluvial flooding has been interpreted from the Environment Agency's online Flood Map for Planning. The Flood Map for Planning will be updated at the end of March 2025. The assessment of flood risk is based on information which will soon be updated. Impact: Potentially inappropriate assessment of flood risk. Solution: Review the updated Flood Map for Planning once this is published at the end of March 2025. Additional narrative/ explanation Further information is available online at:	Yes	The updated Environment Agency (EA) Flood Map for Planning (March 2025) has been incorporated into the revised Environmental Statement (ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. In many places, flood zone extents have been reduced.

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		Updates to national flood and coastal erosion risk information - GOV.UK		
Environment Agency	Hydrology, flood risk and drainage	FM3 - Flood Risk Analysis: Lime Down C Document Reference(s): Lime Down Solar Park PEIR Chapter 11, Page 20 Issue: Within Lime Down C there is a small ordinary watercourse which runs adjacent to the 132kv substation. The Risk of Flooding from Surface Water mapping shows potential fluvial flood risk associated with this watercourse which extends into the substation area. Impact: Flood risk to sensitive infrastructure could be underestimated or omitted. Solution: Further flood risk analysis needs to be undertaken for the ordinary watercourse which runs near to the 132kv sub-station within Lime Down area C at grid reference: 385550, 182920. This could take the form of a localised hydraulic model so	Yes	The substation remains in this field but has been sequentially relocated north of the area at risk of flooding, informed by updated surface water mapping. The updated location is shown in Environmental Statement (ES) Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]. Further details are provided in ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		that the fluvial flood risk to the substation can be quantified as well as any impacts of land raising within areas of flood risk. This analysis should be clearly evidenced within the final FRA.		
Environment Agency	Hydrology, flood risk and drainage	FM4 - Flood Risk Analysis: Lime Down E2 Document Reference(s): Lime Down Solar Park PEIR Chapter 11, Section 11.7.44 Issue: Solar panel infrastructure is located within Flood Zone 2 and Flood Zone 3 associated with Gabriel's Well (Main River) which runs through the centre of Lime Down E2. It is not clear how the design of solar panel infrastructure and impacts from solar panel infrastructure in the floodplain will be informed in this area. Impact: Flood risk to solar PV panels could be underestimated in Lime Down area E2. There is a potential evidence gap for informing solar panel levels and associated	No	The flood risk associated with Gabriel's Well through Lime Down E2 has been assessed in terms of fluvial and surface water flooding. Where panels are located within proximity to flood zones, these have been assessed accordingly. Further details are provided in Environmental Statement (ES) Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		impacts on flood risk. Solution: The flood risk associated with the Garbiel's Well through Lime Down E2 should be modelled or suitable evidence provided to demonstrate that there is reasonable freeboard available for the Solar PV units above the design flood level.		
Environment Agency	Hydrology, flood risk and drainage	FM5 - Design of new watercourse crossings Document Reference(s): Lime Down Solar Park PEIR Chapter 11, Section 11.9 Issue: New watercourse crossings could be proposed. Impact: Inappropriate design of crossings could lead to increases in flood risk. Solution: Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. Proposed crossings should not increase	No	Any proposed crossings will be designed so that soffit levels sit a minimum of 600 mm above the 1% AEP + climate change flood level. Open-span bridges are preferred over culverts, however the type of crossing selected will be based on site-specific factors and in consultation with the relevant authority. Abutments will be minimal and offset by at least 1 m from the bank top. A water crossing schedule is provided in the Flood Risk Assessment and Drainage Strategy – Covering Report in ES Volume 3, Appendix 11-1 - 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. These commitments are secured through the Cable Route Construction Method

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		flood risk elsewhere. The design flood level for permanent crossings in fluvial scenarios would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For any permanent crossings, the 2080's epoch for climate change should be used. Additional narrative/ explanation We would recommend against culverts for any crossings and would prefer the use of open-span structures such as bridges. Soffit height of the bridge must be a minimum of 600mm above the 1 in 100 AEP plus climate change allowance flood level. All abutments must be set back a minimum 1m from the top of bank and as minimal as possible. Any loss of floodplain due to abutments and ramps will need to be compensated for.		Statement [EN010168/APP/6.3] and the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], which together require construction to be undertaken in accordance with the Flood Risk Assessments and Drainage Strategies as provided in ES Volume 3, Appendix 11-1 - 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		All parapets and railings need to be permeable and open as possible with a minimum 100mm spacing.		
Environment Agency	Hydrology, flood risk and drainage	FM6 - Fluvial Floodplain & Off-Site Impacts Document Reference(s): Lime Down Solar park PEIR Appendix 11.1, Sections 3.3.1 and 3.3.2 Issue: There is no evidence to support the case that the loss of floodplain storage because of the solar panel mounting structures will be negligible. Furthermore, it is apparent that the 132kv substation within Lime Down C may be in an area of flood risk and hence could result in a loss of floodplain storage. Impact: Insufficient evidence to support no loss of floodplain storage and impacts to third parties. Solution: A quantitative assessment of proposed infrastructure within the floodplain	No	A quantitative floodplain storage loss assessment has been undertaken and is presented in Environmental Statement (ES) Volume 3, Appendices 11-1 - 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] . This confirms that infrastructure, including the substation and panels, will not result in a material loss of floodplain volume.

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		should be undertaken to confirm that there would be no off-site impact. Additional narrative/ explanation Where solar panel support frames and other infrastructure falls within areas of fluvial flood risk and specifically the design flood, the impact on flood risk to third parties should be quantified. This could be achieved either by a volumetric approach whereby the volume of flood storage lost up to the design water level is quantified and presented within the FRA. Alternatively, the impact of development within areas of flood risk could be evaluated using hydraulic modelling although it is recognised that this brings associated limitations, particularly when representing narrow features such as solar panel support structures.		
Environment Agency	Hydrology, flood risk and drainage	FM7 - Mannings Open Channel Flow Calculations Document Reference(s): Lime Down Solar Park PEIR	No	Cross sections used to inform Manning's open channel flow calculations are provided as annexes to Environmental Statement (ES) Volume 3, Appendix 11-1: Flood

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Appendix 11.1, Appendix C Issue: We are unable to fully appraise the Mannings open channel flow calculations and resultant levels without sight of the corresponding cross sections. Impact: Insufficient evidence within the FRA to fully appraise the Mannings calculations. The assessment of flood risk to and from the development could be inaccurate. Solution: Provide figures showing the corresponding cross sections for the nodes shown in the tabulated cross sections table.		Risk Assessment and Drainage Strategy [EN010168/APP/6.3].
Environment Agency	Hydrology, flood risk and drainage	Appendix D – Water Resources WR1 - Water Demands of the Scheme Document Reference(s): Lime Down Solar Park PEIR Chapter 3, Section 3.4.12 and 3.4.41-3.4.42 Issue: Water requirements of the Scheme during construction are estimated to be	No	Water consumption and supply requirements during construction and operation is addressed in the Outline Water Resources Strategy [EN010168/APP/7.26]. This includes expected construction-phase demand (e.g. for welfare, dust suppression and drilling water required for HDD) and consideration of operational requirements,

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		4,905m3 for welfare facilities and other uses. It is unclear what the scope of other uses includes. Impact: Whilst activities such as wheel and concrete washing can require relatively small quantities, dust suppression during the summer months and bentonite clay mixing and driving of HDD can require larger volumes of water. If water demands are underestimated ahead of the commencement of the construction phase, then licences may not be in place in time and potential limitations to water access may not have been planned for. Solution: Produce a water resources strategy which breaks down the water demands by activity and location to ensure all have been considered. An options appraisal of the sources of supply available can then provide the most practical solutions, if for example licences come with restrictions		including any relevant to BESS fire protection systems.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Environment Agency	Hydrology, flood risk and drainage	WR2 - Existing Abstraction Licence Document Reference(s): Lime Down Solar Park PEIR Chapter 3, Section 3.4.42 Issue: Sources of supply considered for water resources strategy to the site include the use of an existing abstraction licence. Some activities (such as dust suppression) are considered to be high loss water uses (very little of the water is returned to the environment). If the existing licence conditions do not accurately reflect these uses of water, a formal variation of the licence will be required. Impact: This may impose additional conditions if the abstraction is determined to be made more impactful as a result of these changes. Solution: As part of a water resources strategy, consider the existing licence conditions and implications for formally	No	As stated within the Outline Water Resources Strategy [EN010168/APP/7.26] the possibility of a mains water connection and water tankering for the Scheme has been confirmed and therefore progression of options for borehole water, surface water abstraction and surface water runoff harvesting are not a priority for the Scheme. If abstraction is required, the need for a formal variation of the licence will be identified to ensure continued compliance and security of supply.

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		varying it to ensure that any restrictive conditions can be planned for, and security of supply ensured.		
Environment Agency	Hydrology, flood risk and drainage / Other Environmental Matters (Battery Safety)	Appendix E – Groundwater and Contaminated Land GWCL1 - Battery Energy Storage System Drainage System Document Reference(s): Lime Down Solar Park PEIR Chapter 3, Section 3.3.14 Issue: Foundations of Battery Energy Storage System (BESS) areas could compromise the integrity of lining of the sealed drainage system if piles or ground screws are used. Impact: Potential unacceptable risk to the underlying secondary A aquifer. Solution: Ensure the BESS foundation design does not compromise the integrity of the sealed drainage system. The BESS	No	The detailed foundation design for the BESS units will be confirmed at the detailed design stage. The current proposal includes a lined subgrade beneath the units; however, alternative approaches may also be considered, such as bunded foundations which discharge to a sealed drainage system connected to a containment tank. This system would be designed to be isolated in the event of a fire, allowing surface water runoff and any potential contaminants to be safely captured and controlled. The final drainage design will ensure that the integrity of the sealed system is maintained and that there is no risk to the underlying Secondary A aquifer. The drainage infrastructure will be maintained throughout the operational life of the Scheme to ensure continued effectiveness. These commitments are set out in the

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		must be fully sited on an impermeable base with drainage that can be sealed in the event of fire. Additional narrative/ explanation The local Fire & Rescue Service should be contacted to draw up emergency plans in case of a fire, and to discuss management plans and procedures to ensure contaminant controls are implemented effectively. Reference is made to the National Fire Chiefs Council guidance. We support this but note that the guidance is under review. Please ensure that the current guidance is used. The drainage system should be maintained throughout the operational life of the scheme to ensure it continues to be impermeable. In section 3.2.5, infiltration tests are		Flood Risk Assessment and Drainage Strategy in ES Volume 3, Appendix 11-1 - 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] and are secured by Requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1], which requires approval of the detailed drainage design and long-term management arrangements prior to construction. Construction-phase measures, including pollution prevention and temporary drainage controls, are secured through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. Engagement has already taken place with the local Fire & Rescue Service, and their recommendations have been incorporated into the design approach.

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		proposed to determine suitability of soakaways. In 3.5.2 it states that soakaways are not considered feasible. It is unclear if any infiltration tests have been carried out.		
Environment Agency	Hydrology, flood risk and drainage / Ground Conditions	GWCL2 - Sensitive Receptors Document Reference(s): Lime Down Solar Park PEIR Chapter 11, Tables 11-3 and 11-4 Issue: These tables do not include groundwater receptors. Impact: Risks to a receptor cannot be appropriately determined if measures are not defined. Solution: Ensure all potential receptors are considered at all stages of the process.	Yes (assessment only).	Groundwater receptors, including the underlying Secondary A Aquifer and Source Protection Zones (SPZs), have been incorporated into the updated Environmental Statement. These are considered in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and within ES Volume 3, Appendix 11-6: FRA and Drainage – Lime Down D / BESS [EN010168/APP/6.3]. The risk to these receptors is assessed, and appropriate mitigation measures have been embedded within the design. This addresses the issue raised and ensures that all relevant receptors are appropriately considered. While the issue primarily relates to ground conditions, the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				interface with drainage and aquifer protection has been fully addressed in the updated assessment.
Environment Agency	Hydrology, flood risk and drainage / Other Environmental Matters (Battery Safety)	GWCL3 - Drainage Tanks Document Reference(s): Lime Down Solar Park PEIR Appendix 11-1, Sections 3.8.4 and 3.8.5 Issue: The capacity of the lined drainage area refers to 1 in 10 and 1 in 100 storm events, but not the recommended tank size. Impact: If the volume of the tanks is not included in the design, the drainage system may not have sufficient capacity to hold water in the event of a simultaneous flood and fire event. Solution: Surface water drainage system should be capable of holding both the 1 in 100 event and the full tank capacity added together, plus the addition to allow for climate change.	No	Please refer to Environmental Statement (ES) Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D [EN010168/APP/6.3], which demonstrates how firewater would be contained using a sealed system with a lined gravel sub-base and self-actuating valves to isolate outfalls in the event of a fire or spill. The system is designed to accommodate the 1 in 10 year rainfall event plus climate change allowance, together with a reasonable worst-case firewater/suppression volume. Further details will be confirmed at detailed design stage. These commitments are secured through the Draft Development Consent Order (DCO) [EN010168/APP/3.1], which requires approval of the detailed drainage design and management arrangements prior to construction. Disposal of attenuated water will follow

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Additional narrative/ explanation Note that the size of firewater tank specified is needed for each BESS site, if there is more than one site. An appropriate methodology to dispose of attenuated water (Section 3.8.6) will need to be agreed with EA prior to release. You may need an environmental permit if you discharge liquid effluent or wastewater.		Environment Agency (EA) guidance, and permitting requirements will be discussed with the EA as the strategy is developed.
Environment Agency	Hydrology, flood risk and drainage	GWCL4 – Water Framework Directive (WFD) Groundwater Bodies Document Reference(s): Lime Down Solar Park PEIR Appendix 11-1, Annex A-H Issue: The site details for each area in Annex A-H do not include WFD groundwater bodies in the lists of WFD bodies. WFD groundwater bodies are not discussed elsewhere in the PEIR. Impact: Potential risk that WFD	Yes	Water Framework Directive (WFD) groundwater bodies have been included within the Water Framework Directive Assessment [EN010168/APP/7.11] which concludes that with the implementation of measures identified in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] , no significant adverse effects on any WFD bodies are expected.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		groundwater bodies could be overlooked. Solution: Ensure WFD groundwater bodies are included in the WFD assessment.		
Environment Agency	Hydrology, flood risk and drainage	GWCL5 - Annex D – Lime Down Solar C1 Document Reference(s): Lime Down Solar Park PEIR Appendix 11-1, Annex D - Lime Down Solar C1 Issue: ‘Annex D – Lime Down Solar C1’ is listed in the contents but has not been supplied. Impact: Without sight of ‘Annex D – Lime Down Solar C1’ we are unable to review or comment on it. This covers part of the site not included in other reports in this appendix. Solution: Supply ‘Annex D – Lime Down Solar C1’. Additional narrative/ explanation	No	There appears to have been a referencing inconsistency within the Preliminary Environment Information Report (PEIR) documentation. The references to “Annex D” were intended to refer to “Appendix D – Lime Down Solar C1”, which was appended to Annex F. This has been updated in the version submitted as part of Environmental Statement (ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Covering Report [EN010168/APP/6.3] and ES Volume 3, Appendix 11-4: Flood Risk Assessment and Drainage Strategy - Lime Down C1 [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		There is reference to 'Annex D' in Annex B 2.3.11, Annex C 2.3.10, Annex E 2.3.6, Annex F 2.3.12, and Annex F 3.4.1. It is unclear if these are referring to the same annex. None of the annexes listed have a separate Annex D. It is possible that Annex F 3.4.1 is meant to read "Appendix D", which is appended to that annex, but it is unclear.		
Environment Agency	Hydrology, flood risk and drainage / Ground Conditions	GWCL6 - Aquifer Designation Document Reference(s): Lime Down Solar Park PEIR Appendix 11-1, Annex E Issue: A very small area of the Forest Marble Formation Limestone, Ooidal in the west of this site is principal aquifer, not secondary A as stated. Impact: Principal aquifers are highly sensitive receptors. Failure to identify the correct aquifer designation could lead to	No	Reference to secondary A aquifer has been amended to principal aquifer in Environmental Statement (ES) Volume 3, Appendix 11-2: Flood Risk Assessment and Drainage Strategy - Lime Down A [EN010168/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		insufficient mitigation measures. Solution: Ensure correct aquifer designations are mapped and considered when identifying impacts and planning mitigation.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL7 - Intrusive Ground Investigation Document Reference(s): Lime Down Solar Park PEIR Chapter 19, Section 19.10.2 and Appendices 19-1 to 19-17 Issue: Investigation for land and groundwater contamination is not included in the scope of the pre-ES intrusive ground investigation and is instead deferred to the Discovery and Inspection Strategy. Impact: Risk of an unsuitable ground investigation prior to construction. Identifying unexpected contamination during construction and employing the Discovery and Inspection Strategy is likely to cause significant delays to construction	Yes	As stated within Environmental Statement (ES) Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] no significant sources of contamination are expected, therefore it is considered that employing a 'Discovery and Inspection Strategy' is appropriate to ensure that where unexpected contamination is identified, it can be quickly dealt with without risk to receptors. Please refer to the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] for further details. Intrusive ground investigation will be completed prior to the commencement of construction. This investigation will target areas where Horizontal Directional Drilling (HDD) is to be applied and areas where

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		works. Solution: The scope of the pre-ES intrusive ground investigation should include land and groundwater contamination assessment. This should include targeting areas of potential concern, as identified and recommended in the desk studies. Target potential sources of contamination across all sites, along with other locations to determine background conditions. Additional narrative/ explanation All the desk studies include a recommendation to confirm the conceptual site models with a suitable ground investigation prior to the construction phase. The Conceptual Site Models (CSMs) identified some potentially active source-pathway-receptor linkages which should be investigated. It would undermine the desk studies to ignore these.		elevated risks are associated with ground conditions, i.e. areas associated with underground mine workings.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Shallow groundwater is likely, and it could affect construction and design. The ground investigation phase could also be used for infiltration testing and groundwater monitoring. The depth to various subsurface bedrock strata should be confirmed at proposed HDD or other deeper boring locations, as it may mean the route passes through principal aquifers and confined SPZs. If so, then we expect very strict controls, and these will need to be detailed in all relevant construction-phase management plans. Foundations of panel arrays will also be determined by ground conditions, so the geotechnical investigation will need to also cover these areas.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL8 - Scope of desk studies Document Reference(s): Lime Down Solar Park PEIR Appendices 19-1 to 19-17	Yes	A site walkover has been carried out in Environmental Statement (ES) Volume 3, Appendix 19-1 to 19-15 [EN010168/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Issue: No site walkovers carried out when compiling the desk study reports. Impact: Visual evidence of contamination and contamination sources may be missed. Solution: Complete a walkover of each site and update reports accordingly.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL9 - Data Searches Document Reference(s): Lime Down Solar Park PEIR Appendices 19-1, 19-2 and 19-5 Issue: Maps and data searches appended to appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites. Impact: We consider that the Applicant cannot rely on desk study data if it has been taken from the reports in these appendices. The reports, maps, and distances given therein, aren't specific to the areas discussed. Solution: Provide an explanation for why the existing data searches were used for	No	The desk studies presented in Environmental Statement (ES) Volume 3, Appendices 19-1 to 19-8 [EN010168/APP/6.3] are appropriate to the boundaries of the Scheme and provide a suitable buffer to the Scheme boundary. There may be some overlap of the data reports relevant to each part of the Scheme, but the Applicant is confident that all parts of the Scheme have been appropriately assessed and relevant data has been reviewed for all documents.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		these three sites. Provide reassurance that the whole area of each site and a minimum 250m radius beyond has been included in the study, and supply supporting evidence. Alternatively, resubmit the relevant reports with annexes that are reflective of the site under discussion only, to be consistent with the other desk studies supplied in Volume 3, Appendix 19. Additional narrative/ explanation The data searches cover various parts of the whole solar development, not specifically the subject sites. For example, Appendix 19-1 (for Lime Down A), Annex19-1-1 has incomplete mapping for the LD A site, but includes parts of LD B, D and E (Slices C to G in order). Annex 19-1-2 is desk study information for the same parts of LD A, B, D and E. As the data searches aren't for specific sites, the features and distances from site quoted aren't necessarily applicable to those sites.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		The same data searches and maps are supplied for all three appendices, but the order of documents in the annexes varies. This makes it difficult for us to review and assess the data presented. The historical map sections supplied do not give a whole coverage of each map site. It is not clear, and we have seen no explanation, why the desk studies presented as appendices 19-1, 19-2 and 19-5 have been completed using Envirocheck reports previously produced by Delta Simons. A new Groundsure report has been procured for all other sites, and each one is specific to the site under consideration. This inconsistent approach may lead to differences in the quality and reliability of the information produced. Appendices 19-2 and 19-5 both contain an Annex 19-1-1 and 19-1-2. Based on the numbering system used in the other appendices, these should be annexes 19-2-1, 19-2-2, and 19-5-1 and 19-5-2.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Appendices 19-1, 19-2 and 19-5 have the same maps and data searches in annexes 19-1-1 and 19-1-2, but in differing orders.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL10 - Railway Lines Document Reference(s): Lime Down Solar Park PEIR Appendices 19-3, 19-4, 19-5, 19-8, 19-9, 19-14, and 19-17 Issue: The railway, which bounds and bisects the site and is immediately adjacent to one of the BESS sites, has not been considered as a potential contamination source in the CSM in these appendices. Impact: Numerous contaminants of potential concern are associated with railway lines. Excavations near to railways, and new cable routes, could open contamination migration pathways polluting groundwater. Solution: Review all CSMs and determine if the railway lines need to be considered.	No	Environmental Statement (ES) Volume 3, Appendix 19-3, Appendix 19-4, Appendix 19-5, Appendix 19-8, Appendix 19-9, Appendix 19-14 and Appendix 19-17 [EN010168/APP/6.3] has been updated to include the railway.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Update the risk assessments as necessary. Additional narrative/ explanation In Appendix 19-17 (corridor southwest), the railway is within the site boundary. In all other cases, the railway is immediately adjacent to a boundary. While the railway is in the CSM for Cable Link E-Rail, this is not carried forward into the main report. In Chapter 19, Section 19.8.31 (contaminated land history for Cable Link E-Rail), the railway within the site is not mentioned. The Groundsure report for CL1 shows a Railway Building on the site (1949). This is not mentioned in site history (1.1.7, Table 3) or discussed elsewhere, albeit we note that it is not shown on historical maps for the location. As no site walkovers were undertaken, visual evidence for contamination has not		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		been noted so cannot be ruled out. The dissolved Department of the Environment published a series of industry profiles, including one for Railway Land. This guidance was archived in 2014; however, we consider it still contains useful reference information.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL11 - Works at Depth Document Reference(s): Lime Down Solar Park PEIR Appendices 19-1 to 19-17 Issue: Omission to consider the potential for works occurring at depth to open new contamination pathways through cohesive shallow soils into the underlying principal aquifers and confined SPZs. Impact: Failure to consider soils at depth, especially where aquifers are of greater sensitivity, or SPZs are confined, may result in unacceptable risk to sensitive receptors.	No	No discrete sources of contamination were identified in the areas around railway cuttings (beyond the railway cuttings themselves, which would not be in contact with any cable bores advanced via trenchless techniques. Any unidentified contamination present will be addressed via a Discovery & Inspection Strategy secured via the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. The Outline CEMP [EN010168/APP/7.12] also requires that specific deployments of Trenchless techniques require risk assessment prior to

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Solution: Review all proposed deeper cable routes and consider the anticipated geology at depth. Assess whether alternative routes may be appropriate, or if a hydrogeological risk assessment will be necessary. Where boring through principal aquifer and SPZ1 or SPZ2 is likely, strict controls must be in place to prevent fluid breakout and opening migration pathways for contaminants at surface. Greater measures should be employed to assess for the presence of potential contamination where deep boring is proposed. Additional narrative/ explanation Appendix 19-12, Section 1.1.23 states, "The deeper confined aquifers are not considered to be a receptor owing to the shallow burial of the cable." Principal aquifer is exposed in the base of the railway cutting in the west of Lime Down C. This cutting is estimated to be up to 17m deep (Appendix 19-11, 1.1.4, Table 2). Based on		deployment, in line with best practice and task method statements. Where risks to sensitive groundwater receptors are identified through the application of the Outline CEMP [EN010168/APP/7.12], suitable mitigations to ensure the protection of those receptors (up to and including changes to techniques applied in cabling) will be deployed to ensure that receptors are protected. A method statement will be provided to demonstrate how groundwater will be protected where necessary.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		this, it can be assumed that any excavation or boring beneath the railway line might be through principal aquifer. This may also be within the confined SPZ. In Appendix 19-17, Table 7, Linkage Reference S3-P3-R3, there is an assumption that mudstone beneath the Site will act as impermeable barrier to groundwater migration. Mudstone is not present across the whole site. Part of the site is immediately underlain by principal aquifer. Infiltration rates through the mudstone have not been assessed as part of this study, so it being impermeable is an assumption. Thickness of the mudstone has not been assessed. Excavations to create drainage systems for the BESS and elsewhere may expose permeable soils at depth.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL12 - Topography and Subsurface Conditions Document Reference(s): Lime Down Solar	No	Further consideration of local groundwater flow is provided in Environmental Statement (ES) Volume 3, Appendix 19-1 to 19-8 [EN010168/APP/6.3] . Topography

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Park PEIR Appendix 19-1 Section 1.1.25; Appendix 19-2 Section 1.1.26; Appendix 19-3 Section 1.1.29 Issue: Statements regarding relative positions of sources based on topography are not wholly correct. Using topography to determine subsurface conditions and groundwater flow is not sufficient in isolation. Impact: Potential inference of regional groundwater flow without any supporting evidence or discussion. Solution: Review models made with a reliance on topography and ensure that statements are correct. Revise CSMs as necessary. Additional narrative/ explanation The CSM preambles in these appendices state that off-site sources are all down		has been considered and recorded in walkovers. Assumptions regarding groundwater flow have not been made purely in relation to topography. However, with the exception of Trenchless techniques for cable installation, any impacts from existing contamination or operational impacts will be at surface and given the presence of cohesive, i.e. low permeability, soils across the site, topography will likely play a role in determining impact to receptors and regional-scale groundwater bodies will only be at risk where significant excavations are required. Ground investigation and monitoring of well installations, if required, will provide confirmation of groundwater flow characteristics at a depth appropriate to the Scheme at a given location. Mitigations including changes to excavation techniques and micro-siting of cabling can be employed to minimise construction phase risks. A requirement for additional ground investigation has been secured via the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		topographical gradient from the Site and therefore there is no credible source-pathway-receptor linkage excluding potential ground gas. The receptor listed in 19-2 Section 1.1.26 appears to be up topographical gradient of LD B. One of the quarries referred to in 19-3 Section 1.1.29 is up topographical gradient. No discussion of likely regional groundwater flow direction in any desk study, except for Appendix 19-13, has been made. Topography cannot conclusively be used to assume this. It may be valuable to obtain or determine a regional groundwater flow model, to better support claims made in the report. Source Protection Zone locations and shapes can be a good indicator of regional conditions. In Appendix 19-16, Section 1.1.28, Table 7, linkage references S1-P3-R5, S2-P3-R4, S2-P3-R5, S3-P3-R4 and S3-P3-R5 mention abstraction boreholes (R5) being		Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		up topographical gradient of potential sources. Water will be abstracted from depth so surface topography is not wholly relevant. The presence and shape of SPZs is indicative of anticipated regional flow direction, which should be assumed to be toward the boreholes. We are satisfied that source S4 is outside all SPZs and down gradient of the abstraction.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL13 - Townleaze Farm Document Reference(s): Lime Down Solar Park PEIR Appendix 19-8, Section 1.1.32 Issue: Sufficient information to justify discounting source S5 Townleaze Farm has not been presented. Impact: Potential for migration of contaminants. Solution: Source should be appropriately considered. Monitor for existing contamination and avoid creating new	Yes	There is no evidence that Townleaze farm represents a contamination risk in the context of the Scheme. It is located outside of the scheme boundary, adjacent to an area planned for solar arrays (so no excavations) and approximately 200m from any area where HDD may be required. Any contaminant impact which is encountered during the construction phase will be addressed via the Discovery & Inspection Strategy, which is secured via the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		migration pathways. Additional narrative/ explanation Section 1.1.32 assumes that the watercourse is permanently free flowing, does not flood, and is not in continuity with groundwater. This river has a “high” risk of flooding from groundwater (Section 1.1.11 Table 4), suggesting there is connectivity. There is alluvium (superficial secondary A aquifer) in this area, which is likely to be permeable. If existing contamination is present, the proposed works may cause this to spread laterally or vertically to sensitive receptors. It would be beneficial to target this area as part of the wider intrusive geo-environmental investigations proposed. Groundwater and surface water sampling could be carried out to assess for existing contamination.		This area will be included in future ground investigations secured within the Outline CEMP [EN010168/APP/7.12].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL14 - Source and Receptor Omissions Document Reference(s): Lime Down Solar Park PEIR Appendices 19-9 and 19-11 to 19-17 Issue: Omission to consider all sources and receptors in the site characterisation and CSMs. Impact: Important pathways which may be active might be missed. Solution: Review all desk studies and source information to ensure all sources and receptors are considered. Update and re-issue as necessary. Additional narrative/ explanation List of site characterisations and CSMs missing sensitive receptors: • 19-7, 1.1.26: confusion over presence, location and reference number of 'manure	Yes	The desk studies have been reviewed and the assessments are regarded as appropriate for the Scheme. Receptors identified in the consultee response have been added where appropriate.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		heap’. • 19-9, 1.1.11, Table 4, CSM and 1.1.57: states no SPZ is present, but this site is wholly underlain by SPZ1c. This is clearly identified in Section 5.10 of the Groundsure report (file page 165). • 19-11, 1.1.10, Table 4: does not mention the principal aquifer exposed at surface in the railway cutting. This is clearly shown in the Groundsure report, Section 5.2, ID 1 and 2. Principal aquifer in west of cutting is indicative that highly sensitive geology is not far below the surface. • 19-12, 1.1.21, R4 receptor: the aquifer and SPZ should also be listed as receptors. • 19-12, 1.1.27, Table 6: we expect to see groundwater and surface water as a receptor for S1, S3 and S4. • 19-13 AND 19-14, 1.1.11, Table 4: both SPZ2 and SPZ2c underly parts of the site but only the SPZ2c is noted. This is an important distinction, as the site is underlain by unconfined SPZ2. The Groundsure report does not show the unconfined SPZ2, but it is visible on Magic Map, which is cited		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		as a source of information. • 19-13, 1.1.23: we consider that off-site sources should include Hullavington liquid sludge tip (7m SE, 1933, which is in the contamination summary 1.1.49, and indicated as on site in Groundsure, 3.2, ID1); and the WWTW 50m NE. This is especially pertinent due to a high groundwater flooding risk in the area. • 19-13, 1.1.23, Receptor R4: this should include SPZ2c and SPZ3. • 19-15, 1.1.22, Source S2: we would expect this to acknowledge actual pollution incidents which have been recorded on site. • 19-16, 1.1.28: some justifications for R4 refer to SPZ1, which is R5. Pathway S4-P3-R5 states “given the distance from site”, but this source is on site, so the justification does not appear to follow. • 19-16, 1.1.46: we would expect the SPZ to be mentioned in the summary of risks to aquifers. • 19-17, 1.1.7: an off-site unspecified depot is not recorded. This feature is mentioned in the Groundsure report and seen on maps		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		adjacent to Monks Mine, from 1970-1979 to present. The depot is given passing reference in Section 1.1.22 but is not mentioned anywhere else in the main report, including in the CSM. The depot could be a source of contamination. • 19-17, 1.1.13, Table 4 and 1.1.45: the SPZ1 and 2 are mentioned, but for completeness the SPZ3 in this region should be noted too. It is not shown in Groundsure Section 5.9, but it is visible on Magic Map. A large section of this site is also within a Drinking Water Groundwater Safeguard Zone, which has not been acknowledged. This designation is not in the Groundsure report but can be seen on Magic Map, which has been referenced as a source. • 19-17, 1.1.25: this refers to an off-site sewage works (source S4), but there is an on-site sewage works which needs to be considered here too.		
Environment Agency	Soils and agriculture	GWCL15 - Public Water Supply Boreholes	No	The Applicant confirms that "PWS" in the Preliminary Environmental Information Report (PEIR) referred to private water

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	(Ground Conditions)	Document Reference(s): Lime Down Solar Park PEIR Appendix 19-17, Section 1.1.29 Issue: Omission to consider two nearby public water supply boreholes associated with SPZ1. Impact: Potential to cause unacceptable harm to sensitive receptor. Solution: Review CSM and consider the public water supply boreholes. Determine if further mitigation is required. Additional narrative/ explanation It has been assumed that 'PWS' refers to Public Water Supply; however, it has not been defined in the PEIR glossary. 'PWS' is also not defined in desk studies where it is also referred to.		supplies. Potential risks to public water supply boreholes have been assessed separately through consideration of their associated Source Protection Zone 1 (SPZ1). This is reported in Environmental Statement (ES) Volume 1 Chapter 19: Ground Conditions [EN010168/APP/6.1], with embedded mitigation including sealed drainage systems around BESS and substations as set out in the Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3], and construction-phase controls in the Outline Construction Environmental Management Plan (CEMP)[EN010168/APP/7.12]. The Conceptual Site Model identifies groundwater within the SPZ1 as a sensitive receptor, and with the embedded mitigation in place the assessment concludes that there is no significant risk of contamination to public water supply boreholes.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL16 - Inconsistencies with CSMs Document Reference(s): Lime Down Solar Park PEIR Chapter 19, Section 19.8.57, Table 19-1 Issue: The information presented is not consistent with all results of all CSMs in all desk studies. Impact: If this summary is not representative of information within the desk studies, the incorrect risk factors could be used when assessing impacts. This could lead to insufficient protection for sensitive receptors, and insufficient controls in place during works. Solution: Review the results of all CSMs and revise Table 19-1 accordingly, or ensure the correct information is carried forward into the ES and other subsequent reports. Additional narrative/ explanation	No	Table 19-1 within Environmental Statement (ES) Volume 1 Chapter 19: Ground Conditions [EN010168/APP/6.1] has been reviewed and is consistent with CSMs in the desk studies. The applicant believes all risks have been appropriately assessed.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Given the variety of sources and receptors considered in the seventeen CSM tables presented in the appendices, the summary given in Chapter 19, Section 19.8.57, Table 19-1 is not a sufficient summary of all matters considered.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL17 - Receptor Sensitivity Classification Document Reference(s): Lime Down Solar Park PEIR Chapter 19, Section 19.11.7, Table 19-2 Issue: The receptors presented in Table 19-2 are different to those in Section 19.8.57, Table 19-1, but the subject matter appears to be the same. Impact Use of incorrect sensitivity could mean risks are not given sufficient consideration. Solution: Review Section 19.11.7, Table 19-2. Provide further explanation and discussion. Ensure terminology and risk	No	Table 19-2 within Environmental Statement (ES) Volume 1 Chapter 19: Ground Conditions [EN010168/APP/6.1] has been reviewed and is consistent with CSMs in the desk studies. The applicant believes all receptor sensitivities have been appropriately assessed. Tables relating to all phases have now been considered and where required, have been included in the chapter.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		ratings are consistent between all reports. Additional narrative/ explanation In Appendix 19-18, Section 2.1.24, Table 4, SPZ1 and principal aquifer are given a “Very High” sensitivity. As there is no granularity of receptor type in, Chapter 19, Section 19.11.7, Table 19-2, all water receptors should be “Very High” sensitivity, not “High” as this is the worst case within the DCO boundary. This table appears to relate to the construction phase, but there is no equivalent table for operation and decommissioning. For a complete assessment, it would be useful to consider these matters for all phases.		
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL18 - Contamination Document Reference(s): Lime Down Solar Park PEIR Chapter 19, Section 19.11.10 and 19.11.13	Yes	As stated within Environmental Statement (ES) Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] no significant sources of contamination are expected. As detailed in the Outline Construction Environmental

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Issue: Assumption that any contaminant impacted soils encountered during construction will have been removed as part of the mitigation required for the Construction Phase, so would not be an impact to Operation and Maintenance Phase repair work. Impact: Assuming that no contamination will be encountered during operation, maintenance or decommissioning will mean that no measures are in place in case suspected contamination is later identified. This could result in unacceptable risk to groundwater. Solution: A discovery strategy should be included in any operation, maintenance and decommissioning plans. Care should be taken in SPZs 1 and 2, and around the BESS and substation. We expect this to be detailed in the Outline Operational Environmental Management Plan and Outline Decommissioning Strategy.		Management Plan (CEMP) [EN010168/APP/7.12] a 'Discovery and Inspection Strategy' will be developed to ensure that where unexpected contamination is identified, it can be quickly dealt with without risk to receptors.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Additional narrative/ explanation This assumption does not allow for any previously unknown contamination encountered during operation, maintenance and decommissioning. Excavations may take place in areas not disturbed during construction, such as if re-routing of cables is required. Any contamination in these locations will not have been removed. There is a potential for new contamination, that is not present at the time of construction, to later impact the site. For example, a pollution incident within or in influencing distance of the site (not necessarily directly associated with the proposed development). Existing contamination may migrate over time into the works area. Creation of new migration pathways as part of the works (such as along buried cable routes) could contribute to this.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Environment Agency	Other Environmental Matters (MADS)	GWCL19 - Controlled Waters as a Receptor to Fire Document Reference(s): Lime Down Solar Park PEIR Chapter 20, 20.7.22, Table 20-8 and 20.7.26 Issue Table 20-8, Fires and Explosions and Damage/Cut off of utilities does not specifically mention controlled waters as a receptor. Impact: Failure to recognise controlled waters as a receptor may mean they are overlooked, and insufficient mitigation is put in place. Solution: Ensure mitigation for controlled waters is specifically included in relevant management plans and associated documents.	No	The Applicant notes this comment and has added controlled waters as a receptor within Environmental Statement (ES) Volume 1 Chapter 20: Other Environmental Matters [EN010168/APP/6.1]. Mitigation relevant to controlled waters is secured through the Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3], which requires sealed drainage systems, lined sub-bases and shut-off valves around BESS and substation areas; the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], which sets out construction-phase pollution prevention measures; and the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21], which includes provision for containment of firefighting water. These measures are secured by Requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1], ensuring that detailed drainage and management plans

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				are submitted and approved prior to construction.
Environment Agency	Soils and agriculture (Ground Conditions)	GWCL20 - Heat as a Groundwater Pollutant Document Reference(s): Lime Down Solar Park PEIR Chapters 11 and 19 Issue: Heat is a groundwater pollutant and is not mentioned in the PEIR. Impact: Underground cables, such as the 400kV grid connection cables, generate heat that dissipates naturally to the surrounding ground during power transmission. The levels of heat loss and dissipation will be dependent on numerous factors including cable design, soil structure, transmission voltage and engineering design. Where underground cables interact with groundwater bodies this could result in local degradation of groundwater quality via the generation of a heat plume.	No	Heat as a pollutant only exists as a potential future contaminant. Any cables selected to be used will be appropriate to the ground conditions at the given location at which they are installed. Therefore, mitigation against this pollutant is embedded. This is now reflected in Environmental Statement (ES) Chapter 19: Ground Conditions [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Solution: This potential impact should be assessed further when the ground conditions and the thermal characteristics of the cables to be installed are better understood. Additional narrative/ explanation Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651: ““pollutant”, in relation to England, means any— a. substance, b. heat, or c. biological entity or micro-organism, which is liable to cause pollution;” We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and cooling systems but there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables. The Environment Agency's Chief Scientist's Group has published a report for Ground Source Heating and Cooling (GSHC) systems (Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems). In this study, a 'thermal plume' was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an equivalent benchmark could be considered when assessing heat pollution from underground HV cables. The Chief Scientist's Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		indirect (e.g. changes in water chemistry) means. At this stage we require the potential thermal implications of buried cables, in relation to risks to groundwater, to be considered further via desk-based assessment.		
Environment Agency	Hydrology, flood risk and drainage / Soils and agriculture (Ground Conditions)	Appendix F – Informative Comments and Advice to the Applicant Consents Strategy A number of permits and licenses may be required to facilitate this scheme. Should you wish to disapply any element of these proposals and bring within the scope of the Development Consent Order (DCO) details of this should be provided to the Environment Agency a minimum of 6 months prior to DCO submission. We will require a consenting strategy document to be submitted in support of the proposals which outlines a programme of managing the various consents and	No	The Applicant acknowledges this advice and has held ongoing discussions with the Environment Agency (EA) and other relevant consultees regarding permitting requirements. At the point of Development Consent Order (DCO) submission, the only disapplication being sought is for Flood Risk Activity Permits (FRAPs), to enable specific watercourse crossings and drainage outfalls to be authorised through the DCO rather than separate permitting. This approach has been discussed with the EA and is formalised in the Consents and Permits Strategy [EN010168/APP/7.26] submitted with the Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		permits, and confirmation of whether this will be subsumed within the DCO process or as standalone permits. We recommend early engagement with our National Permitting Service (NPS) and full use of their enhanced pre-application advice service to ensure the permitting requirements and implications are fully understood and addressed in good time to inform the Planning Inspectorate (PINS) decision making process. Twin tracking is recommended for those applications considered fundamental to the DCO.		All other permits and licences (e.g. Environmental Permits for emissions, discharge consents, waste permits) will be applied for separately in accordance with relevant legislation and guidance. Engagement is ongoing with the EA's National Permitting Service to confirm the details of disapplication and any standalone applications. Where necessary, twin-tracking of permits will be used to avoid risk to the overall programme. This approach ensures that disapplication is clearly limited to FRAPs only, with all other permits to be obtained as required, and is consistent with statutory requirements.
Environment Agency	Hydrology, flood risk and drainage	Flood Risk Activity Permit (FRAP) The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:	No	The Applicant acknowledges this guidance and confirms that where proposed works fall within the thresholds set out under the Environmental Permitting (England and Wales) Regulations 2016, the need for a

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • on the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environmentagency.gov.uk		Flood Risk Activity Permit (FRAP) will be assessed in consultation with the Environment Agency (EA). Embedded mitigation has been incorporated into the drainage and design strategy to minimise the potential for works within FRAP-triggering zones. These measures are detailed in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. Where relevant, any remaining activities will be clearly identified and either addressed through standalone permit applications or, where appropriate, included in the ongoing discussions around disapplication. These discussions are progressing with general consensus between the Applicant and consultees. This approach is documented in the Consents and Permits Strategy [EN010168/APP/7.26] to ensure consistency with the Development Consent

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Order (DCO) submission and to manage consenting risk effectively.
Environment Agency	Hydrology, flood risk and drainage	Abstraction and Impoundment The proposals may require Water Resource Licences in respect of the construction activities required. Advice on regulated activities and licence requirements is given below. Water Resource (Impoundment and Abstraction) Licences are issued by the Environment Agency under the terms of the Water Resources Act 1991 and the provisions of the Water Resources (Abstraction and Impounding) Regulations 2006. No other Environment Agency administered Regulatory Regime provides consent to create or modify an impoundment and / or abstracted water at volumes greater than 20m³/day. You should seek to fully understand the permissions required for your proposal and not assume consent for abstraction and	No	The Applicant notes this guidance. The need for any Water Resource (Impoundment and Abstraction) Licences will be reviewed during the detailed design, with applications made if needed in advance of construction. This is entirely standard and there is no reason to expect that such licences would not be granted, subject to normal Environment Agency processes. This position is also captured within the Consents and Agreements Position Statement [EN010168/APP/7.7], which sets out how permitting requirements, including abstraction and impoundment licences, will be managed alongside the Development Consent Order (DCO).

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		impoundment activity is provided by other regulatory documents.		
Environment Agency	Hydrology, flood risk and drainage	Dewatering, Abstraction and Discharges If dewatering is required, you may require an abstraction licence if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk) If you do not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk) Please note that the typical timescale to process a licence application is 9-12	No	The Applicant acknowledges this guidance. Based on the construction methodologies proposed, no impounding structures are anticipated as part of the Scheme. Temporary works, such as isolation dams for open cut installations, are designed to maintain flow via overpumping and do not retain or back up water, as set out in Environmental Statement (ES) Volume 3, Appendix 3-2: Cable Route Construction Method Statement [EN010168/APP/6.3]. As such, the activities are not considered to meet the threshold for an impoundment permit. This interpretation is supported by current Environment Agency (EA) guidance; however, the final determination rests with the EA. The Applicant is engaging proactively with the Environment Agency and Wiltshire Council to confirm this position, and is seeking to address any residual concerns

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		months. You may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning. Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water. Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater. You may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: https://www.gov.uk/guidance/discharges-to-		through inclusion of key methodologies in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and, where appropriate, through protective provisions. There is general consensus on this approach, and relevant content has been extracted from the internal method statement to ensure clarity for regulators.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		surface-water-and-groundwater-environmental-permits The use of drilling muds for any necessary directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended. It is worth considering the likely infrastructure required to meet any potential discharge permit requirements to ensure that there is sufficient space within the Order Limits. For example, infrastructure required to treat any contaminated groundwater which may need to be discharged to surface waters. Insufficient space is a common constraint which can result in permit non-compliance, non-permitted discharges or expensive/complex treatment methods.		
Environment Agency	Hydrology, flood risk and drainage	Impounding Licence Requirement If you intend to impound a watercourse then you are likely to need an impounding	No	The Applicant acknowledges this guidance and confirms that no impounding structures, such as dams or weirs, are proposed as part of the Scheme. Temporary works

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		licence from the Environment Agency. An impoundment is any dam, weir or other structure that can raise the water level of a water body above its natural level. 'On-line' impoundments hold back water in rivers, stream, wetlands and estuaries, and consequently affect downstream flows, sediment transport and migration of fish. Impoundments could be created through works to modify or change existing watercourses. An Impoundment Licence could also be required if you amend, modify or remove existing in channel structures. More information is available on gov.uk: https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence		associated with watercourse crossings (e.g. isolation dams for open trenching) are designed to maintain flow using overpumping and do not raise water levels above their natural state. This approach is set out in Environmental Statement (ES) Volume 3, Appendix 3-2: Cable Route Construction Method Statement [EN010168/APP/6.3], and has been discussed with the Environment Agency (EA) as part of ongoing engagement on permit disapplication. Based on current guidance, the works do not fall within the definition of an impoundment, but this will be reviewed further with the EA as required. To provide assurance, key methodologies are being incorporated into the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and protective provisions. There is general consensus on this approach, and the Applicant will

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				continue to engage with the EA to confirm that the proposed construction activities do not require an impoundment licence.
Environment Agency	Hydrology, flood risk and drainage	Discharge of Trade Effluent Effluent discharged from any premises carrying on a trade or industry and effluent generated by a commercial enterprise where the effluent is different to that which would arise from domestic activities in a normal home is described as trade effluent. If you are not able to discharge effluent, it will be classed as waste, and you must then comply with your duty of care responsibilities. If you wish to discharge effluent, after appropriately treating it, to groundwater or surface water a permit under the Environmental Permit Regulations will be required. Full characterisation of the effluent will be required, and modelling may be required at the planning stage to determine the impact of the effluent on the receiving watercourse.	No	The Applicant acknowledges this guidance. At present, no discharges of trade effluent are proposed. However, should any arise as the design is developed, the need for an Environmental Permit or trade effluent consent will be assessed in consultation with the Environment Agency and the relevant sewerage undertaker. If any trade effluent discharge is proposed to surface water or groundwater, full characterisation and impact assessment, including modelling where required, will be undertaken to inform permitting. Where discharges to sewer are proposed, appropriate agreements will be secured prior to discharge, in accordance with the Environmental Permitting Regulations and Water Industry Act. All relevant requirements will be addressed

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		A trade effluent consent or a trade effluent agreement with your water and sewerage company must be obtained before you discharge trade effluent to a public foul sewer or a private sewer that connects to a public foul sewer. Further guidance is available at: https://www.gov.uk/guidance/pollution-prevention-for-businesses		through the Scheme's permitting strategy and detailed design.
Environment Agency	Hydrology, flood risk and drainage	Water Quality Permit Requirements You do not require a permit if you are only discharging uncontaminated surface runoff. If you intend to discharge to surface water for dewatering purposes, this may be covered by a Regulatory Position Statement (RPS) for water discharge activities. If you can comply with all the conditions within the RPS, then a permit is not required for this activity. Please find the RPS conditions here: https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water	No	The Applicant acknowledges this guidance. Any proposed discharges to surface water, including those associated with temporary dewatering during construction, will be reviewed against the relevant Regulatory Position Statements (e.g. RPS 261). Where activities cannot fully comply with the RPS conditions, the need for a bespoke water discharge permit will be assessed and discussed with the Environment Agency. This is standard practice and will form part of the ongoing permitting strategy and construction planning for the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		If any discharges do not fully comply with the RPS, then a bespoke discharge permit will be required. Please find guidance on applying for a bespoke water discharge permit here: https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits		
Environment Agency	Other Environmental Matters (Waste)	Waste On-Site Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of	No	If required, a Materials Management Plan (MMP) would be developed under the CL:AIRE Definition of Waste: Development Industry Code of Practice by the appointed construction Contractor to support the reuse of excavated materials, minimise off-site disposal; and to demonstrate the necessary lines of evidence to support the proper reuse/offsite disposal of materials and ensure compliance with regulatory guidance. An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects and submitted as part of the Development Consent Order (DCO).

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to our: • Position statement on the Definition of Waste: Development Industry Code of Practice and; • website at https://www.gov.uk/government/organisations/environment-agency for further guidance		
Environment Agency	Other Environmental Matters (Waste)	Waste to be Taken Off-Site Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes: • Duty of Care Regulations 1991 • Hazardous Waste (England and Wales)	No	An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects (duty of care, hazardous waste, permitting) and submitted as part of the Development Consent Order (DCO) Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2010 • The Waste (England and Wales) Regulations 2011 Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		www.gov.uk/government/organisations/environment-agency for more information.		
Environment Agency	Other Environmental Matters (Waste)	Movement of Waste Off-Site The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes. The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales. The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here: https://www.gov.uk/uploads/system/uploads/attachment_data/file/54444/waste-duty-care-code-practice-2016.pdf If you need to register as a carrier of waste, please follow the instructions here:	No	An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects (duty of care) and submitted as part of the Development Consent Order (DCO) Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales If you require any local advice or guidance please contact the National Enquiries Unit on: 03708 506 506		
Environment Agency	Other Environmental Matters (Waste)	Characterisation and Classification of Waste In order to meet your objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments. Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here:	No	An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects (applying the waste hierarchy, duty of care, waste classification) and submitted as part of the Development Consent Order (DCO) Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		https://www.gov.uk/how-to-classify-different-types-of-waste		
Environment Agency	Other Environmental Matters (Waste)	Use of Waste On-Site If materials that are potentially waste are to be used on-site, you will need to ensure you can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply. Where you cannot meet the criteria, you will be required to obtain the appropriate waste permit or exemption from us. A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:	No	It is not anticipated that any waste would be used on site. An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects (permits and exemptions) and submitted as part of the Development Consent Order (DCO) Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. • We have produced guidance on the recovery test which can be viewed at https://www.gov.uk/guidance/waste-recovery-plans-and-permits#waste-recovery-activities. If you require any local advice or guidance, please contact the National Enquiries Unit on: 03708 506 506		
Environment Agency	Other Environmental Matters (Waste)	The Waste Hierarchy and Resource Management in relation to Construction Wastes The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England	No	An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects and submitted as part of the Development Consent Order (DCO) Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb_13530-waste-hierarchy-guidance.pdf Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.		
Environment Agency	Other Environmental Matters (Waste)	Management and Reporting Systems Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.	No	An Outline Site Waste Management Plan (OSWMP) [EN010168/APP/7.16] has been prepared covering these aspects and submitted as part of the Development Consent Order (DCO) Application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		You can find more information on the Waste Framework Directive here: https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive More information on the definition of waste can be found here: https://www.gov.uk/government/publications/legal-definition-of-waste-guidance More information on the use of waste in exempt activities can be found here: https://www.gov.uk/government/collections/waste-exemptions-using-waste Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the WFD). The 'Is it waste' tool, allows you to make an assessment and can be found here: https://www.gov.uk/government/publications		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		s/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests		
Forestry Commission	Ecology and biodiversity (Arb)	Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on Ancient Woodland. As a non-statutory consultee, the Forestry Commission is pleased to provide you with the attached information that may be helpful when you consider the application: • Details of Government Policy relating to ancient woodland • Information on the importance and designation of ancient woodland Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS) It is Government policy to refuse	No	Comment noted. A full environmental impact assessment has been prepared. Full details can be found in the Environmental Statement (ES) [EN010168/APP/6.1] including ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]. Natural England and the Forestry Commission's Standing Advice has been followed in regard to veteran and ancient trees and woodlands. The Order Limits were surveyed by Arboricultural Consultants to identify the locations of any ancient or veteran trees. These are shown alongside recorded ancient woodland in Figures 10-1-1 to 10-1-23 Tree Constraints Plans and Figures 10-2-1 to 10-2-23 Tree Impacts Plans [EN010168/APP/6.2].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “there are wholly exceptional reasons and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 193 (c)). We also particularly refer you to further technical information set out in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and Case Decisions. As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland. If the planning authority takes the decision to approve this application, we may be able		Buffer Zones were applied to ancient and veteran trees and ancient woodlands in accordance with the Standing Advice as detailed in ES Chapter 10: Arboriculture [EN010168/APP/6.1]. Neutral residual impacts to all ancient and veteran trees and ancient woodland are anticipated. Embedded mitigation is secured to ensure possible impacts to identified features are avoided or minimised as detailed in section 10.9 of ES Chapter 10: Arboriculture [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		to give further support in developing appropriate conditions in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that: <i>“Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.” [CONTINUED BELOW]</i> <i>We suggest that you take regard of any points provided by Natural England about the biodiversity of the woodland.</i> <i>We also assume that as part of the planning process, the local authority has given a screening opinion as to whether or not an Environmental Impact Assessment is needed under the Town and Country Planning (Environmental Impact</i>		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		<i>Assessment) Regulations 2017. If not, it is worth advising the applicant to approach the Forestry Commission to provide an opinion as to whether or not an Environmental Impact Assessment is needed under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended.</i> <i>We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact me.</i>		
Forestry Commission	Ecology and biodiversity (Arb)	Dear Lime Down Solar Park Limited, Proposed application to the Secretary of State (SoS) for Energy Security and Net Zero under Section 37 of the Planning Act 2008 for a Development Consent Order for the Lime Down Solar Park. As the Governments forestry experts, we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient Semi Natural Woodland as well as	No	Please refer to Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] which includes an assessment of the potential impacts on trees (including ancient and veteran trees). The assessment concludes no significant effects with the implementation of mitigation. As ancient and veteran trees are considered irreplaceable habitats, the retention of these trees has been designed into the Scheme, and these features will be

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		other woodland. There are several areas of Ancient Semi Natural Woodland (ASNW) and Plantation on Ancient Woodland sites (PAWS) immediately adjacent to the proposed PV and BESS sites including Lord's Wood, Bincombe Wood, Surrendell Wood and Bradfield Wood. Some of which will be constrained on 2 or more sides by the development.		protected throughout the lifetime of the Scheme through the implementation of protective fencing during the construction phase and the retention of buffers during the operational phase. Ancient Woodland sites are mapped as follows: • Lord's Wood - ES Volume 2 Figure 10-01-03 [EN010168/APP/6.2]; • Bincombe Wood - ES Volume 2 Figure 10-01-07 [EN010168/APP/6.2] ; • Surrendell Wood - ES Volume 2, Figure 10-01-03 and ES Volume 2, Figure 10-01-04 and ES Volume 2, Figure 10-01-08 [EN010168/APP/6.2]; • Bradfield Wood - ES Volume 2 Figure 10-01-05 [EN010168/APP/6.2] ; • North Bincombe Wood - ES Volume 2, Figure 10-01-06 and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				ES Volume 2, Figure 10-01-07 [EN010168/APP/6.2]; and • Seagry Wood - ES Volume 2 Figure 10-01-07 [EN010168/APP/6.2].
Forestry Commission	Ecology and biodiversity (Arb)	Ancient Woodland Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states: “Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland,	No	Please refer to Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] which includes an assessment of the potential impacts on trees (including ancient and veteran trees). The assessment concludes no significant effects with the implementation of mitigation. As ancient and veteran trees are considered irreplaceable habitats, the retention of these trees has been designed into the Scheme, and these features will be protected throughout the lifetime of the Scheme through the implementation of protective fencing during the construction phase and the retention of buffers during the operational phase.

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		ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases” Section 5.4.53 goes on to state: “The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons, and a suitable compensation strategy exists”		Ancient Woodland sites are mapped in ES Volume 2, Figure 10-1-1: Tree Constraints Plan [EN010168/APP/6.2].
Forestry Commission	Ecology and biodiversity (Arb)	We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England. Whilst we note that plans include a 15m buffer from Ancient Woodlands, the Standing Advice states that proposals	No	A buffer of 15m from the edge of woodland boundaries is considered sufficient to avoid impacts that result from the Scheme. The embedded and additional mitigation measures proposed within Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] will minimise any negative effects from the construction phase of the Scheme, including those related to construction dusty and traffic impacts. ES Volume 3,

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		should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.		Appendix 10-1 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] provides further information regarding mitigation to avoid potential impacts to trees (including ancient woodland and veteran trees).
Forestry Commission	Ecology and biodiversity (Arb)	There is a need to consider both the direct and indirect impacts resulting from construction. Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include increasing the amount of dust, light, air or soil pollution and changing the landscape character of the area.	No	A full environmental impact assessment has been prepared including direct and indirect impacts resulting from construction. Full details can be found in the Environmental Statement [EN010168/APP/6.3]. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.3] includes a detailed assessment of impacts on ancient woodland, including associated wildlife species. ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] includes an

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				assessment of impacts to arboricultural features (including ancient woodland). ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] provides further information regarding mitigation to reduce or avoid potential impacts to trees (including ancient woodland and veteran trees). No removal or thinning of trees at ancient woodland is proposed. The Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] provided with the application includes measures to reduce or avoid impacts during the construction phase.
Forestry Commission	Ecology and biodiversity (Arb)	We would expect to see a detailed assessment of any impacts to the ancient woodland, including details of measures to be taken to reduce and mitigate any effect. Protection measures include taking care not to cut tree roots (e.g., by trenching) or	No	A detailed assessment of impacts on ancient woodland is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.3]. Direct impacts to arboricultural features within ancient

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		causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution. Also, a lighting strategy to ensure that any lighting does not illuminate the ancient woodlands.		woodlands are assessed as part of ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] . ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] provides further information regarding mitigation to reduce or avoid potential impacts to trees (including ancient woodland and veteran trees) including avoiding soil compaction, contamination and fencing around RPA's. Measures to control lighting and dust are set out in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] .
Forestry Commission	Ecology and biodiversity (Arb)	Due to the irreplaceable nature of ancient woodland, most temporary effects will result in irreplaceable damage. For example, we note that the ancient woodland of Bincombe Wood LWS will be surrounded to the east and south by the solar development and is likely already isolated in terms of connectivity by the railway. We would expect detailed design to consider the potential impacts and the need for	No	The applicant notes this comment. A detailed assessment of impacts on ancient woodland, including associated wildlife species, is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.3] . A buffer of 15m is considered sufficient to avoid impacts that result from the Scheme. ES Volume 1, Chapter 10: Arboriculture

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		additional habitat connectivity than would be provided by the minimum 15m being considered. Such assessment should consider context of other features such as the watercourse for mobile woodland species such as bats.		[EN010168/APP/6.1] and ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] provides further information regarding mitigation to avoid potential impacts to trees (including ancient woodland and veteran trees) Fencing around solar panels will be permeable to all wildlife except deer, meaning animals (excluding deer only) will be able to freely access habitat within solar array without the need for wildlife gates. Fencing will be regularly maintained and inspected for integrity. Wide buffers will be retained around the peripheries of the Solar PV Sites which will allow all wildlife including deer to move between favoured habitats. Fencing will not impede movement of wildlife which migrate seasonally, most prominently birds.
Forestry Commission	Ecology and biodiversity (Arb)	The applicant is advised that Natural England are completing a review and update of the ancient woodland inventory. This exercise is being carried out county-	No	As stated in Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] the revised AWI has been used to inform the baseline. In

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		by-county and may result in the status of some woodland changing. New ancient woodland may be added, especially the inclusion of small woodland parcels previously below the threshold for inclusion. When available, this revised AWI should be used to update the baseline, but all woodland potentially affected should be appraised by suitably experienced ecologists to identify ancient woodland character, presence of veteran trees and current condition.		addition, tree surveys were completed within the Order Limits. Please refer to ES Volume 3, Appendix 10.2: Tree Survey Schedule [EN010168/APP/6.3] .
Forestry Commission	Ecology and biodiversity (Arb)	Priority Habitat We note there are several areas of mixed deciduous woodland both within the site area and adjacent to it. Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England). They were recognised under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action.	No	The applicant notes this comment. A detailed assessment of impacts on ancient woodland is provided in Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] . The Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] prescribes management measures designed to ensure proposed tree-planting to connect existing woodland areas is established and maintained successfully. Direct impacts to arboricultural features within ancient

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		The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England". Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states: "Existing trees and woodlands should be retained wherever possible..... The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable,		woodlands are assessed as part of ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] such as soil compaction, tree pruning and dust and pollution. The Outline Arboricultural Method Statement provided in ES Volume 3 Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EN010168/APP/6.3] will specify necessary protective measures in order that direct impacts are suitably controlled.

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		compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured" Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. We encourage initiatives, as mentioned in 9.10.95 Volume 1, Chapter 9 to connect fragmented woodlands through tree planting, such as between Lord's Wood and Cream Gorse. This approach aligns with the draft Wiltshire Local Nature Recovery Strategy (LNRS), currently under public consultation, which outlines measures and outcomes to guide habitat types that will		

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		most effectively support nature recovery in this area.		
Forestry Commission	Ecology and biodiversity (Arb)	Tree Planting With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes: · Biosecurity of all planting stock needs to be considered to avoid introducing pests and diseases. · Woodlands need to be climate, pest and disease resilient. · Maximise the ecosystem services benefits of all new woodland wherever possible. · Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape. · Plans are in place to ensure long term	No	Proposals for woodland planting including new woodland belts and new woodland blocks are shown in Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. Approximately 11.37 hectares of new woodland will be created in accordance with the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]. The Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]. details how new woodland planting will be diverse with up to 14 native tree and shrub species listed in Table 4 of the Outline LEMP [EN010168/APP/7.18] This diversity will maximise climate, pest and disease resilience. The Outline LEMP [EN010168/APP/7.18] confirms that tree planting will be undertaken in accordance BS 8545. Trees:

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		management and maintenance of woodland.		From Nursery to Independence in the Landscape and its associated biosecurity guidance.
Forestry Commission	Ecology and biodiversity	Veteran and ancient trees in woodland and on field boundaries Chapter 10 of the PEIR considers high value trees which could be affected, with 12 identified in the areas surveyed to date. It is important that survey is completed in the cable route search corridor to inform final designing and CEMP. We support the intention to protect all trees in line with the indicative mitigation (section 10.9).	No	Comment noted. The adopted survey methodology for the cable route will identify all ancient and/or veteran trees within and in the influence of works in cable route corridor. Arboricultural constraints will be fully considered as part of the ongoing design. The Outline Arboricultural Method Statement provided with the Environmental Statement (ES) [EN010168/APP/6.1] will specify necessary protective measures in order that direct impacts are suitably controlled.
Gloucestershire County Council	Transport and access	Highways Commissioning GCC officers advise that all construction traffic and subsequently service traffic should access the site from M4 junction 17. Construction and service traffic should be restricted from using both of the following Gloucestershire A roads in the vicinity: • A429 which would take them through Cirencester • A433 which would go via Tetbury	No	The construction vehicle routes for the Scheme are set out within Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2] .

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		M5 Bristol to M4 or A429 Swindon to M4 should be designated construction traffic routes from the north.		The Applicant can confirm that the Scheme would be accessed from Junction 17 and 18 of the M4. Construction vehicle routes will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO).
Gloucestershire County Council	Consultation and Engagement	Dear Sir/Madam, Second stage of consultation on plans for Lime Down Solar Park in Wiltshire Thank you for consulting Gloucestershire County Council (GCC) on this matter. GCC officers have reviewed the consultation materials towards next steps of the DCO application process for Lime Down Solar Park in Wiltshire. Officers highlight issues of carbon emissions and access to the site.	No	The Applicant makes note of this comment.

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		Detailed officer-level comments are as below.		
Gloucestershire County Council	Consultation and Engagement	Libraries GCC officers have no further comments to make. Minerals and Waste Planning GCC officers have no further comments to make. Public Health GCC officers have no further comments. Transport Planning GCC officers have no further comments to make	No	The Applicant makes note of this comment.
Gloucestershire County Council	Climate change and energy need / Traffic, transport and access	Climate change GCC officers would welcome further consideration for low emission vehicles for construction purposes (including worker transportation), considering potential impact on air quality from their movement through Gloucestershire. Officers note in chapter 7 of the Preliminary Environmental Information Report (PEIR), 7% of construction phase emissions regard to worker transportation and delivery of	No	There will be a construction worker travel plan and shuttle bus to reduce the effects of construction worker travel on the local highway network, and minimise emissions.

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		materials. Will there be incentives for workers to car share, use public transportation, shuttle services or will there be EV charging facilities on site? Similarly, exploration into construction machinery and where low emission technologies are available, it would also be beneficial to see and incorporate any		
Great Somerford Parish Council	Hydrology, flood risk and drainage	Great Somerford Parish Council response to formal consultation Lime Down Solar Park. Site E contains land within Great Somerford Parish Council Boundary. Having attended the public meeting at Goss Croft Hall and spoken to an adviser on hydrology the Parish Council were surprised by information available and lack of understanding of the surface water drainage within the site, and the resulting surface water flow routes in the watercourses to the Bristol Avon.	No	The Applicant acknowledges the concerns raised by Great Somerford Parish Council in relation to drainage, flood risk, and the importance of maintaining vehicular access along the C82. The Scheme has been designed to ensure that it does not exacerbate existing flood risk issues. The majority of the developed area, including Site E, comprises solar panels mounted over vegetated ground, which will remain permeable. As confirmed in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], and supported by research such as Cook and

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		Failure to mitigate the peak flows at the time of intense rainfall incidents will result in vehicular access to Great Somerford being limited to large 4x4 vehicles. In recent years the only access to the village has been via the C 82 to Malmesbury. The development area includes areas where ground water overtops the ground level and with updated reports on rainfall predictions and flooding predictions from the Environment Agency this will result in increased flows in the watercourses. A large area of this development will have land drainage systems installed by large estates on their tenanted farms during the 19th and 20th centuries. The water management provided by these systems are essential to ensure the land can reach its maximum potential whether in a regenerative or conventional farming system. Failure to maintain these systems not only		McCuen (2013), this land use change is not anticipated to increase surface water runoff where vegetative cover is maintained. Infrastructure areas such as Battery Energy Storage Systems (BESS) and substations are supported by detailed site-specific Flood Risk Assessments and Drainage Strategies, as provided in ES Volume 3 Appendices 11.7 and 11.8 [EN010168/APP/6.3], which ensure runoff is attenuated to greenfield rates and does not increase flood risk on or off site. Drainage designs are being developed to accommodate storm events and reasonable worst-case scenarios, including potential fire suppression flows. The Scheme does not involve the removal or decommissioning of existing field drains or historical land drainage systems. These will be preserved wherever practicable. Where unavoidable interactions are required, appropriate mitigation will be implemented and secured through the final

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		reduces good soil structure but also increases flooding potential. Failure to maintain the existing drainage systems and all the watercourses will result in high levels of run off increasing the risks of road flooding particularly on the C82, where both the Rod Burna brook and the Gausebrook, cross the highway. Maintenance of the existing drainage systems requires the collection of data for all field drainage systems where detailed plans exist, and a survey to identify features on the ground indicating the presence of outfalls. With the risks to flooding on the C82 and vehicular access to Great Somerford together with the need to carefully preserve the hidden infrastructure (Land drainage) the Parish Council request any future application should provide evidence that sufficient measures will be taken to mitigate the flood risk outlined on the C82 at times		design and Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. The Outline CEMP [EN010168/APP/7.12] sets out measures to identify, protect, and, where necessary, repair any existing drainage infrastructure to industry standards. A long-term maintenance regime will be established, and all proposed drainage systems will be monitored and maintained to ensure continued function. The Applicant is committed to managing these systems in accordance with the agreed maintenance schedules and responsibilities, as set out in the Drainage Strategy as provided in ES Volume 3 Appendices 11.7 and 11.8 [EN010168/APP/6.3], and Outline CEMP [EN010168/APP/7.12]. In summary, the Scheme will not increase flood risk to Great Somerford or the C82 and has been developed to preserve existing drainage features while ensuring

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		when the predicted increased flows occur. The Parish Council also requests. - all construction management plans require any hidden infrastructure damaged is repaired to industry standards. - Maintenance plans ensure that all drainage systems are regularly monitored, and necessary maintenance is carried out in a timely manner. - All flood mitigation measures are regularly monitored and maintained when necessary.		that all new infrastructure is appropriately mitigated and maintained.
Grittleton Parish Council	Transport and access	Transport – - Construction delivery traffic, the applicant has offered no alternative transport method to deliver materials to the sites. The area is bisected by a main railway line. There is a siding located at the former Hullavington Station where equipment could be delivered by rail. This alternative would remove a large number of vehicles from the road network. Until the design is finalized and a construction management plan published we are unable to access the	No	The Applicant does not have control over the user of the rail network, nor the mentioned siding. A conservative assumption has been made regarding the number of construction workers using the shuttle bus. In reality, the number is likely to be higher than 50%. This is due to the proportion of the workforce that will be non-local and staying in local accommodation from which shuttle buses will run from/to.

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		accuracy of the information published. - Construction workers transportation, there have been no alternative numbers offered regarding modes of transport, the numbers presented have assumed 50/50 split between coach & private vehicles with a 100% load factor on a coach. It also assumes that the coaches will remain on site all day, these numbers are clearly optimistic and a truer picture should be presented with other scenarios modelled. - There are no practical means of controlling routes that private vehicles will take to the construction sites. This raises serious concerns regarding road safety. - There has been no recognition of the traffic generated around transportation of school children, the no travel period must also cover the afternoon school travel period. - The local route network (C Roads) are		As stated, the majority of construction workers will access the Site via shuttle bus. The shuttle bus routes will be controlled through the Construction Traffic Management Plan (CTMP). Private vehicle users associated with the Scheme will be advised of the construction vehicle route, and instructed to follow it. Construction vehicle movements will be managed through a CTMP. This will be a requirement of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An outline CTMP [EN010168/APP/7.22] has been submitted with the DCO. One measure included within the CTMP is to restrict HGV arrival and departure times so that they do not conflict with peak commuter times and school drop-off/pick-up times.

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		unsuitable for such high intensity use by HGV's & construction workers traffic and potentially constitutes a breach of residents human rights (Right to peacefully enjoy one's possessions).		
Grittleton Parish Council	Project description and DCO process / Cultural Heritage	Grittleton Parish Council Submission to Lime Down Solar Park Statutory Consultation March 2025 Grittleton Parish Council represents the village of Grittleton as well as the settlements of The Gibb, Littleton Drew, Sevington & Leigh Delamere. Grittleton village, Leigh Delamere & Sevington are conservation areas, there are many listed buildings within these areas. The proposed panel areas lie outside of the parish boundaries, however the proposed construction traffic route which utilises the B4039 passes through The Gibb, traverses the C72 (The Gibb to Grittleton) and C86 northwards from Grittleton to the panel area (A,B &C) pass through the parish.	No	The Applicant provided a broad range of Scheme team members at the information events, including Environmental Impact Assessment (EIA) specialists and Island Green Power representatives, to ensure coverage of a wide range of aspects of the Scheme. Where questions could not be answered on the day, attendees were invited to leave their contact details, and the Applicant followed up after the event to provide the requested information. This approach was designed to ensure all queries received an informed response, even if not immediately available at the event.

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		As it stands, though available details are limited, the cable route search corridor passes to the east of Grittleton, could possibly pass close to Grittleton Village Hall, may pass adjacent to the residential Ryleys Farm development go across the M4 and will pass either to the west of Sevington or to the west of Leigh Delamere & east of Sevington. It is not at all clear. Councillors attended the consultation event in Grittleton and have also received feedback from residents. There was widespread disappointment at the standard of the information presented and knowledge of staff present, who were unable or unwilling to answer questions.		
Grittleton Parish Council	Scheme description and DCO process / Cultural Heritage	Cable route - - At this statutory consultation stage, there is a disappointing lack of available information about the exact cabling route and temporary construction compounds as well as little detail about noise levels during construction to enable a fuller response to the proposals.	No	The Preliminary Environmental Information Report (PEIR) was a snapshot of the Applicant's assessment at that time. The Applicant considers the amount of information published during statutory consultation was sufficient. Further details regarding the Cable Route

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		- The Street, Grittleton is a conservation area, has multiple listed buildings yet has been listed as a potential access point, this is totally unsuitable, given that the majority of properties have no off street parking, the potential economic impact on the village pub & village hall. Sevington & Leigh Delamere are conservation areas like Grittleton and should not be considered as suitable access points.		Corridor and temporary construction compounds are contained within Environmental Statement (ES) Volume 1, Chapter 2: The Scheme [EN010168/APP/6.1]. The location of the Cable Route Corridor is shown within ES Volume 2, Figure 2-1: Elements of the Site [EN010168/APP/6.2]. The location of temporary construction compounds are shown within ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2]. In terms of noise levels, please refer to ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. Please refer to ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] which includes the cultural heritage assessment (including consideration of the listed buildings and the conservation area

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				within Grittleton). The socio-economic impact of the Scheme (including the impact on Grittleton village hall) is considered within ES Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. The assessment concludes that no significant effects are expected for Grittleton Village Hall with the implementation of transport mitigation measures.
Grittleton Parish Council	Cumulative Effects / Landscape and visual / Socioeconomics, tourism, recreation and health	Cumulative impact – - The panel areas lie outside the Cotswold National Landscape (CNL), they are close to the boundary and therefore the visual impact is important looking both from the CNL and towards the CNL. This area of the CNL is defined as Dip Slope Lowland by the CNL and the characteristics equally apply to the adjoining land. These characteristics will be lost by the industrialisation of the landscape with vast areas of mono colour solar panels and associated infrastructure. The need to screen these structures will fundamentally change the characteristics of the area. This	Yes (assessment) - new scheme added to cumulative list.	The Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1] has considered the effects of the Scheme on all landscape and visual receptors within the Cotswold National Landscape (CNL). The effects on the Special Qualities of the CNL are also assessed in ES Volume 3: Appendix 8.4- Assessment of Effects on the Special Qualities of the Cotswold National Landscape. It is noted that the Kington St Michael/

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		will have a lasting adverse impact on both the mental well-being of residents who enjoy the current characteristics of the south Cotswolds and deter tourism which is an important contributor to the local economy. Furthermore, there are a number of well attended annual events that the construction period will impact (e.g. Badminton Horse Trials) - There are concerns that the project will jeopardize the future of farming in the area as agricultural land is repurposed from food to energy production when food security is unequal to energy security. - The local area will soon be covered by solar panels and it is important to realise that many local residents will be constantly passing close by solar farms just going about their daily business with 49.9 mw solar park to be built between Sevington & Leigh Delamere and a further 40 MWac solar park at Red Barn, there are also several other solar parks in the area.		Kington Langley site known as Red Barn has, we believe, been erroneously excluded from the analysis (PEIR Volume 3 Appendix 21.1 – Long List of Cumulative Schemes Line 243 Page 73). A detailed assessment of the likely significance of effects from the Scheme on the use and desirability individual PROW, tourism destinations such as the Cotswold National Landscape and Badminton Horse Trials, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations and events, and the potential impact on tourism-dependent businesses in the areas immediately

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		Wiltshire is already a huge contributor to solar power generation with 34 ground mounted solar PV sites with capacity greater than 10MW either installed or planned, of which 11 are greater than 49.9 MW. - It is noted that the Kington St Michael/ Kington Langley site known as Red Barn has, we believe, been erroneously excluded from the analysis (PEIR Volume 3 Appendix 21.1 – Long List of Cumulative Schemes Line 243 Page 73) - The numbers of construction workers requiring accommodation will have a significant negative impact on the tourism economy in the area.		impacted by the Scheme. The impact on the agricultural economy and food production as a result of the Scheme, or cumulative solar schemes in Wiltshire are not significant in comparison to the current quantum of land in arable and food production use. While the Applicant team is aware of food security as a national concern, government policy does not set out that food security matters are of greater importance than current low-carbon / net zero energy security requirements. As such, these have not been assessed as likely significant effects to socio-economics or human health. Impacts on mental health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on community identity and culture, and the likely mental health impacts of changes to these. Priority has been given in the assessment to the communities most

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				immediately affected by changes to their visual and landscape setting. Chapter 18 concludes that no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. The assessment of likely accommodation need for temporary inbound workers has been set out in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. This assessment finds that there is sufficient usually vacant accommodation space (both in serviced accommodation or in vacant private rental spaces) within the 20km Study Area to accommodate temporary inbound workers without affecting usual visitors or placing additional demand on the rental accommodation market.
Grittleton Parish Council	Consultation and engagement / Scheme	Conclusion - - Information presented on the website is very poorly presented and resembles a data dump rather than a source of	No	The Applicant makes note of these comments. The Applicant Scheme website met

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	description and DCO process	information. The maps provided do not provide adequate detail (e.g. roads are not clearly marked). - The Parish Council are fully supportive of the stance taken by Wiltshire Cabinet on 4th March both with the unanimous vote against the project and the public rebuke issued to yourselves for not attending the meeting. - Consultation events were poor as the data presentation was weak, with a lot of missing or incomplete information and poorly briefed staff. - Secondary Consultation, we strongly urge you to run a further consultation when you are in a better position to present the full picture of the long term harm & destruction that you will be inflicting on this area of the Cotswolds. We will be writing to our Member of Parliament asking for her support in this matter.		accessibility standards and reflected the same information as set out in the Scheme Information Booklet produced for the statutory consultation. All maps were based on those produced for the Preliminary Environmental Information Report (PEIR) and identified as 'indicative for statutory consultation,' with a call out box clearly directing to the PEIR for more detailed versions and where to access them. Maps were available at events, on the website, at CAPs and upon request. The PEIR was available in full at consultation events. Unfortunately due to short notice and limited availability during the statutory consultation period, the Applicant did not have availability to attend the Wiltshire Cabinet meeting on 04 March 2025. The Applicant has continued ongoing engagement with Wiltshire Council via monthly Steering Group meetings and technical discussions with officers. Further the Applicant is considering Wiltshire Council's response to the statutory

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		- Grittleton Parish Council will continue to object to this project in the strongest possible terms. - Woodland cover limited to intermittent copses and shelterbelts within agricultural landscapes creates some wide expansive views. These are in contrast to more intimate landscapes with restricted views in the vicinity of large estate plantations. - Limited areas of ancient woodland and species rich grassland indicates the impact of intensive farming. - Settlement pattern of intermittent small nucleated villages, hamlets and isolated farmsteads, together with occasional larger settlements, contribute to the strong rural character. - Distinctive pattern of large estates and associated planned parkland landscape and woodland occurring throughout the		consultation in full, including the technical response document along with a statement of the Council's Cabinet as received on 19 March 2025. Regarding the concerns around woodland cover, the Applicant notes that an assessment is provided in Environmental Statement (ES) Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Chapter 10: Arboriculture [unsure is this forms part of Ch10]. Concerns on ancient woodland, species rich grassland and agricultural land, are addressed in ES Chapter 9: Ecology and Biodiversity, Chapter 10: Arboriculture and Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Concerns on settlement patterns, dip-slope lowland and long term occupation are addressed in ES Chapter 8: Landscape and Visual and Chapter 12: Cultural Heritage [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		- Dip-Slope Lowland makes an important contribution to the wider character of the landscape due to the influences of designed parkland and planned woodland planting which often form a backdrop to long distance views across the otherwise open landscape. -Evidence of long period of occupation of the area.		
Grittleton Parish Council	Community benefits and impact	Community Benefits There appears to be no direct benefit identified for the areas most affected by the proposals or any suggestion of community ownership possibilities so that local communities could have reduced priced electricity bills. Any fund set up to benefit the area should be administered by a dedicated organisation and the town and parish councils most affected have input into the decision making rather than it be set up for all comers.	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
Health and Safety Executive (HSE)	Other Environmental Matters (Utilities)	Will the proposed development fall within any of HSE's consultation distances? According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of a major accident hazard pipeline [MAHP]. This is based on the Lime Down Solar Park "Solar PV Sites2 and "Cable Route Search Corridor" boundaries (red and blue lines) shown in the document, 'Figure 2-1 Elements of the Site' in Volume 2 – Figures	No	The Applicant makes note of this comment. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions are in place to prevent any risk of major accidents in relation to this asset. A full assessment of Major Accidents and Disasters is available in Environmental Statement (ES) Chapter 20: Other Environmental Matters, Section 20.7 [EN010168/APP/6.1]. This chapter concludes no significant effects are expected as a result of the Scheme.

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		[downloaded from: https://www.limedownsolar.co.uk/documents]. The major accident hazard pipeline is operated by National Grid Gas and is: 14 Feeder Wormington / Pucklechurch; HSE ref. number 7227, Transco ref.: 1497. The Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this: i) The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline. ii) The standards to which the pipeline is		

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		designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds. iii) To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards. HSE's Land Use Planning advice is dependent on the location of areas where people may be present [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the Preliminary Environmental Information Report January 2025 and its supporting volumes of information, it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided.		

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		HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.		
Health and Safety Executive (HSE)	Other Environmental Matters (MADS)	Would Hazardous Substance Consent be needed? Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended [https://www.legislation.gov.uk/ukxi/2015/627/made], if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.	No	Hazardous Substance Consent is not required for the Scheme as there are no in-scope hazardous substances as per Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 on site. This is confirmed in Environmental Statement (ES) Chapter 20: Other Environmental Matters, Section 20.7 Major Accidents and Disasters [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Based on the Preliminary Environmental Information Report January 2025 and its supporting volumes of information, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.		
Health and Safety Executive (HSE)	Other Environmental Matters (MADS)	Consideration of Risk Assessments: Regulation 5(4) [https://www.legislation.gov.uk/ukxi/2017/572/regulation/5/made] of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 [https://www.legislation.gov.uk/ukxi/2017/572/contents/made] requires the assessment of significant effects to include, where relevant, the expected	No	The Applicant confirms that the '14 Feeder Wormington / Pucklechurch; HSE ref. number 7227, Transco ref.: 1497' pipeline has been assessed within Environmental Statement (ES) Chapter 20: Other Environmental Matters, Section 20.7 [EN010168/APP/6.1] under the 'Damage to/cut off of utilities' heading. The chapter concludes that risks associated with utilities failure are considered not significant.

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		significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk). This document includes consideration of risk assessments under the heading "Risk assessments". In the Error! Reference source not found. Report it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents (e.g. from the above identified sites and/or pipelines). We would advise this is considered further in line with Advice Note 11 Annex G taking		

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		account of the following: "it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses."		
Health and Safety Executive (HSE)	Other Environmental Matters (MADS)	Explosives sites: CEMHD 7's comment remains the same as previous response in July 24 - No comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development. Electrical Safety: No comment from a planning perspective.	No	The Applicant makes note of this comment.
Historic England	Cultural Heritage	Dear Mr [REDACTED] Lime Down Solar Statutory Consultation under Section 42 of the Planning Act 2008 and Regulation 11 of the Infrastructure Planning (Environmental	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Impact Assessment) Regulations 2017. Summary Historic England is the Government's lead advisor on the historic environment, and we are a non-departmental public body sponsored by, and reporting to the Secretary of State for Culture, Media and Sport. For the purposes of Section 42 of the Planning Act 2008 and Regulation 11 of Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, we are a statutory consultee. This consultation relates to the Lime Down Solar Power Project, which has been directed by the Secretary of State for Energy Security and Net Zero as a Nationally Significant Infrastructure Project in relation to Section 35 of the Planning Act 2008 (as amended). We understand that the Planning Inspectorate expects to receive an application for a Development Consent Order (DCO) between July and September 2025, and that the project is		

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		currently at pre-application stage. The consultation comprises a suite of documents, including the main Preliminary Environmental Information Report (PEIR). Our response is provided based on the information provided at this time. Please find Historic England advice below, all references to section, paragraph and table numbers relate to the main Chapters of the PEIR. Our response has been put together by a team of specialists within our organisation, who form our project team.		
Historic England	Cultural Heritage	The Proposal Lime Down Solar Project would be located in an open rural landscape North of Hullavington, Southeast of Sherston, and West of Rodbourne, Wiltshire. It is a large area bisected by numerous roads, public rights of way, and a main line railway. An underground cable would connect the site to the National Grid via a substation near Melksham.	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		The project comprises of a large solar farm and associated infrastructure and would comprise of inverters, transformers, a battery energy storage system, an online substation, site access, cable connections, security fencing and CCTV monitoring equipment, construction compound and any required landscaping. The project is in the general vicinity of a range of designated and non-designated heritage assets and may therefore result in direct or setting impacts on these assets.		
Historic England	Cultural Heritage	Summary of Key Issues <i>Built Environment Setting</i> We appreciate the creation of buffers around the listed buildings and conservation areas. We recommend that for the Environmental Statement (ES) the assessments of setting are expanded upon and given as a descriptive text within the relevant Chapter. We do not think that the use of the cultural heritage impact	No	Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by ES Volume 3, Appendix 12.3 Heritage Statement [EN010168/APP/6.3], provides a full assessment of the potential impacts to heritage assets including any indirect impacts (i.e. to their setting). The assessment has been undertaken in line with industry standard and guidance (including Historic England Historic

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		assessment tables has fully explored the potential impacts of the development on the heritage assets. The assessment needs to follow out GPA3 Guidance for the highly graded assets using a descriptive narrative within the ES. Only relying on the DMRB Tables, may in our view, not be an appropriate level of assessment. We would appreciate the Grade I and Grade II* buildings being dealt with separately and not dealt with together with all listed buildings. Historic England has a defined role in the English planning system generally restricts our comments to potential impacts on Grade I and II* listed buildings, scheduled monuments, and development where the site is over 1000sq and in a conservation area. We are particularly concerned about the potential impact of the scheme on Bradfield Manor Farm Grade I LB. We would		Environment Good Practice Advice in Planning Note 3). It is noted that Grade I and II Listed Buildings should be dealt with separately to Grade II Listed Buildings. A site visit was undertaken to Bradfield Manor with Historic England in April 2025.

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		appreciate an opportunity to visit Bradfield Manor Farm to view the proposed site from the property.		
Historic England	Cultural Heritage	<i>Archaeology</i> We understand that the archaeological evaluation work is underway. It is unfortunate that the results of that work so far were not included in the PEIR. Without those results it is difficult for us to comment on the impact of the proposals on the significance of the archaeology. At this stage Historic England are mindful that some of that archaeology may be of national importance and may need to be dealt with differently. We will continue to review this and our involvement through the pre-DCO period and DCO submission. We would recommend that an Overarching Written Scheme of Investigation (OWSI) and Draft Archaeological Mitigation Statement (DAMS) is submitted with the ES as part of the Construction Environmental Management Plan (CEMP). These	No	The results of the archaeological evaluation are provided in Environmental Statement (ES) Volume 3, Appendix 12.4: Archaeological Geophysical Survey Report and Appendix 12.5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]. The results of the archaeological survey have been used to inform ES Volume 3: Appendix 12.6: Archaeological Mitigation Strategy [EN010168/APP/6.3]. The AMS identifies a range of different mitigation options including mitigation by preservation (i.e. removal of solar infrastructure, concrete feet) and mitigation by record (i.e. strip, map and sample and archaeological monitoring). The Applicant refers to Historic England Advice Note 15 Commercial Renewable Energy Development and the Historic

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		documents will be crucial in providing us and the Local Planning Authority (LPA) with the confidence that the archaeology is fully understood and the mitigation proposed is sufficient. We note the proposed use of concrete shoes to mitigate the impact on archaeology and that you refer to our guidance on this matter. We need to make it clear that this guidance is for small scale solar within a private property, where panels on a roof may not be suitable. You need to refer to our Renewable Energy Guidance for suitable mitigation for archaeological impacts for Solar Farms. The construction method for the panels needs to be assessed against the significance of the archaeology. The results of the archaeological evaluation work will provide an idea of what that significance is. Based on that assessment the solar panel foundation design needs to either avoid or mitigate any harm identified. It may be		Environment, which states: " Assessment of potential heritage impacts of a solar park will typically cover groundworks, such as those from the supports for the solar panels, cable trenches and hard-standings for access or equipment. Mitigation may be possible; for example, the use of concrete bases for the panels, which entail less ground disturbance. Planning guidance published by BRE supported by Cornwall Council notes that: "Where possible Solar PV arrays should be installed using 'pile' driven or screw foundations, or pre-moulded concrete blocks (shoes), and capable of easy removal. The use of shoes may be required for archaeological sensitive areas." The vehicles and equipment used during construction can also damage archaeological remains." ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] identifies the significance (sensitivity) of archaeological assets. Potential impacts to buried archaeological remains include

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		appropriate to leave some areas undeveloped to protect the archaeology. These areas can potentially then also be used for ecology benefits and BNG. This will be set out within the DAMS. We also note that off-site Biodiversity Net Gain (BNG) and ecology improvements may result in impacts on archaeological sites and these need to be identified and an archaeological assessment undertaken as well. The cable route is the biggest risk with regards to unexpected archaeology, as no geophysics has yet been undertaken. Once the cable route has been identified and refined, we would expect geophysics to be undertaken followed by evaluation to identify any significant archaeological remains. Any archaeology identified along the route will need to be fully excavated along the route. Any archaeology not evaluated during the		ground disturbance as a result of ecological improvements and BNG. In terms of the requirement for geophysics in the cable route, this is scheduled to take place at the end of the summer 2025 (post-harvest).

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		pre-application stage will need to be factored into the construction programme after consent has been granted. This could be a significant risk to timing for the project and needs to be carefully thought about and adequate time added to the construction programme.		
Historic England	Cultural Heritage	National Planning Policy Historic England recognises that climate change is one of the most challenging issues of our time, with potential negative consequences for both people and heritage. The National Policy Statement for Energy (EN-1) establishes that electricity infrastructure has a part to play in tackling climate change and in delivering sustainable development more broadly. Achieving sustainable development will depend on the way in which energy infrastructure is deployed. Paragraph 4.1.5 states that in considering any proposed development, in particular when weighing its adverse impacts against	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		its benefits, the Secretary of State should take into account: - its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits - its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy. EN-1 paragraph 4.3.15 highlights the requirement that as part of their Environmental Statement, Applicants must provide information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial		

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		feasibility. The consideration of alternatives needs to be proportionate. EN-1 paragraph 4.7.2 states that applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage.		
Historic England	Cultural Heritage	EN-1 also highlights the potential for impacts on both above and below ground heritage. Paragraph 5.9.6 confirms the principle that non-designated heritage assets of demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets. The absence of designation for such assets does not indicate that they are of lower significance or not of national importance. Paragraph 5.9.9 confirms that in relation to heritage, the Environmental Statement should describe how the mitigation hierarchy has been applied. Paragraph	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		5.9.10 goes on to require the Applicant to describe the significance of any heritage assets affected by the proposed development, including any contribution made by their setting. The policy statement describes the need for information to support assessment of impacts such as archaeological desk-based assessment, field evaluation and accurate visualisations to explain the impact on settings (5.9.11).		
Historic England	Cultural Heritage	Further studies may be needed in relation to matters such as noise, vibration and light (5.9.12). Applicants are also encouraged to explore measures to enhance the historic environment (5.9.13) or to better reveal significance (5.9.15). Any loss or harm to a heritage assets significance should be justified (5.9.17) and the Secretary of State may impose requirements on the DCO to ensure that work is carried out in accordance with a Written Scheme of Investigation (5.9.18); and to ensure that loss does not occur until the relevant part of the development has commenced (5.9.20) and that appropriate procedures are in	No	The Applicant notes these comments. Potential impacts on cultural heritage assets and mitigation is set out in Environmental Statement (ES) Volume 3: Appendix 12.6: Archaeological Mitigation Strategy [EN010168/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		place if as yet unknown heritage assets are discovered. Decision making criteria for the historic environment are set out at 5.9.22 - 5.9.36, including that the Secretary of State should give great weight to the conservation of designated heritage assets. Any harm or loss will require clear and convincing justification and a balancing exercise will be required bearing in mind the significance of the assets affected, the degree of harm, and the public benefits of the proposal. Any loss or harm to a heritage assets significance should be justified (5.9.17) and the Secretary of State may impose requirements on the DCO to ensure that work is carried out in accordance with a Written Scheme of Investigation (5.9.18); and to ensure that loss does not occur until the relevant part of the development has commenced (5.9.20) and that appropriate procedures are in place if as yet unknown heritage assets are discovered.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Decision making criteria for the historic environment are set out at 5.9.22 - 5.9.36, including that the Secretary of State should give great weight to the conservation of designated heritage assets. Any harm or loss will require clear and convincing justification and a balancing exercise will be required bearing in mind the significance of the assets affected, the degree of harm, and the public benefits of the proposal. The National Policy Statement for renewable energy (EN-3) provides complimentary policies that are applicable to a range of renewable energy projects, including solar. This includes additional policies relating to cultural heritage from 2.10.107 to 2.10.199 and identifies the possibility of a positive effect on archaeology by removing a site from regular ploughing. We also note that mitigations for cultural heritage impacts are outlined in 2.10.137-2.10.138 and include micro-siting and potential to amend precise locations during the construction phase.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Historic England	Cultural Heritage	The National Policy Statement for Electricity Networks Infrastructure (EN-5) provides further policy for the associated energy distribution networks. While we acknowledge that the initiating and terminating points of new energy networks may not be substantially within the control of the applicant, EN-5 nevertheless highlights that applicants retain control of routing and site selection within the development zone (2.2.5). The electricity line will often therefore not be via the most direct route, bearing in mind environmental and other considerations (2.2.7), and there will be a degree of flexibility in location of associated sub-stations (2.2.8). The applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts (2.2.9). EN-5 2.2.10 notes that under Schedule 9 to the Electricity Act 1989 there is a duty have	No	The Applicant notes these comments. The cable route has been designed with consideration to heritage assets. Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] provides an assessment of the potential impacts as a result of the cable route.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		regard to “protecting sites, buildings and objects of architectural, historic or archaeological interest” amongst other things. The applicant should consider and address routing and avoidance/minimisation of environmental impacts at an early stage in the development process (2.10.1).		
Historic England	Cultural Heritage	Detailed Comments on the PEIR <i>Chapter 12</i> 12.11.3 states a WSI will be submitted with the DCO application. As the archaeological mitigation will be spread over a number of sites and across the 6 areas of development (A to E and Cable Route) we would expect to see an overarching WSI submitted in support of the DCO. This should be linked to a requirement under the CEMP to ensure it is fully integrated into the development process. The OWSI should be informed by an Archaeological Mitigation Statement. Using the results of the evaluation and other	No	The Applicant notes these comments. An overarching archaeological mitigation strategy (AMS) is provided in Environmental Statement (ES) Volume 3, Appendix 12.6: Archaeological Mitigation Strategy [EN010168/APP/6.3]. WSIs (or Scheme designs) will be appended to the AMS which detail individual phases of works. Mitigation is included within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline Landscape and Ecology Management Plan (LEMP) [EN010168/APP/7.18] to

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		surveys and assessments to set out the significance of the archaeology and how potential harm to this will be minimised and mitigated, e.g. by avoiding direct impacts, through excavation, preservation in-situ, etc. This will need to be agreed with the Local Authority's Archaeological Service. They will take advice from us on any archaeology deemed to be of national significance. Our Science Advisor will also provide advice on any technical scientific advice to the LPA and the Contractor to ensure the mitigation is done to the highest standard. We would then expect a series of Site Specific WSIs for each mitigation area that has been agreed. 12.3.6 we welcome the proposal to ensure all areas of mitigation are cross referenced with other Chapters and proposed works. In particular we would highlight the need to consider potential impacts (positive or adverse) on heritage assets and their		avoid impacts to heritage assets. ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by ES Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3], provides a full assessment of potential impacts to heritage assets including any indirect impacts (i.e. to their setting). The applicant considers Horizontal Directional Drilling (HDD) to be an appropriate form of archaeological mitigation. Where HDD is proposed to go directly under archaeological assets, an appropriate depth of drilling will be identified to ensure no direct impacts are caused to archaeological assets.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		settings (including archaeology) of any landscape mitigation (6.3.9) and any Biodiversity or Ecology mitigation required (6.4.19). This also applies to any mitigation planting proposed in response to protecting the setting of other designated assets (12.9.5) 12.9.7 Horizontal Directional Drilling (HDD) under the archaeology is not something we recommend. We would need to understand the archaeology first and what depth it survives to. Our concerns relate to potential settling of the ground above and changes to hydrology that may impact on the buried archaeology following installation. Once in operation any repairs needed along the cable within an HDD section would potentially require excavation. If there is preserved archaeology in the area this may not be excavated in a controlled manner and the archaeological information will be lost.		
Historic England	Cultural Heritage	<i>Built heritage and designed landscapes</i> Historic England's role is limited to	No	Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		commenting on potential impacts to Grade I or II* listed buildings, Scheduled Monuments, and developments where the site area is over 1000sq m and in a conservation area. For impacts on Grade II listed buildings and locally designated or non-designated heritage assets, we refer you to the specialist conservation team at Wiltshire Council. In the context of the above, we are concerned in particular at the potential impact on the setting of Bradfield Manor, a Grade I listed building. There may also be potential impacts on the setting other listed buildings that fall within our remit, including the highly-graded village churches and notably the Grade II* listed church of St Giles, Alderton. There also may be potential for the setting of the Grade I Registered Park at Badminton to be affected in longer views.		[EN010168/APP/6.1] supported by the Heritage Statement in ES Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3], provides a full assessment of potential impacts to heritage assets including any indirect impacts (i.e. to their setting). This includes an assessment of: - Grade I Listed Bradfield Manor; -Grade II* Listed Church of St Giles, Alderton; and - Grade I Listed Badmington RPG The assessment concludes no significant effects with the implementation of mitigation outlined in ES Volume 3, Appendix 12.6: Archaeological Mitigation Strategy [EN010168/APP/6.3] and Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].
Historic England	Cultural Heritage	<i>Appendix 12.5 and Indicative Layout Drawings</i> There are a number of inconsistencies	No	The results of the archaeological evaluation are provided in Environmental Statement (ES) Volume 3, Appendix 12.4:

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		between Appendix 12.5 and the Indicative Layout Drawings, for example: Area C - A24 to A30 states these will be excluded in the Table but are shown with panels on in the Layout drawings. The significance of this archaeology is not yet reported on. Consequently, we cannot currently provide advice on what mitigation will be needed for these. Area D - A32 is shown with panels over it but this is a significant archaeological feature. - A39 on the Indicative plan is shown in a an open area but in the Table the mitigation is concrete feet. - A5 is along a PROW and green corridor on the Layout Plan. Once the evaluation report and other surveys and assessments have been completed this table and the mitigation proposed needs to be fully revised and		Archaeological Geophysical Survey Report [EN010168/APP/6.3] and Appendix 12.5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]. The results of the archaeological survey have been used to inform ES Volume 3: Appendix 12.6: Archaeological Mitigation Strategy (AMS) [EN010168/APP/6.3]. The AMS identifies a range of different mitigation options including mitigation by preservation (i.e. removal of solar infrastructure, concrete feet) and mitigation by record (i.e. strip, map and sample and archaeological monitoring). A meeting to discuss the archaeological mitigation strategy was undertaken with Wiltshire Council on the 13 August 2025. It was agreed that the AMS will be a flexible document that can be updated following further ongoing discussions after submission.

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		discussed with the LPA Archaeologist. If there is any surviving archaeology of potentially national significance then we will also need to be consulted on the mitigation proposed.		
Hullavington Parish Council	Soils and agriculture	The developments will not avoid elements of the Best and Most Versatile agricultural land (BMV). There has been no attempt to focus a scheme of this size on a combination of brownfield land and grade four agricultural land. Indeed, the current proposal uses over 70 per cent grade 2, 3a and 3b quality agricultural land.	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. Land of Subgrade 3b quality is not BMV. Only 33.5% of the agricultural land is BMV, with a roughly equal proportion of Grade 4 (32.4%). As part of the site selection process ALC grade 1, 2 and 3 land was excluded from the initial search, so that its initial search was focused on suitable and available non-BMV land. Following this, having not identified a suitable and available site the Applicant

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				then went on to consider Grade 3 agricultural land and land within flood zones 2 and 3 within the 20km search area. This search resulted in the identification of the Scheme's location, which outperformed the other potential development areas, and ES Volume 2, Appendix 4-1: Site Selection Assessment Report (SSAR) [EN010168/APP/6.3] concludes that there were no more suitable locations within the search area than the proposed location of the Scheme.
Hullavington Parish Council	Scheme description and DCO process / Cumulative Effects	The current information provided for inclusion in the EIA, ES and DCO submissions appear to not adequately assess alternative locations for these developments. There is lack of clarity on how zones of influence for the cumulative impact assessment have been devised. This has resulted in the scope being insufficient for the overall assessment of the likely massive landscape and visual effects of the developments.	No	The Applicant has followed a step-by-step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution

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				[EN010168/APP/6.1] and Appendix 4-2: Site Selection Report [EN010168/APP/6.3]. The Applicant disagrees that the scope of the landscape and visual cumulative effects assessment is insufficient. The Zone of Influence (Zoi) extents for all technical topics (including Landscape and Visual) are justified within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].
Hullavington Parish Council	Scheme description and DCO process	Summary of the HPC response: (including main findings as they affect the Parish and subjects requiring further work/investigation). • A good number of the extensive surveys required to inform the Environmental Impact Assessment (EIA) have yet to be completed. It is therefore clear that the IGP proposals are far from being fully developed. HPC cannot be confident that the full impacts have been fully captured. It is not possible for HPC to reach a fully considered view on the adequacy of the	No	A full suite of surveys and updated assessments is available within the technical chapters provided within the Environmental Statement (ES) [En010168/APP6.1].

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		Preliminary Environmental Information Report (PEIR) and the proposal as a whole. However, at this early stage there is particular concern around the following aspects.		
Hullavington Parish Council	Scheme description and DCO process	HPC reserve the right to make further representations once the considerable amount of missing information becomes available particularly on: • sequential testing for optimum location. • cumulative impact assessment for 5 x NSIP assessed solar farms being located within the same communities as many existing and consented schemes. • on-site and off-site flooding. • impact on the SPZs • location of the two proposed BESS. • mitigation of construction access impacts. • decommissioning.	No	The Applicant disagrees that the listed information is missing from the Development Consent Order (DCO) application. This information is presented in the Environmental Statement (ES) [EN010168/APP/6.1] in the following: • A sequential test is presented in the Planning Statement [EN010168/APP/7.2]. • Relevant cumulative developments have been assessed in each technical chapter (ES Volume 1, Chapter 7 to 20 [EN010168/APP/6.1]) and summarised in ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]; • The impact of the Scheme on on-site and off-site flooding is considered in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1];

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				• The impact of the Scheme on SPZ is considered in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]; and • The Proposed mitigation and assessment of potential impacts of construction accesses is presented in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3], as well as in the Outline CTMP [EN010168/APP/7.22].
Hullavington Parish Council	Other Environmental Matters (Battery Safety) / Transport and Access	• This proposed second BESS is very poorly served by vehicular access. The road/track access along Down Lane is constrained by the rail bridge with a clear height of 4.1m against the height of a flatbed lorry with standard container of at least 4.2m (plus 0.3m margin for roadway build up and safety). Down Lane floods very regularly where the feeder stream to Gauze Brook crosses the road/track. A proposed alternative emergency and construction access from the A429 is constrained by similar factors. Kingway Bridge has	No	The Applicant maintains that siting the BESS in Lime Down D is entirely appropriate. The Applicant will fully consult with the Fire & Rescue Service (D&WFRS) to ensure that any location selected as a BESS area can be easily accessed by all fire service vehicles in any weather conditions. Access to the BESS in Lime Down D will be taken from the A429. The capacity of the Kingsway Bridge to accommodate construction vehicles has been assessed in

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		insufficient clear height of 4.25m against a minimum recommended clear height for bridges over roads of this classification of 5.03m. As a consequence, this bridge suffers one the highest number of strikes (that close the road) in the county. The A429 is also regularly and completely closed at this point because of complex flooding issues that WC has been unable to resolve over many years. Indeed, after Storm Bert the road was completely closed to all traffic (including emergency vehicles) for over three days. This second proposed BESS site is wholly inappropriate.		Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. which concludes there are no significant adverse impacts as the bridge has a height restriction of 4.2 metres which allows HGV's to pass underneath. Abnormal Indivisible Load (AIL) vehicles are not proposed to be routed via the Kingsway Bridge.
Hullavington Parish Council	Other Environmental Matters (Battery Safety) / Landscape and visual	It is appreciated that an Outline Battery Safety Management Plan is referenced within the documents and is to be submitted with the DCO. In the absence of such a document at this stage, HPC is concerned not only about the siting of the original BESS within the setting of the grade1 listed Bradfield Manor but is now equally concerned with the proposed location of the	Yes	Representative viewpoint photography has been agreed with Wiltshire County Council. The Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1] assesses the effects of the Scheme (including the BESS) from public rights of way (Hull6, Hull7 and Hull8).

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		second, but smaller BESS within area D on Down Lane. This second location is bounded by public rights of way (Hull6, Hull7 and Hull8) yet no viewpoint picks up the effects of this proposed installation in this location. Further viewpoints (41A and B?) should now be considered part way along PROWs Hull7 (the Palladian Way) and HULL8 (following the ridge) so that this potential installation can be adequately assessed for visual and landscape impact along with new impacts from the medium range viewpoints VP 40, 43 and 46.		The key safety objectives of the indicative site design planning, Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas; and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.
Hullavington Parish Council	Landscape and visual	There appears to be no verified visual montages (VVMs) that assess this new potential installation.	No	Verified Photomontages from agreed Viewpoints are included in the Environmental Statement (ES) Volume 2: Baseline photography and Photomontages [EN010168/APP/6.2]

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				The Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] , includes a full assessment of any potential landscape and visual effects associated with development within field D18.
Hullavington Parish Council	Hydrology, flood risk and drainage	It is evident that a significant amount of additional flood modelling and survey work is yet to be undertaken. The recent flooding following Storm Bert on the 23rd and 24th of November 2024 illustrates how this locality is very susceptible to surface water flooding leading to significant flooding problems downstream of the proposed sites in the Avon Catchment at Corston, Malmesbury, The Somerfords, Chippenham, Melksham, and Bradford on Avon. The underlying geology of this locality does not lend itself to more impermeable ground cover from extensive arrays of solar panels and infrastructure as these will further increase downstream flood risk.	No	The vast majority of the Lime Down Solar Scheme is located within Flood Zone 1, indicating a low risk of fluvial flooding. Surface water flood risk has been assessed through a combination of national datasets and site-specific surveys, as reported in Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and detailed in the accompanying site-specific assessments in ES Volume 3 Appendices 11.1 to 11.9 [EN010168/APP/6.3]. The panelled areas will remain vegetated, transitioning from intensively managed farmland to semi-improved grassland or meadow planting. Research by Cook and

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				McCuen (2013) confirms that, where vegetative cover is maintained, solar panels do not significantly increase surface water runoff. Therefore, the development will not reduce permeability or increase flood risk either on site or downstream. Battery Energy Storage Systems (BESS) and substation areas will incorporate sealed drainage systems, typically comprising lined gravel subbases and self-actuating valves. These systems are designed to attenuate flows to greenfield runoff rates, prevent the release of contaminants, and accommodate storm and emergency discharge volumes where required. The relevant technical detail is provided in ES Volume 3 Appendices 11.6 to 11.8 [EN010168/APP/6.3]. Hydraulic modelling has been undertaken at Lime Down D and is ongoing in the vicinity of the Gauze Brook, where flood risk is more complex. This work will inform finished levels, refine flood extents, and

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				ensure the drainage design reflects local catchment behaviour. The outcomes are presented in the ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. Overland flow routes have been mapped and incorporated into the site design to ensure they are preserved. No part of the Scheme has been designed to obstruct existing flow paths or reduce floodplain storage. The Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] also sets out temporary surface water management measures to control runoff during the construction phase. We fully acknowledge the existing flood risk issues in the region, including the risks of surface water flooding during intense rainfall events. The design incorporates measures to prevent exacerbating these existing risks. The development's drainage strategy has been designed to manage

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				surface water runoff effectively, and flood management features will be implemented as required. This ensures that the development does not increase the risk of flooding downstream or affect the surrounding villages.
Hullavington Parish Council	Hydrology, flood risk and drainage	Areas within the proposed development sites comprise land, under which sit two major aquifers (Greater and Inferior Oolite), these are both classed as “vulnerable” and are used for extensive drinking water extraction. To protect these drinking water supplies the Government has designated large expanses of the areas proposed to be developed as Groundwater Source Protection Zones (SPZs). Why in any sequential testing to date of suitable sites has this environmental risk factor not carried more weight?	No	The Applicant acknowledges that parts of the Scheme lie within Groundwater Source Protection Zones (SPZs) associated with the Greater and Inferior Oolite aquifers, which are designated as vulnerable and contribute to public water supply. These constraints have been considered during site selection and design development. The installation of solar PV arrays is not considered a contaminative land use. The transition from conventional agriculture to solar park use will reduce the application of agrochemicals such as fertilisers and pesticides, thereby lowering the potential risk of diffuse pollution to groundwater. For areas of more concentrated infrastructure, such as the Battery Energy

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				Storage System (BESS) and substation sites, embedded mitigation includes sealed drainage systems designed to isolate runoff, including potential firefighting water, from the surrounding environment. These systems are designed to contain flows during emergency events and prevent infiltration, and where required, will incorporate impermeable liners and anchoring. Further detail is provided in the Flood Risk Assessment and Drainage Strategy Appendices [EN010168/APP/6.3]. The development will not result in increased surface water runoff, and infiltration-based drainage is only proposed where appropriate. The approach to drainage and pollution control has been developed in consultation with the Environment Agency (EA) and aligns with the requirements for development within SPZs. Ongoing consultation will ensure that risks to groundwater quality continue to be appropriately managed.

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Hullavington Parish Council	Decommissioning and construction	HPC is concerned about the safeguards for decommissioning the developments in 60 years (or shorter period) as the proposed development corporate entity is an off shore Company not subject to full UK law and discovery/recovery. There appears to be limited restrictions on who may become the ultimate developer/operator/and/or owner. Indeed, there appears to be little to stop a hostile power gaining control which says little for the UK's energy security ambitions. The sums required for decommissioning are vast. HPC is concerned as to the security of these funds and any bonding arrangement that are to be put in place to ensure the necessary funds will be available when required whoever will be the owning/responsible entity at that point.	No	A Development Consent Order (DCO) includes a requirement to decommission the Scheme and return land (including agricultural land) to its original use. Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Further details on how the Scheme will be decommissioned are available in the Outline Decommissioning Strategy (DS) [EN010168/APP/7.13] .
Hullavington Parish Council	Cumulative Effects / Site selection and alternatives	Response to Statutory Consultation.Lime Down Solar Park. PINS ref: EN010168. Overreaching principles: Whilst HPC is not opposed to the principle of the development of solar farms in line	No	The cumulative impact of the Scheme along with other proposed developments (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects

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		with the National Planning Policy Framework, HPC is increasingly concerned about this proposed construction of five individual solar farms in and around its Parish (each very large in its own right) for the following reasons: • The cumulative impact on the Parish of Hullavington of this proposed concentration of five solar parks will lead to increased industrialisation of the countryside and will have profound impacts on the rural way of life in our villages and on undeveloped land that has been farmed by local families since time immemorial. • The existing highway infrastructure within the Parish will be completely overwhelmed during the proposed two-year construction phase. • In light of the obvious and considerable shortcomings of the proposed location for such a vast project, HPC does not believe more suitable sites cannot be found with		[EN010168/APP/6.1]. The Applicant recognises that is the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. It is agreed that agricultural land will be taken out of production temporarily for 60 years. An Outline Construction Traffic Management Plan (CTMP) has been developed to avoid/reduce impacts relating to construction traffic and is contained within Outline CTMP [EN010168/APP/7.22]. The Applicant has followed a step-by-step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites.

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		fewer constraints and with closer connections to the national grid at Melksham. • HPC believe IGP's current technical exercises are seeking to "retrofit" inappropriate proposals into an unsuitable location (primarily because IGP have secured development rights over sufficient land in this particular location) without going through adequate and extensive "sequential testing" to identify far more suitable locations.		More information regarding how the site was selected can be found in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3].
Lea, Garsdon & Cleverton Parish Council	Soils and agriculture	Whilst the Parish Council supports the principle of developing renewable energy resources it objects to the unremitting intensity and extent of this development over a large part of rural north Wiltshire, to the apparent sacrifice of productive agricultural land in preference to seeking innovative brownfield and industrial solutions, and to the unreasonable imbalance between the dis-benefits to be suffered by local communities and rural dwellers in order to generate the benefits	No	Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to

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		principally based on the consumption habits of energy users in urban and peri-urban areas.		avoid BMV land when assessing appropriate sites. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. Section 7.2 of the Statement of Need [EN010168/APP/7.1] explains that the Scheme will connect to the National Electricity Transmission System (NETS) at Melksham. By connecting to the NETS, generation from the Scheme will be

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				transmitted to both local consumers and across the country where it is required. This is a key benefit of the Scheme and helps the UK's electricity system operate efficiently which is a benefit to all consumers, including local consumers, who, through their energy bills, pay for the operational costs of the UK's electricity networks. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths

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				to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds.

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				The Community Benefit Fund is separate from the Development Consent Order (DCO) process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance. The Applicant is in full agreement with guidance published in May 2025 by the Department for Energy Security & Net Zero (DESNZ)'Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure', which sets out that local communities should feel tangible and enduring benefit from their role in creating a low-cost, clean energy system in the UK. Community benefits are already delivered on a voluntary basis around the country,

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				and so the Applicant is confident that this approach is suitable for this Scheme.
Lea, Garsdon & Cleverton Parish Council	Site selection and alternatives	We question why such highly productive agricultural land should be sacrificed to meet the need to develop solar power. The use of locations such as brown field sites, industrial land and buildings, the rooves of large-scale modular storage units and corridor land alongside motorways would be far better at balancing the need for such development against the need to minimise or moderate social and environmental impacts.	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development

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				constraints of these areas. The evaluation involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile (BMV) agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area was then “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. As part of the Site Selection Assessment Report [EN010168/APP/6.3], the Applicant has also considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated

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				inefficiencies involved in connecting multiple small sites.
Lea, Garsdon & Cleverton Parish Council	Scheme description and DCO process	Dear Lime Down Solar Park project team, Please see below Lea, Garsdon & Cleverton Parish Council's feedback in relation to the Lime Down Solar Park consultation: Lea, Garsdon & Cleverton Parish Council's Response to the Consultation in Respect of Lime Down Solar Park Lea, Garsdon and Cleverton Parish Council fully appreciates that the development of renewable energy resources is essential in the battle to mitigate the current impacts of climate change, and that solar energy projects are needed to achieve that. However, the industrial scale of the proposed Lime Down Solar Park Project will have an appalling environmental impact on some of the most beautiful landscapes and secluded parts of north Wiltshire. The	No	The purpose of the Environmental Impact Assessment (EIA) process is to make sure that where we identify any significant effects, we put in place measures to reduce any negative impacts, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the Environmental Statement (ES) [EN010168/APP/6.1] are thorough and have properly considered all impacts.

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		intensity and extent of solar arrays and other equipment will destroy the beauty of this area forever.		
Luckington and Alderton Parish Council	Transport and access	The PEIR offers limited information regarding the transport and access effects of the proposed 'Solar PV sites A to E', BESS installations and 'cable corridors' associated with the Lime Down Solar Park proposals. The local road network consists of narrow, often single-track roads, which are unsuitable for heavy vehicles. The accident statistics are solely based on KSI (killed and seriously injured) and omit any reference data on the numerous minor injury/damage only accidents which are known to occur annually on these roads. The nature of the road network naturally limits speed but makes use by HGV's challenging to say the least. Many of the access roads also feature tight corners, very difficult for HGV's to negotiate without endangering or inconveniencing/intimidating other road users. The roads are not suitable, even with the 'carriageway improvements' proposed	Yes	The effects of the Scheme on Transport and Access are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] . The assessment of road accidents is based on police records and, if an accident is not reported, it is not included within the assessment which is in line with assessment criteria set out within the National Planning Practice Guidance (PPG). Construction vehicle routes selected are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the

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		in the PEIR. It is also disappointing to note that the traffic surveys, on which the report is based, were conducted 23 Jan 2024 to 01 Feb 2024 and again in 13 Sept 2024 to 20 Sept 2024. The area covered by 'Solar PV sites A to E' are a destination of choice for car tours, cyclists, holidaymakers, ramblers, horse riders and other active recreational activities. The area is also close to, and cross-transited by the public, who are attending numerous local large public events, such as Badminton Horse Trials, music festivals (WOMAD) etc. The area comprises of, and is close to numerous large working farms, whose vehicular movements increase dramatically during summer/harvest time. We feel that undertaking traffic surveys in this area in mid-February and mid-September has inevitably resulted in significant under-reporting of traffic volumes, particularly of non-motor vehicle users, and that the figures presented in the PEIR should not be		construction phase on the local highway network is minimised. Traffic surveys which informed the transport and access assessment were carried out during neutral periods within school term time which is in line with criteria set out within the National Planning Practice Guidance (PPG). The Scheme will result in reduced agricultural movements on the local highway network and the Applicant has agreed to commit to no HGV deliveries to Lime Down A, B and C during the five day period of the Badminton Horse Trials to avoid conflicts in traffic.

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		relied upon. We are of the opinion that the figures in the PEIR, due to the timing of the surveys, distorts the true picture regarding local traffic volumes and patterns. This is likely to significantly underrepresent the potential conflicts between site construction/service traffic and other traffic using the roads, and therefore the potential risk for damage or injury accidents/incidents. Therefore, permission for this development should be refused.		
Luckington and Alderton Parish Council	Scheme description and DCO process / Consultation and Engagement	At this time, Luckington and Alderton Parish Council recognises that the developer's application in respect of the proposed Lime Down Solar Park is at the Pre-Application stage, so the comments made by the Parish Council relate solely to the limited, 'indicative' and 'illustrative' information provided by the developer in their PEIR (Preliminary Environmental Information Report). The PEIR lacks detail and clarity around many of the most concerning and contentious aspects of this proposed scheme. These crucial, yet missing details include the proposed panel sizes, individual	No	The Preliminary Environmental Information Report (PEIR) was a snapshot of the Applicant's assessment at that time. The Applicant considers that the amount of information published during statutory consultation was sufficient. The details included within the comment are contained within the following documents: - Proposed panel sizes, individual site footprints and elevation designs are set out in Environmental Statement (ES) Volume

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		site footprints and elevation designs, countermeasures to address concerns over geology, hydrology, flooding, archaeology and management of the construction phase that has frustrated many in the local community. They feel they are being forced to provide feedback, without the necessary and appropriate information being made available to them.		1 Chapter 3: The Scheme [EN010168/APP/6.1]; - Countermeasures (or mitigation) for ground conditions are set out in ES Volume 1 Chapter 19: Ground Conditions [EN010168/APP/6.1]; - Countermeasures (or mitigation) for hydrology and flooding: ES Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]; - Countermeasures (or mitigation) for archaeology: ES Volume 1 Chapter 12: Cultural Heritage [EN010168/APP/6.1]; and - Management of the construction phase in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.11].
Luckington and Alderton Parish Council	Scheme description and DCO process	Environmental considerations We also accounted for instances where respondents specified particular themes of importance in feedback submitted via emails and Freepost. In our feedback form, we asked which aspects of the proposals	No	The Applicant acknowledges that there will be concerns from the local community regarding various environmental matters. The Environmental Impact Assessment (EIA) process is designed to provide a thorough assessment of all potentially

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		mattered to you most. We provided respondents the option to 'tick' from a list of key environmental themes which themes were most important to you, along with a text box for you to add further details. Respondents were also presented with an 'Other' box so they could speak to any other themes or areas of importance. Aspect: Number of respondents concerned: Landscape and visual: 895 Soils and agriculture: 636 Ecology and biodiversity: 619 Hydrology, flood risk and drainage: 593 Noise and vibration: 561 Socio-economics, tourism: 459 and recreation: 398 Cultural heritage: 398 Transport and access: 368 Other: 180 We would suggest that the number of respondents highlighting concerns over these aspects of the developer's proposals is significant, is based on legitimate		significant environmental effects caused by the Scheme. Whilst all practicable measures are taken to avoid impacts and implement adequate mitigation it is recognised that it is not always possible to mitigate all significant effects. A summary of the significant effects remaining post mitigation (residual effects) have been reported on in Environmental Statement (ES) Volume 1 Chapter 22: Summary of Residual Effects [EN010168/APP/6.1]. Whilst the Applicant acknowledges that there will be some potentially significant effects as a result of the Scheme, it is deemed that the community benefits, enhancement opportunities and need for more renewable generation capacity in the UK outweigh the adverse effects. More information on need for the Scheme can be found in ES Volume 1 Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		concerns regarding technical aspects of the proposals, the geology and topography of the local area, and is a community response to well-documented and recurring issues concerning flooding, groundwater and high-volume drinking water extraction from the underlying aquifers in the area.		The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Luckington and Alderton Parish Council	Scheme description and DCO process	Comments regarding PEIR documentation: The PEIR introduction states that, 'owing to it's size, nature and location, the Scheme is likely to have significant effects on the environment'. We agree. Having examined the information offered in the PEIR document (Vols 1 & 2), Tech Appendices (Vol 3), Non-Tech Summary (Vol 4), the 'Maps and Plans' and other supporting documents, the Parish Council has concluded that the proposed Island Green Power 'Lime Down Solar Park scheme' should be refused permission on the following grounds:	No	Detailed responses to the grounds raised by Luckington and Alderton Parish Council are set out below.
Luckington and Alderton Parish Council	Scheme description and DCO process	There are significant fundamental planning issues with demonstrable harmful outcomes, which have not, and cannot, be satisfactorily resolved.	No	The purpose of the Environmental Impact Assessment (EIA) process is to make sure that where we identify any significant effects, we put in place measures to reduce any negative impacts, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the Environmental Statement (ES)

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				[EN010168/APP/6.1] are thorough and have properly considered all impacts.
Luckington and Alderton Parish Council	Scheme description and DCO process	The Lime Down Solar Park Scheme will cause significant detrimental environmental impacts, which have not, and cannot be satisfactorily resolved.	No	The purpose of the Environmental Impact Assessment (EIA) process is to make sure that where we identify any significant effects, we put in place measures to reduce any negative impacts, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the Environmental Statement (ES) [EN010168/APP/6.1] are thorough and have fully considered all impacts.
Luckington and Alderton Parish Council	Scheme description and DCO process	The PEIR offers only 'indicative' and incomplete plans regarding the proposed site layouts for the Lime Down Solar Park Solar PV Sites A to E (inclusive). Consequently, their accuracy cannot be relied on, and they do not adequately address the inevitable environmental, ecological, biodiversity, landscape, visual, hydrological, flood risk, drainage, cultural heritage, transport and access, noise and vibration, air quality or socio-economic, tourism or recreation concerns regarding the proposed sites. These issues have	No	The Preliminary Environmental Information Report (PEIR) is intended to provide a preliminary assessment of the environmental effects of the proposed scheme. The Development Consent Order (DCO) process is designed to be iterative, with multiple phases such as the PEIR and the Environmental Statement (ES) [EN010168/APP/6.1] This phased approach allows statutory stakeholders and the local community to review and engage with the Scheme at various stages, ensuring their feedback is incorporated into

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		been raised previously by the local community in the non-statutory consultation phase, but little tangible progress is evident in the PEIR documentation. Important concerns remain unclear and unanswered. Therefore, permission for this development should be refused.		the design. If the designs were finalised at the PEIR stage, it would limit the Applicant's ability to engage effectively with the community and address their concerns. The final designs, layouts, and assessments are now available in the ES [EN010168/APP/6.1] , which will be the basis for the Secretary of State's decision. We appreciate the concerns raised by the local community during the non-statutory consultation phase and have worked hard to address them in the ES [EN010168/APP/6.1] documentation. We believe the ES [EN010168/APP/6.1] provides a comprehensive and detailed assessment of the environmental impacts caused by the Scheme. Moreover, the public have additional opportunities to engage with the Scheme during Pre-examination and Examination stages of the DCO process. During Pre-

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				examination the public will be able to register with the Planning Inspectorate to become an Interested Party by making a Relevant Representation. A Relevant Representation is a summary of a person's views on an application, made in writing. During examination Interested Parties who have registered by making a Relevant Representation are invited to provide more details of their views in writing. Careful consideration is given by the Examining Authority to all the important and relevant matters including the representations of all Interested Parties, any supporting evidence submitted and answers provided to the Examining Authority's questions set out in writing or posed at hearings.
Luckington and Alderton Parish Council	Scheme description and DCO process	The PEIR offers only vague and incomplete plans regarding the proposed 'cable corridors' for the Lime Down Solar Park connection route to join the National Grid at the Melksham sub-station. Consequently, their accuracy is unreliable, and they do not meaningfully address the inevitable	No	The Preliminary Environmental Information Report (PEIR) is intended to provide a preliminary assessment of the environmental effects of the proposed scheme. The Development Consent Order (DCO) process is designed to be iterative, with multiple phases such as the PEIR and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		environmental, ecological, biodiversity, landscape, visual, hydrological, flood risk, drainage, cultural heritage, transport and access, noise and vibration, air quality or socio-economic, tourism or recreation concerns regarding the proposed 'cable corridors. These issues have been raised previously by the various local community in the non-statutory consultation phase, but little tangible progress or clarity is evident in the PEIR documentation. Important concerns remain unclear and unanswered. Therefore, permission for this development should be refused.		the Environmental Statement (ES) [EN010168/APP/6.1] This phased approach allows statutory stakeholders and the local community to review and engage with the Scheme at various stages, ensuring their feedback is incorporated into the design. The Cable Route Corridor was not finalised at the PEIR stage, as this would have limited the Applicant's ability to engage effectively with the community and address their concerns regarding the route. The final designs, layouts, and assessments are now available in the ES [EN010168/APP/6.1], which will be the basis for the Secretary of State's decision.
Luckington and Alderton Parish Council	Scheme description and DCO process	Conclusion: In respect of the proposed Lime Down Solar Park proposals, there are significant fundamental planning issues which have demonstrably harmful outcomes, and which have not, and cannot, be satisfactorily resolved.	No	The Applicant acknowledges that there will be concerns from the local community regarding various environmental matters. The Environmental Impact Assessment (EIA) process is designed to provide a thorough assessment of all potentially significant environmental effects caused by

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		The Lime Down Solar Park Scheme will cause significant detrimental environmental impacts, which have not, and cannot be satisfactorily resolved. The 'Lime Down Solar Park Scheme' fails to adequately address and mitigate the impact of its large-scale nature on the local environment, adjacent Cotswold Natural Landscape (formerly ANOB) and inadequate local roads and infrastructure. We therefore recommend that the Lime Down Solar Park proposals should be refused.		the Scheme. Whilst all practicable measures are taken to avoid impacts and implement adequate mitigation it is recognised that it is not always possible to mitigate all significant effects. A summary of the significant effects remaining post mitigation (residual effects) have been reported on in Environmental Statement (ES) Volume 1 Chapter 22: Summary of Residual Effects [EN010168/APP/6.1]. Whilst the Applicant acknowledges that there will be some potentially significant effects as a result of the Scheme, it is deemed that the community benefits, enhancement opportunities and need for more renewable generation capacity in the UK outweigh the adverse effects. More information on need for the Scheme can be found in ES Volume 1 Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Luckington and Alderton Parish Council	Noise and vibration	The PEIR offers considerable detail regarding the proposed methods and mechanisms of measuring and analysing noise and the vibrations associated with the proposed 'Solar PV sites A to E', BESS sites and the 'Cable Corridor'. Unfortunately, due to the complete lack of meaningful information in the PEIR relating to the final design, layout, installations, components and mitigation measures to be put in place, it is not possible to assess or evaluate the comments advanced by the developers. Therefore, permission for this development should be refused.	No	The details mentioned in LAPC's comment were unavailable or not finalised at time of writing the Preliminary Environmental Information Report (PEIR) but are now set out within Environmental Statement (ES) Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1], ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and associated supporting figures [EN010168/APP/6.2] and appendices [EN010168/APP/6.3] .
Luckington and Alderton Parish Council	Landscape and visual	Specifically, the 'Lime Down Solar Park Scheme' fails to adequately address and mitigate the impact of its large-scale nature on the local environment, adjacent Cotswold Natural Landscape (formerly ANOB) and inadequate local roads and infrastructure.	No	A Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] , has assessed the effects of the Scheme on the local environment. The LVIA [EN010168/APP/6.1] includes a full assessment of effects on the special qualities of the adjacent Cotswold Natural Landscape in ES Volume 3, Appendix 8.6:

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].
Luckington and Alderton Parish Council	Landscape and visual	The PEIR offers only vague and incomplete plans regarding the 'Landscape and Visual' elements of the proposed Lime Down Solar Park. The viewpoints are yet to be agreed with Wiltshire Council, so any meaningful assessment of potential views, glare and glint are necessarily flawed or impossible. The PEIR confirms that the local countryside, particularly 'Lime Down sites A to E' is characterised by a gentle rolling landscape with long views and few obstructions. It is very difficult to see how the gentle undulating landscape could accommodate solar panels (whether 2m or 4.5m high) and their associated landscaping/planting and BESS infrastructure, without being irrevocably changed and lost. The height of the installations is incompatible with local topography without the irredeemable loss of the characteristic 'Cotswold views and panorama. It has taken hundreds and	No	Viewpoints have been agreed with Wiltshire Council and the Cotswold National Landscape (CNL) Board and are included within the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The layout of the Scheme has changed since the Preliminary Environmental Information Report (PEIR) submission and panels have been removed from the Scheme where incompatible with the receiving landscape. ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.5 [EN010168/APP/6.1] provides an assessment of Glint and Glare effects as a result of the Scheme (for both tracker and fixed panels). This chapter concludes that no significant effects are expected as a result of the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		possible thousands of years to create but could be lost within 2 years if this development is approved. The PEIR lacks detailed and meaningful information to address these areas of concern. These issues resonate very strongly with residents and visitors alike but are still unresolved. Therefore, permission for this development should be refused.		
Luckington and Alderton Parish Council	Hydrology, flood risk and drainage	The PEIR offers only vague and incomplete plans regarding the Hydrological, Flood Risk and Drainage issues associated with the proposed 'Solar PV sites A to E', BESS sites and the 'cable corridors' for the Lime Down Solar Park project. The proposed 'Solar PV sites A to E' are particularly vulnerable to these issues, and this was highlighted in our earlier Environmental Impact Assessment (EIA) response, and the subsequent Planning Inspectorate 'Opinion'. The proposed development area experiences frequent surface water and river flooding events. The underlying aquifers potentially provide drinking water to large parts of southern England.	No	Detailed information on hydrology, flood risk, and drainage is now presented in the submitted Environmental Statement (ES), including Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the associated Flood Risk Assessment and Drainage Strategy reports [EN010168/APP/6.3]. These documents provide a comprehensive assessment of all Solar PV sites (A to E), the BESS sites, and the cable corridors. The updated assessment confirms that the Solar PV sites will transition from arable agricultural use to semi-improved grassland beneath the panels, which improves

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		However, the PEIR lacks any detailed information or proposals to address our concerns regarding surface water drainage, flooding or impacts on the water table and underground aquifers, whether within or outside (downstream) of the proposed 'Solar PV sites A to E' or 'Cable Corridors'. In the absence of this information, permission for this development should be refused.		infiltration and reduces surface water runoff. This is consistent with published research, including Cook and McCuen (2013), which shows that where vegetation is maintained beneath solar arrays, runoff characteristics remain comparable to undeveloped greenfield conditions. The drainage strategy has been designed to ensure that runoff is attenuated to greenfield rates, with no increase in flood risk either on-site or downstream. The design incorporates buffer zones adjacent to watercourses and existing floodplains, which are left undeveloped to preserve natural flow routes and provide space for potential future flood management. For the BESS and substation areas, sealed drainage systems are proposed, with capacity to isolate and contain any contaminated water in the event of a fire or spill. These systems are designed to protect underlying aquifers, including the Secondary A and Principal aquifers in the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				region, which are now clearly identified as sensitive receptors within the ES [EN010168/APP/6.1]. The site-wide approach to flood risk and drainage has been developed in consultation with the Environment Agency and Lead Local Flood Authority, and forms a key part of the application now submitted.
Luckington and Alderton Parish Council	Ecology and biodiversity	The PEIR offers only partial and incomplete information regarding the ecological and biodiversity effects of the proposed 'Solar PV sites A to E' and 'cable corridors' associated with the Lime Down Solar Park proposals. The information offered appears to be based largely on a 'desk-based study' of existing information. It is unclear how much of this information is current rather than historical. Locally, it is viewed as being outdated, under-reported in respect of species diversity and density/sighting frequency. We feel that the information in the PEIR is unreliable and contains insufficient detailed research. It fails to adequately address the ecological issues,	No	A full assessment of potential impacts of the Scheme on ecology and biodiversity is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], including proposed mitigation, compensation and enhancement measures. Data search results are provided in ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3]. It is acknowledged that not all information on ecology was available and/or presented at Preliminary Environmental Information Report (PEIR) stage. The purpose of PEIR is to provide a preliminary assessment of the ecological effects of the proposed

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		which have previously been raised with the developers. Therefore, permission for this development should be refused.		scheme. Ecological surveys were ongoing at PEIR stage but complete and up-to-date ecological data is present in the documents referenced above.
Luckington and Alderton Parish Council	Consultation and Engagement / Community benefits and impact	Since the Stage II Statutory Consultation process has now been conducted without any such offering being advanced or being open to public scrutiny and feedback, one can only conclude that the developer does not wish to truly engage with the public to design such a scheme. If one is later offered in their DCO application, the communities affected will not be able to discuss, shape or tailor it to local needs and existing community organisations, it will simply be a 'take it' or 'leave it' imposition on the local communities. This is a significant missed opportunity but seems consistent with the developer's practice of appearing to engage superficially with local communities, but not meaningfully engaging with the resulting public feedback. The omission of the 'community benefits' element from the	No	Community benefits are not related to the material/ environmental assessments set out in the Preliminary Environmental Information Report (PEIR). The Applicant spoke to Community benefits in other statutory consultation materials, notably the Project Information Booklet and Feedback Form. Questions 12 and 13 of the Feedback Form explicitly prompted respondents to suggest onsite and offsite benefits for the Applicant to consider. A copy of the Project Information Booklet and Feedback Form are provided in Consultation Report Appendix F-3: Statutory Consultation under section 47 of the Planning Act 2008 of the Consultation Report [EN010168/APP/5.2]. The Applicant included the Luckington and Alderton parish district in the core

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		PEIR/Statutory Consultation process has resulted in a lack of tangible wider public engagement and scrutiny. This is likely to undermine the effectiveness and value of any subsequent 'community benefits scheme'. The exclusion of this from Stage II has disempowered the affected communities and denied them the opportunity to participate in shaping their own future. The Parish Council feel that this should have been included within the Stage 2 Statutory Public Consultation (PEIR). The public could then have had the opportunity to engage in such discussions. Failure, by the developer, to do so is a significant lost opportunity, it shows an ill-advised disregard for historical practice and the views of local communities. It does suggest that the developer intends to implement the scheme with scant regard for the views of the local community, or the legacy it leaves behind. Since this scheme is proposed as a 60-year lifetime scheme, with subsequent		consultation zone established for the statutory consultation, therefore all addresses in the area were issued a direct postal notification of the consultation including details on how to participate and find out more about the Scheme at that stage. The Applicant also held an in-person event in the area, at Luckington Village Hall, during the statutory consultation period to support meaningful local participation as the proposals continued to be refined.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		returning of the used land to farmland, it is perhaps, of little surprise that many in the community view the developer's proposals with suspicion and even disbelief.		
Luckington and Alderton Parish Council	Consultation and Engagement	This is a formal response of the Luckington and Alderton Parish Council (LAPC) to the proposed Lime Down Solar Park development. It has been prepared specifically to respond to the developer's Stage 2 Statutory Public Consultation (290125-190325) and PEIR report (Planning Inspectorate Ref: EN010168). The Parish Council has resolved to continue to object to this development, on a specific range of issues, and it is expected that the Parish Council will continue to advance its objections, at the appropriate junctures, as the application process progresses.	No	The Applicant makes note of this comment.
Luckington and Alderton Parish Council	Consultation and Engagement	During the Stage 1 consultation (first phase non- statutory consultation), which took place in early spring 2024, the developer's own Consultation Summary Report (published Oct 2024) indicated that 88% of	No	During the initial non-statutory community consultation, the Applicant included questions in the Feedback Form aimed to understand how members of the local community felt about solar energy in

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		respondents 'did not support' the proposals. feedback from the community to the developer. Only 8% of respondents were supportive of the scheme. In the developer's published 'Consultation Summary Report' (Oct 2024), the areas of this proposed scheme which were of most concern to the public are extracted and shown below:		general, as well as about the early-stage proposals for the Scheme. As stated and shown in the non-statutory Consultation Summary Report, 53% of respondents did not agree with the need to install ground-mounted solar infrastructure, and 88% did not support the proposals at this initial stage in the development process. The Applicant considers this feedback to be important as it helps the Applicant to understand the basis for these concerns and look at how they can be addressed as the Scheme develops further. Further details are provided in Chapter 4: Non-statutory consultation of the Consultation Report [EN010168/APP/5.1]
Luckington and Alderton Parish Council	Consultation and Engagement	Many of the areas in which the detail of the PEIR is poor or completely lacking, mirror those areas identified in the Consultation Summary Report (Oct 2024) as being of most concern to the responding members of the public. This issue has repeatedly been raised with representatives of the developer at the	No	The purpose of Preliminary Environmental Information Report (PEIR) is to provide a preliminary assessment of the ecological effects of the proposed scheme. As such finalised assessments are not provided at PEIR to allow the Applicant time to take on the feedback received at Statutory Consultation and work this into the design envelope to be submitted in the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		sequence of locally held 'Public Consultation Meetings' held as part of the Stage 2 Statutory Public Consultation phase. The consistent reply from these developer's representatives has been, 'that hasn't been completed yet' and 'there will be more details in the application next year'. This leads to the inevitable conclusion that the Stage 2 Statutory Public Consultation has been carried out prematurely, with insufficient detail and information being provided to the public.		Development Consent Order (DCO) application. An Environmental Statement (ES) [EN010168/APP/6.1] has been submitted as part of the DCO Application. This includes Appendices [EN010168/APP/6.3] which detail the results of surveys undertaken to support the Environmental Impact Assessment (EIA). The final designs, layouts, and assessments are now available in the ES [EN010168/APP/6.1], which will be the basis for the Secretary of State's decision. The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the EIA regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Stage Two consultation (which was statutory under section 47 of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				the Planning Act 2008) was carried out in line with commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by section 47 of the Planning Act 2008, the Applicant consulted with Wiltshire Council on a draft of the SoCC, and had due regard to their comments in updating the SoCC for publication ahead of statutory consultation. Chapter 6: Preparation for Statutory Consultation under section 27 of the Planning Act 2008 (Oct 2024 – Jan 2025) of the Consultation Report [EN010168/APP/5.1] describes the process of preparing the SoCC, including the Applicant's consideration of comments received from Wiltshire Council (Table 6-1) and adherence to commitments made in the published SoCC (Table 6-4).
Luckington and Alderton Parish Council	Consultation and Engagement	Whilst the developers have undertaken some consultation within the local communities during (Stage 1) the initial	No	During the non statutory consultation, the Applicant distributed the community consultation leaflet to over 11,400

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		'non-statutory' phase of the Lime Down Solar Park, these did not go well and have failed to include many residents in the process. We understand that LDSP received over 1500 submissions from the community, despite failing to engage with significant sections of the local community who will be directly affected by their proposals.		addresses located within the vicinity of the proposals, and received around 1,300 responses. The core consultation zone established for the statutory consultation comprised over 14,100 addresses, marking an increase of over 2,500 addresses, located within a minimum distance of two kilometres from the boundaries of the five Solar PV Sites and 500 metres from the edge of the Cable Route Search Corridor.
Luckington and Alderton Parish Council	Consultation and Engagement	During Stage 2, the Statutory Public Consultation, which runs from 29th January 2025 to 19th March 2025, the consultation process was much improved. The developer hosted more consultation events within the local communities affected by the scheme, than they had during the Stage 1 consultation period. Advance notice, and the advertising of these meetings was much improved, and meetings were held in the larger population centres, as well as some of the smaller villages, which had been missed out in the Stage 1 consultation. This made the consultation meetings more accessible to a wider section of the affected	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		communities, and all these meetings seem to have been well attended by the public. The developer also implemented a significant postal leaflet drop to the households in the areas affected by the proposed development. This seems to have been very effective and well received.		
Luckington and Alderton Parish Council	Consultation and Engagement	Unfortunately, despite the leaflets, consultation meetings and the developer producing a PEIR document that was only available 'online' (running to over 4000 pages), the consistent absence of tangible detail regarding the most significant aspects of the proposals has proved disappointing and frustrating for the local communities. Simple questions are still unanswered, such as such as 'how tall are the solar panel's going to be'? This approach, utilising the 'Rochdale Envelope' principles, is challenging, as it requires us to use a 'worst case scenario' approach. However, simply changing the size of the proposed panels, or any other material change in design or components, can have a significant impact	No	The Applicant makes note of this comment. Printed reference copies of the Preliminary Environmental Information Report (PEIR) were also available to inspect in person at the community information events and free-of-charge at Community Access Points (CAPs), as advertised in the Applicant's publicity materials. Four CAPs were selected on the criteria of them being in proximity of the Scheme and publicly accessible. Further details are provided in Chapter 7: Statutory Consultation under section 47 of the Planning Act 2008 of the Consultation Report [EN010168/APP/5.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		on the way the local environment is impacted. It is not just a question of scale; it may also fundamentally alter the range of consequences arising from the proposed design or chosen components. The absence of reliable detail has therefore hampered our ability to respond to the consultation process.		
Luckington and Alderton Parish Council	Consultation and Engagement	Few, if any, of the specific concerns raised by the public in the Stage 1 consultation (see previous) have been addressed in any detailed and meaningful way. This has marred the Stage 2 consultation process and has frustrated local communities.	No	Following the review and consideration of feedback received to the Stage One non - statutory consultation, the Applicant prepared a Stage One consultation summary report to share details of the level engagement, themes of responses received, and updates regarding the Applicant's consideration of feedback and next steps for the Scheme. The Applicant published a Stage One Consultation Summary Report on 24 October 2024 to summarise the feedback received during the Stage One consultation and how this feedback was being considered to inform the Project. The Stage One Consultation Summary Report was:

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				• Shared by email and post with key stakeholders (including MPs, councillors and parish councils) and individuals who had registered to be kept informed; • Uploaded to the Project website; and • Wider publicity via a press release, which was sent to over nineteen local publications. This is further detailed in Chapter 4: Non-statutory consultation of the Consultation Report [EN010168/APP/5.1] and a copy of the Stage One consultation summary report is provided in Consultation Report Appendix C-7: Non-statutory consultation [EN010168/APP/5.2]. The feedback received to this round of consultation contributed to the development of the Consultation Report Appendix E: Publication and compliance with the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				SoCC [EN010168/APP/5.2] in preparation for Stage Two statutory consultation. This SoCC was also consulted on and approved by Wiltshire Council. Further information on the development of the SoCC, and how the Applicant complied with commitments set out in it, can be found in the Consultation Report. [EN010168/APP/5.1]. Evidence of the SoCC, including drafts shared with local authorities can be found in Consultation Report Appendix D: Preparation of Statement of Community Consultation (SoCC) [EN010168/APP/5.2] and Consultation Report Appendix E: Publication and compliance with the SoCC [EN010168/APP/5.2]. The Applicant's response to feedback received during Stage Two (statutory) consultation, including those of s42 consultees, can be found in Consultation Report Appendix G-5: Statutory consultation under section 42 of the Planning Act 2008 [EN010168/APP/5.2].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Luckington and Alderton Parish Council	Community benefits and impact	The developer's PEIR is also silent on any proposals to provide 'community benefits' in association with this proposed scheme. Historically, through either s.106 or CIL (Community Infrastructure Levy), the public has been provided some benefits to compensate for the impact of various developments. Despite these historical precedents, no such proposals have been advanced by the developers, this gives the impression that they either do not wish to offer the affected communities any 'benefits' at all, or that if they do, they wish to do so without engaging the community in consultation, and without giving the community the opportunity to shape how any such benefits could be directed to achieve maximum beneficial effects locally. The developers have not offered any proposals in respect of potential or actual community benefits that could arise out of the Lime Down Solar Park development, should it be approved. Perhaps they do not	No	The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		intend to have one?		
Malmesbury Town Council	Scheme description and DCO process / Landscape and Visual	Proposed Objection – Lime Down Solar Park “Malmesbury Town Council is committed to a sustainable future for our town and surrounding area. We have worked extensively with a range of interested parties, including home builders and developers, to ensure sustainability is a key consideration in the development and growth of our town. This has included specific measures, including EV and Solar inclusion for new development. Whilst the above demonstrates our support for the principal of renewable energy, including solar, it is not a blanket approval. In the case of significant solar development, Lime Down Solar Park, this committee strongly opposes the development in principle, as well as several mechanisms around the consultation process. At 11 Square Miles, Lime Down is a	No	The red line boundary of the Scheme contains large areas set aside for mitigation where panels are not proposed. Although the Site is not within the Cotswold National Landscape (CNL) (AONB), it is recognised that Sites A, B and C are within the setting of the CNL. The Scheme will be informed by the Mitigation Hierarchy to prevent/ avoid, mitigate and restore and enhance to avoid significant adverse impacts on the CNL’s landscape and visual character and quality.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		significant development which will have a negative, material impact on both the immediate and surrounding areas, including Malmesbury. We share the concerns of Wiltshire Council relating to the sites current Agricultural Status (30% of which is significantly favourable and versatile arable land), impact on the cherished AONB status of the area and far ranging impact on land health. There is a statutory duty to conserve and enhance national landscapes and this development contradicts this principle.		
Malmesbury Town Council	Consultation and engagement / Socioeconomics, tourism, recreation and health / Other Environmental Matters (Glint and Glare)	Impact to Malmesbury In the most recent round of consultation, residents of Malmesbury were excluded from information provided by Lime Down. This is a blatant and inexcusable omission, with residents metres from the town boundary in Malmesbury St Paul Without included in distribution. We believe the process to date has not provided a rounded view on the impact of visual impact, glare and noise. This committee has already raised and	No	The Applicant included the town of Malmesbury (and the Malmesbury Without Parish district) in the core consultation zone established for the statutory consultation. However, the Applicant notes that there was a mistake in the SoCC (published on 14 January 2025) which was subsequently corrected in the Errata Statement (published 27 January) to show the correct map with the consultation zone, including Malmesbury and Malmesbury Without. The final mailing database for the newsletter evidences that addresses in Malmesbury

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		detailed concerns to Malmesbury directly from this development, which include issues around Traffic, Flooding, Water Run-Off & Health, Emergency Preparedness and Construction Pollutants. One issue that has once again been omitted from consideration is the material impact on Tourism – a sector vital to the economic status of the town. It is also evident no consideration has been given to the Emotional and Physical Health and Wellbeing of residents in the wider community who will suffer from the loss of amenity associated with living in a rural or semi-rural setting. We believe the process to date has not provided a rounded view on the impact of visual impact, glare and noise		were direct mailed the newsletter. Further details are provided in Chapter 6: Preparation for Statutory Consultation under section 47 of the Planning Act 2008 (Oct 2024 – Jan 2025) of the Consultation Report [EN010168/APP/5.1]. The Applicant notes the concerns relating to Malmesbury. Detailed assessments on the topics mentioned can be found in the following locations: Impacts on traffic associated with the Scheme and proposed mitigation are set out Environmental Statement (ES) Volume 1 Chapter 13: Transport and Access [EN010168/APP/6.1]; Flooding, Water and Run-Off is addressed in ES Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]; Impacts on mental health and wellbeing are

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				assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This assessment covers a 2km Study Area within which these impacts are anticipated to be experienced most. Malmesbury town falls outside this area, although parts of Malmesbury St Paul Without parish do (such as Corston and Rodbourne) and thus mental health and wellbeing impacts on these communities have been assessed. This includes specific assessment of the impact of the Scheme on community identity and culture, and the likely mental health impacts of changes to these. Priority has been given in the assessment to the communities most immediately affected by changes to their visual and landscape setting. Chapter 18 concludes that no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. Emergency Preparedness is set out in ES

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				Volume 1 Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1] and Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21]; Construction Pollutants is set out in ES Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], Chapter 14: Noise [EN010168/APP/6.1] and Chapter 15: Air Quality [EN010168/APP/6.1]; and A detailed assessment of likely significant effects from the Scheme on the use and desirability individual PROWs, tourism destinations such as in and surrounding Malmesbury, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on

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				individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations and events, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. The Applicant appreciates that these chapters contain a high level of detail. A non-technical summary of the conclusions of these assessments can be found in ES Volume 6.4, Non-Technical Summary [EN010168/APP/6.4]. The purpose of the Environmental Impact Assessment (EIA) process is to make sure that where we identify any significant effects, we put in place measures to reduce any negative impacts, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the ES [EN010168/APP/6.1] are thorough and have properly considered all impacts.

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Malmesbury Town Council	Consultation and engagement	Summary Our opposition to the Lime Down Solar Park stands, as does our call for a robust consultation process with local stakeholders. Many of the points raised above have yet, in our opinion, to be comprehensively considered and we would support Wiltshire Council's call for a supplementary public consultation."	No	The Applicant believes that the Scheme has been robustly consulted on and that the areas of concern and any significant effects raised by Malmesbury Town Council have been robustly considered in the Environmental Statement (ES) [EN010168/APP/6.1].
Marine Management Organisation (MMO)	Ecology and biodiversity / Hydrology, flood risk and drainage	Marine Licensing: Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Applicants should be directed to the MMO's online portal to register for an application for marine licence:	No	The Applicant has reviewed the MMO guidance as well as the Marine and Coastal Access Act 2009 and can confirm that the Order Limits do not fall within the MMO jurisdiction (i.e. below the mean high water mark) and therefore a marine licence is not required for the Scheme. Protected marine species are not expected to be impacted by the Scheme and therefore no requirement for wildlife licences for marine species are anticipated.

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		https://www.gov.uk/guidance/make-a-marine-licence-application You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters. The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a UK or European protected marine species. The MMO is a signatory to the coastal concordat and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should check if a marine licence is needed and quote the		

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		following information on any resultant marine licence application: - local planning authority name; - planning officer name and contact details; and - planning application reference. Following submission of a marine licence application, a case team will be in touch with the relevant planning officer to discuss next steps.		
Marine Management Organisation (MMO)	Ecology and biodiversity / Hydrology, flood risk and drainage	EIA: With respect to projects that require a marine licence the EIA Directive (codified in Directive 2011/92/EU) is transposed into UK law by the Marine Works (Environmental Impact Assessment) Regulations 2007 (the MWR), as amended. Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR. In cases where a project requires both a marine licence and terrestrial planning	No	The Applicant has reviewed the MMO guidance as well as the Marine and Coastal Access Act 2009 and can confirm that the Order Limits do not fall within the MMO jurisdiction (i.e. below the mean high water mark) and therefore a marine licence is not required for the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations may be applicable. If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link: https://www.gov.uk/guidance/make-a-marine-licence-application		
Marine Management Organisation (MMO)	Ecology and biodiversity / Hydrology, flood risk and drainage	Marine Planning: Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if the authority takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and	No	The Applicant has reviewed the MMO guidance as well as the Marine and Coastal Access Act 2009 and can confirm that the Order Limits do not fall within the MMO jurisdiction (i.e. below the mean high water mark) and therefore a marine licence is not required for the Scheme. The Order Limits do not intersect with any area covered by a Marine Plan.

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		decision-making processes. Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. A map showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our Explore Marine Plans		

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		service. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to.		
Marine Management Organisation (MMO)	Ecology and biodiversity / Hydrology, flood risk and drainage	Minerals and waste plans and local aggregate assessments: If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend that reference to marine aggregates is included. Reference should also be made to the documents below: - The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry. - The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. - The Managed Aggregate Supply System	No	The Applicant has reviewed the MMO guidance as well as the Marine and Coastal Access Act 2009 and can confirm that the Order Limits do not fall within the MMO jurisdiction (i.e. below the mean high water mark) and therefore a marine licence is not required for the Scheme and as such the consulting process referred to does not need to be followed. The Applicant is not consulting on a mineral/waste plan or local aggregate assessment. Nonetheless, marine aggregates are not relevant to the Development Consent Order (DCO) Application. Matters related to non-marine aggregates are set out in Minerals (Section

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		(MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. - The national and regional guidelines for aggregates provision in England 2005-2020 which predicts likely aggregate demand over this period, including marine supply. The NPPF-informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained. If you require further guidance on the marine licensing process, please follow the link: https://www.gov.uk/topic/planning-development/marine-licences		20.3) and Materials and Waste (Section 20.4) of Environment Statement (ES) Volume 1, Chapter 20 Other Environmental Matters [EN01068/APP/6.1]. The Marine Policy Statement and National Planning Policy Framework are addressed below. In terms of the Marine Policy Statement, marine policy documents cover licensable development within the marine area and areas involved in fishing and shipping that are not subject to a marine licence. Neither such areas are within or adjacent to the Order Limits and therefore are not affected by the Scheme, therefore the Marine Policy Statement is not relevant to the Scheme. The relevant policies from the National Planning Policy Framework are considered in Annex A National Policy Accordance Tables of the Planning Statement [EN010168/APP/7.1].

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Melksham Without Parish Council	Scheme description and DCO process	Melksham Without Parish Council resolved when they met as a Planning Committee on Monday 17th March 2025 to fully and wholeheartedly support the submission by CAWS to the second stage of statutory consultation regarding the Lime Down Solar Park project.	No	The Applicant notes this comment and thanks Melksham Without Parish Council for its response.
Melksham Without Parish Council	Cumulative Effects	Community Action: Whitley and Shaw (CAWS) have outlined their role representing residents and businesses and have kept the Parish Council fully informed and updated of the engagement work they have undertaken and the concerns that have been raised. The Parish Council agree and support the request for further public consultation once the cable routes have been established. They also support the concerns about the potential impact on the local communities in the parish – Beanacre, Whitley and Shaw particularly during the construction and eventual operation. There is already a lot of	No	The cumulative impact of the Scheme along with other proposed developments in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. This includes consideration of Wick Solar Farm (244 in the cumulative short list) as well as other solar developments being progressed in the surrounding area. The chapter concludes the only potentially significant cumulative effects resulting from the Scheme interacting with others are on the Landscape 1km Study Area during construction and year 1 of operation and to

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		construction work being undertaken to upgrade the substation on Westlands Lane, the BESS sites adjacent to the substation and the commencement on site of Wick solar farm, and it making a severe impact to residents of Westlands Lane and Whitley from noise vibration, displaced wildlife (deer running across the road), mud and gravel on the road, rubbish accumulating, degradation of the road surface and lorries continuously ignoring the construction management plans and using the route to sites via the busy A350 and weight limit bridge. This has involved Planning Enforcement, Public Protection, Environmental Health and Highway Officer interventions by Wiltshire Council staff. There is a current planning application for a new shunt reactor at the substation by National Grid and works planned to refurbish the overhead pylons by Balfour Beatty. In addition, a planning application for land at Middle Farm for some 22		the following tourism and recreation receptors during construction: Corsham Park, Footpath WT HULL 29, byway WT CORM 122, Sustrans Cycle Route 403 and White Walls Way. Both these effects are temporary in duration being intrinsically linked to the construction phase. While the scheme does give rise to two cumulative effects, this outcome is notably restrained given its scale and complexity. At 500 MW, it represents a substantial infrastructure project, and yet its cumulative footprint remains limited — a reflection of careful site selection, embedded mitigation, and design sensitivity. A full Environmental Impact Assessment (EIA) has been prepared including an assessment on noise and vibration, ecology and biodiversity and transport and access. Details can be found in ES Volume 1 [EN010168/APP/6.1]: Chapter 14: Noise and Vibration;

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		dwellings, on the corner of Corsham Road and Westlands Lane.		- Chapter 9: Ecology and Biodiversity; - Chapter 13: Transport and Access; and - Chapter 20: Other Environmental Matters, Section 20.3 Materials and Waste Mitigation measures to avoid or limit impacts on the local community are contained within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] and the Outline Site Waste Management Plan [EN010168/APP/7.16]. It should be noted the management plans are secured via the Development Consent Order (DCO) requirements and as such will be legally binding documents.
Melksham Without Parish Council	Consultation and engagement	To this end, the requests for continued engagement with the local community who have a good understanding of the local picture and projects ongoing and in the pipeline is essential to lessen the impact of these developments on the people who live	No	The Applicant makes note of this comment. The Applicant has engaged with the local community and stakeholders, including with Melksham Without Parish Council and CAWS, throughout the pre-application process and is committed to continuing this

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		close by; this to be done through CAWS and the Parish Council.		engagement, ensuring that communication channels remain open and accessible as the Scheme progresses.
Melksham Without Parish Council	Community benefits and impact	I attach the CAWS submission to this email, so its together for completeness, but they made their own separate submission yesterday. The impact of this proposed scheme on the local community, as well as the hydrology, ecology and heritage aspects, is reflected in the requests for community benefits too. The Parish Council support the issues raised under these topic headings, and the community benefit requests.	No	Comment noted. The Applicant has provided a detailed response to CAWS submission, including relating to hydrology, ecology and heritage aspects and the requested community benefits within Consultation Report Appendix F-7: Statutory consultation under Section 47 of the Planning Act 2008 [EN010168/APP/5.2]. The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds.
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals: NGT has 1 feeder main located within or in proximity to the Order limits. Details of this infrastructure is as follows: ▪ Feeder Main – FM14 – Wormington to Pucklechurch ▪ Cathodic Protection Groundbeds/TR ▪ Ancillary apparatus Please note that NGT has existing easements for these pipelines which provide rights for ongoing access and prevent the erection of permanent / temporary buildings/structures, change to	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform it of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1]. The Applicant confirms the Scheme will abide by National Gas Transmission Guidance for working in proximity of high pressure pipelines. This is specifically referenced in Environmental Statement (ES) Volume 1, Chapter 20: Other Environmental Matters, Section 20.4 Telecommunications, Utilities and Television [EN010168/APP/3.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		existing ground levels or storage of materials etc within the easement strip. The Applicant should also be aware of NGT's guidance for working in proximity to its assets.		
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1].

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National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	Installations which have the potential to interfere with National Gas Transmission's cathodic protection system include (but are not limited to): 1. High voltage cable crossings and parallelism 2. High voltage ac pylon parallelism 3. Battery Energy Storage Systems 4. Third party pipelines with cathodic protection systems 5. PV Solar arrays Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx. Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access)Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice GuideUKOPA Good Practice Guide (hold ctrl and click to access)	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1]. The Applicant is aware of the 'UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1' guidance and will ensure this is applied during the detailed design stage.

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		The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.		
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	The Applicant should be aware of the specific guidance for developing solar farms near to gas transmission pipelines: https://www.nationalgas.com/document/82936/download UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1 Where the Applicant intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1]. The Applicant is aware of the 'UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1' guidance and will ensure this is applied during the detailed design stage.

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		discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.		The Applicant is committed to ongoing engagement with NGT, including discussions regarding protective provisions and the Deed of Consent.
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	Key Considerations: • NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc. • Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore, a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team. • Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1]. The Applicant is committed to ongoing engagement with NGT, including discussions regarding protective provisions and the Deed of Consent. The Applicant confirms that the Scheme will not result in any change in population increase in the vicinity of a high pressure pipeline.

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		methodology, and the HSE response should be submitted to National Gas Transmission for review. • All works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.		
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	On pipeline safety: • The Applicant should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's "Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets". There will be additional requirements dictated by NGT's plant protection team. • NGT will also need to ensure that its pipelines remain accessible during and after completion of the works. • Our pipelines are normally buried to a	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1]. The Applicant is aware of the "Avoiding Danger from Underground Services", and "Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets" guidance documents and confirms these measures will be in place at all phases of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased. • If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline. • Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets, therefore consultation with NGT's plant protection team is essential:		the Scheme. This is set out in Environmental Statement (ES) Volume 1, Chapter 20: Other Environmental Matters, Section 20.4 Telecommunications, Utilities and Television [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		▪ Demolition ▪ Blasting ▪ Piling and boring ▪ Deep mining ▪ Surface mineral extraction ▪ Landfilling ▪ Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.) ▪ Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent. ▪ Solar farm installation ▪ Tree planting schemes		
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	Traffic crossings: • Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations. • Permanent road crossings will require a surface load calculation, and will require a deed of consent.	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required. • The type of raft shall be agreed with NGT prior to installation. • No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT. • NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure. • The method of installation shall be confirmed through the submission of a		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		formal written method statement from the contractor to NGT. • An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22.		
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	New Asset Crossings: • New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees. • The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres. • A new service should not be laid parallel within an easement strip. • Clearance must be at least 600mm above or below the pipeline. • An NGT representative shall approve and supervise any cable crossing of a pipeline. • A Deed of Consent is required for any cable crossing the easement.		
National Gas Transmission (NGT)	Other Environmental Matters (Utilities)	Where the Applicant intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement	No	Comment noted. The Applicant has engaged with National Gas Transmission (NGT) to inform them of the proximity of the Scheme to the pipeline and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		for objection. Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.		
National Grid Energy Distribution	Other Environmental Matters (Utilities)	NGED's objective is to secure protection of its assets and agreement on any diversions or works necessary to facilitate the development. In doing so it will expect the Development Consent Order to include protective provisions specific to NGED. We suggest that the Applicant considers NGED-specific protective provisions secured on other DCO schemes including: • The West Burton Solar Project Order 2025 • The Gate Burton Energy Park Order 2024 • The Cottam Solar Project Order 2024 • The Mallard Pass Solar Farm Order 2024 In addition, NGED will usually expect the developer to enter into an Asset Protection Agreement. We would encourage you to engage with NGED in respect of the terms	No	Comment noted. The Applicant has engaged with National Grid Energy Distribution (NGED) to inform them of the proximity of the Scheme to their assets and to confirm all the relevant Protective Provisions / easements are in place prior to the submission of the Development Consent Order (DCO). These are included within the Draft DCO [EN010168/APP/3.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		of this agreement. NGED's general position on DCO schemes is to submit a holding objection to the scheme until the above requirements have been secured. This objection does not mean that NGED object in principle to the proposed development. We have not undertaken an audit of NGED's assets that may be affected by the development and the above response does not take into account any specific engagement you may have directly with NGED's local offices. Should you be proposing any diversionary works to NGED's assets that require land outside of the proposed Order limits we suggest you consider engaging with NGED on any land rights required to undertake those diversions prior to submission of your application.		
National Grid Energy Transmission (NGET)	Scheme description and DCO process / IGP	Due to the proximity of some of our existing or future assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being	No	The Applicant makes note of this comment. The Applicant will continue to engage with National Grid Energy Transmission (NGET). The appropriate Protective

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		assessed. Where the Applicant intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussion on the impact to its apparatus and rights. NGET assets form an essential part of the electricity transmission network in England and Wales. Please continue to consult NGET in regards to this development. NGET will require an adequate form of Protective Provisions included within the Order.		Provisions are in discussion and will be included within the Development Consent Order (DCO).
National Grid Energy Transmission (NGET)	Scheme description and DCO process / IGP	Existing Infrastructure Substation: • MELKSHAM 400 kV Sub Station • MELKSHAM 275 kV Sub Station	No	The comment is noted. The Applicant has a connection agreement with NESO for a connection at Melksham 400kV substation with reference A/IGP15/21/2302/1EN(1). It is not confirmed within this agreement the exact location of the bay the Applicant will be connecting into. Therefore, it cannot be

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• MELKSHAM 132 kV Sub Station • Associated overhead and underground apparatus including cables Overhead Lines: • ZG 400 kV OHL HINKLEY POINT - MELKSHAM 1 HINKLEY POINT - MELKSHAM 2 • 4YX 400 kV OHL MELKSHAM - SEABANK IMPERIAL PARK – MELKSHAM • ZF 400 kV OHL MELKSHAM - MINETY 1 MELKSHAM - MINETY 2 • YYM 400 kV OHL BRAMLEY - MELKSHAM 1 BRAMLEY - MELKSHAM 2 • XL 275 kV OHL IRON ACTON - MELKSHAM 1		confirmed the final interaction with existing infrastructure at the Melksham 400kV substation and its immediate surrounding infrastructure. However, this information has been requested by the Applicant to the its Customer Account Manager (CAM) at NGET and the Applicant will engage with NGET in this manner on a continuing basis. It is also noted by the Applicant that as part of the Bilateral Construction Agreement (BCA) it has signed that it commits to agreeing an Interface Agreement for any interactions within NGET's operational land.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		IRON ACTON - MELKSHAM 2 Cable Apparatus: • MELKSHAM - THINGLEY: 33 kV Commissioned Cable. MELK4 THIJ3R2 K1 01		
National Grid Energy Transmission (NGET)	Scheme description and DCO process / IGP	New Infrastructure Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network: https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd NGET requests that all existing and future	No	The comment is noted. The Applicant is currently not aware of any new infrastructure planned that would interact with the Proposal. However, it will continue to engage with NGET via the Applicant's Customer Account Manager (CAM) and via NESO publications including TCSNP and following CSNP, which it is understood to have replaced the HND and NOA publications.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the Applicant in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the proposed DCO. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network		If the Applicant learns of any interactions it will engage with NGET at the earliest opportunity.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and infrastructure webpage: https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that the Applicant's project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity. These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.		
National Grid Energy Transmission (NGET)	Project description and DCO process / IGP	Electricity Infrastructure: - National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset.	No	The Applicant does not intend to construct any permanent structures beneath or in close proximity to any existing NGET overhead lines (OHL). The Applicant acknowledges the guidance documents referenced in the response and confirms that all planned works interacting with

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”, which is publicly available. - If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances. - The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive’s (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger		existing infrastructure are expected to fall within those guidelines. Engagement with NGET will continue through both the electrical and land teams, to assess any potential impacts and to ensure full compliance with the stipulated guidance, including the six-step process for agreeing land rights.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance. - Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worst conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained.. - If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances. - Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings should be obtained. - National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place. - Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.		
National Highways	Transport and access	National Highways has been appointed by the Secretary of State for Transport as 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 National Highways works 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. Our comments therefore relate to matters arising from our responsibilities to manage and maintain the M4 motorway including junctions 17 and 18 in this case. Having reviewed the information currently available, which includes a Preliminary Environmental Information Report (PEIR),	No	An assessment of likely significant transport and access effects on the Strategic Road Network (SRN), including Junction 17 and 18 of the M4, is set out in Section 13.10 of Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] . The latest design and parameters for the Scheme are confirmed in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		we understand that the scheme comprises of a series of Solar Arrays across approximately 900 ha within sites identified as Lime Down A to E, a number of 33kV and 132kV substations located within the Solar Array sites, a BESS, up to two 400kV substations, and interconnecting cables. The point of connection for the scheme to the National Grid is at the existing 400kV Melksham Substation. The scheme will be linked to Melksham Substation via underground cables within a Cable Route Corridor. A Cable Route Search Corridor Study Area is indicated but the route remains under consideration and subject to environmental assessments, landowner negotiations and consultation input. The scheme is expected to operate for 60 years, with batteries and solar panels likely to require replacement at least once during this period. Subject to the DCO process, construction could commence in 2027 with the site operational by 2029.		
National Highways	Transport and access	It is acknowledged that the primary traffic impact will be during the construction phase	No	Construction vehicle movements will be managed through a Construction Traffic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		which is anticipated to last for 24 months. All construction vehicles will route to the sites via the M4 at either junction 17 or 18. The PEIR predicts average daily two-way vehicle movements in the order of M4 J18 - 237 (of which 45 HGVs) M4 J17 - 224 (of which 58 HGVs) On the basis that the traffic impact represents a low percentage increase in M4 vehicle flows, the applicant is not proposing to undertake any further assessment of traffic impacts for the SRN. It should be noted that National Highways would not usually accept percentage-flow changes as a measure of traffic impacts on the SRN, but it is recognised that the impact will be temporary for the construction period only. However, both junctions (particularly J17) experience peak-hour congestion and we will expect construction traffic management measures which aim to reduce network peak hour construction vehicle movements. We welcome that you have already sought		Management Plan (CTMP) which will be in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the Strategic Road Network (SRN) and local road network are minimised. Engagement with National Highways regarding the Scheme has been undertaken throughout the pre-application stage and will continue through the post-application stages.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		engagement with National Highways with regards potential abnormal load movements, but further engagement will also be required with our South West Network Occupancy team to agree any specific SRN measures prior to their implementation (eg signing). We look forward to reviewing the proposed Construction Traffic Management Plan in due course.		
National Highways	Transport and access	National Highways has been appointed by the Secretary of State for Transport as 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 National Highways works 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. Our comments therefore relate to matters arising from our responsibilities to	No	An assessment of likely significant transport and access effects on the SRN, including Junction 17 and 18 of the M4, is set out in Section 13.10 of Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] . The latest design and parameters for the Scheme are confirmed in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		manage and maintain the M4 motorway including junctions 17 and 18 in this case. Having reviewed the information currently available, which includes a Preliminary Environmental Information Report (PEIR), we understand that the scheme comprises of a series of Solar Arrays across approximately 900 ha within sites identified as Lime Down A to E, a number of 33kV and 132kV substations located within the Solar Array sites, a BESS, up to two 400kV substations, and interconnecting cables. The point of connection for the scheme to the National Grid is at the existing 400kV Melksham Substation. The scheme will be linked to Melksham Substation via underground cables within a Cable Route Corridor. A Cable Route Search Corridor Study Area is indicated but the route remains under consideration and subject to environmental assessments, landowner negotiations and consultation input. The scheme is expected to operate for 60 years, with batteries and solar panels likely to		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		require replacement at least once during this period. Subject to the DCO process, construction could commence in 2027 with the site operational by 2029.		
Natural England	Ecology and biodiversity	Dear [REDACTED] Planning consultation: Lime Down Solar Park - Consultation in accordance with Section 42 'Duty to Consult' of the Planning Act 2008 and Regulation 13 'Pre-application publicity under Section 48 (Duty to publicise) of the Infrastructure Planning Environmental Impact Assessment Regulations 2017 Thank you for your consultation on the above dated 24 January 2025, which was received by Natural England on the same day. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		development. Natural England's comments relating to the Public Consultation and the Preliminary Environmental Information Report (PEIR) are given below:		
Natural England	Ecology and biodiversity	Nationally and Internationally Designated Sites Internationally Designated Sites Due to the potential impact of the proposed development on internationally designated sites, the Habitats Regulations Assessment will be required for the DCO. We acknowledge that this is recognised in the PEIR and a HRA report will accompany DCO submission. Bath and Bradford on Avon Bats SAC Areas of the development site are located within and in close proximity to the Core Areas for the Bath and Bradford on Avon Bats SAC identified in the Bat Special	No	A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC which concludes the Scheme will not have significant effects on the designated site. A full assessment of potential impacts of the Scheme on bats is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], and detailed bat survey results are presented in ES Volume 3, Appendix 9.3: Bat Survey Report [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Areas of Conservation (SAC) Planning Guidance for Wiltshire (Wiltshire Council, September 2015). Namely, Lime Down C is directly adjacent to the lesser horseshoe bat Core Area, the land at Melksham Substation is in close proximity to the lesser horseshoe and greater horseshoe Core Areas, the Cable Route Search Corridor is within or in close proximity to the Core Areas in a number of places. The Core Areas are located around Core Roosts for the SAC. The Wiltshire guidance defines Core Roosts as: Core Roosts must support qualifying species and meet the relevant SSSI criteria as follows: • breeding or winter roosts containing 50+ adult greater horseshoe bats; and/or, • breeding roosts containing 100+, or winter roosts containing 50+ adult lesser horseshoe bats; and/or, • any traditional breeding roosts of		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		barbastelle and Bechstein's bats. In addition to the above criteria, a Core Roost must: a) be a component site of an SAC designation; or, b) have an established demographic connection with a SAC population; or, c) be judged as having a likely demographic connection with a SAC population based on proximity, landscape connectivity and expert opinion . Core Areas are based on a buffer zone around the Core Roosts which are defined by the typical distance the SAC bat species are known to travel from their roosts for commuting and foraging. The buffer zones defined in the guidance for each bat species which are qualifying features of the Bath and Bradford on Avon Bats SAC are: • 4km around greater horseshoe Core Roosts • 2km around lesser horseshoe Core Roosts		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• 1.5km around Bechstein's core roosts The Core Areas provide an indication of the key areas of foraging and commuting habitat for SAC bat species.		
Natural England	Ecology and biodiversity	Lime Down C is directly adjacent to a lesser horseshoe Core Area. Bat surveys undertaken to date indicate that Lime Down C is well used by lesser horseshoe bats. It is noted that bat surveys at Lime Down C are ongoing, therefore a full understanding of how the site is used by lesser horseshoe bats is not yet possible, however survey results to date indicate the site is functionally linked to the Bath and Bradford on Avon Bat SAC. To aid in assessing the importance of Lime Down C to lesser horseshoe bats, results of bat surveys should be presented in more detail in the final reports with the total number of lesser horseshoe bat calls recorded at each detector in each month of the year presented. Analysis of the timings of lesser horseshoe bat calls	No	Detailed bat survey results, including detailed analysis of lesser horseshoe bat calls at Lime Down C, are presented in Environmental Statement (ES) Volume 3, Appendix 9.3: Bat Survey Report [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		recorded at this site should also be presented.		
Natural England	Ecology and biodiversity	Whilst survey results indicate Lime Down C is functionally linked to the SAC, the potential for the proposed development to adversely impact lesser horseshoe bat habitat is limited. Our understanding is that current research on the impacts of solar farms on bats has not shown significant impacts on lesser horseshoe bats, therefore provided that suitable habitat for the species is retained in the development the potential for adverse impacts to lesser horseshoe bats at this location is limited.	No	A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC which concludes the Scheme will not have significant effects on the designated site. A full assessment of potential impacts of the Scheme on bats is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .
Natural England	Ecology and biodiversity	Further, bat surveys indicate that the land at Melksham Substation is well used by lesser horseshoe bats and, to a lesser extent, greater horseshoe bats. Again, the survey results presented to date indicate that the site is functionally linked to the Bath and Bradford on Avon Bats SAC however a breakdown of the number of bat calls recorded of each species, on each detector in each month of the year and the timings of	No	Noted. Following the preliminary assessment work presented in the Preliminary Environmental Information Report (PEIR), the area near Whitely proposed for potential BESS development (referred to as Land at Melksham Substation within the PEIR) is no longer proposed for BESS. Whilst part of this area is included within the Cable Route Corridor, there would be no permanent loss of habitat as a result of the Scheme. A Habitats

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		recorded calls should be provided to assess this further.		Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC. A full assessment of potential impacts of the Scheme on bats is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .
Natural England	Ecology and biodiversity	A majority of the habitats recorded at the Melksham Substation site are not highly suitable for either greater or lesser horseshoe bats, with much of the site comprising cereal crops. Development in this area should retain commuting routes across the site and avoid indirect impacts such as light spill to adjacent woodland and hedgerows. Mitigation will need to be provided for if suitable habitat is lost to development.	No	Noted. Following the preliminary assessment work presented in the Preliminary Environmental Information Report (PEIR), the area near Whitely proposed for potential BESS development (referred to as Land at Melksham Substation within the PEIR) is no longer proposed for BESS. Whilst part of this area is included within the Cable Route Corridor, there would be no permanent loss of habitat as a result of the Scheme. A full assessment of potential impacts of the Scheme on bats is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Natural England	Ecology and biodiversity	Sections of the Cable Route Search Corridor are within and adjacent to the Core Areas. Full details have not yet been provided of the habitats present within the search area, expected working methods, and avoidance or mitigation measures which will be used therefore a full assessment of the potential impact of the proposed cable route on the Bath and Bradford on Avon Bats SAC is not possible at this time.	No	Noted. A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC. A full assessment of potential impacts of the Scheme on bats is provided within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .
Natural England	Ecology and biodiversity	Severn Estuary SAC & SPA On the basis on the information provided, we agree that the development site is unlikely to be functionally linked to the Severn Estuary SAC & SPA. We agree that due to the distance between the designated site and the development site in addition to the embedded mitigation measures, adverse effects on the designated site as a result of pollution are unlikely.	No	The Applicant makes note of this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Natural England	Ecology and biodiversity	Severn Estuary Ramsar We note that the potential for the development site to be functionally linked to the Ramsar has been raised due to the potential presence of eels in suitable habitat on site. Full details on the extent and scope of watercourse crossings have not yet been provided therefore an assessment of the potential impact of the proposed development on eels is not possible at this stage.	No	The Applicant makes note of this comment. A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Severn Estuary Ramsar. A full assessment of potential ecological impacts of the Scheme on watercourses and associated species, including eels, is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].
Natural England	Ecology and biodiversity	Nationally Designated Sites Harries Ground, Rodbourne SSSI Based on the information presented to date, we agree that adverse impacts on the SSSI are unlikely. To inform the final assessment, a full list of species recorded in grassland present on site should be provided to ascertain if devils bit scabious is present within the development site. Further, historic records of devils bit scabious and marsh fritillary within the	No	The Applicant makes note of this comment. Full botanical quadrat data for the Scheme is provided in the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8], with no devils bit scabious recorded within any grassland at the Order Limits. Data search results are presented in Environmental Statement (ES) Volume 3, Appendix 9.1: Ecological Baseline Report [EN010168/APP/6.3], and have been considered to inform proposed ecological enhancements within the Sites.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		landscape in proximity to the development site should be presented to inform the nature and location of ecological enhancements to be provided across the development site.		
Natural England	Ecology and biodiversity	Other National Statutory Designated Sites Based on the information presented in the PEIR, we agree that significant adverse effects on other national statutory designated sites are unlikely.	No	The Applicant makes note of this comment.
Natural England	Ecology and biodiversity	Protected Species We note that further species-specific surveys in addition to assessments of the impact of final development design on protected species are currently being undertaken and will be used to inform the Environmental Statement, as well as any required protected species licence applications. Natural England has published Standing Advice on protected species. Whilst this advice has been primarily designed to	No	The Applicant makes note of the Standing Advice from Natural England. With the exception registering the Scheme under the District Level Licencing scheme for Great Crested Newts (for which the Pre-Submission Screening Service does not apply), there are no other protected species licence known to be required at the submission stage.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		assist Local Planning Authorities better understand the information required when assessing the impacts of developments on protected species, it also contains a wealth of information to help applicants ensure their proposals comply with best practice guidelines and contribute to sustainable development. We would refer you to our standing advice for further guidance on information that may be required in terms of survey and mitigation requirements. The Standing Advice should not, however, be treated as giving any indication or providing any assurance that the proposed development will be unlikely to affect European Protected Species within the scheme's zone of influence, nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence (or licences) will be required. Natural England is unable to comment on the need for a licence, this responsibility falls to the developer. For all licensing matters, applicants should consult		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Natural England's licensing guidance for the relevant species and decide whether a mitigation licence is required. Where any pre-consent surveys or assessment reveal the need for a licence from Natural England, we recommend using our Pre-Submission Screening Service, whereby we can assess a draft licence application and provide a LoNI (Letter of No Impediment), where we consider there to be no reason that a licence would not be granted post DCO consent.		
Natural England	Landscape and visual	Nationally Designated Landscapes Cotswolds National Landscape Natural England notes that the proposed development is located within the setting of the Cotswolds National Landscape (defined in legislation as an Area of Outstanding Natural Beauty). Please note that Natural England provides advice on the landscape impacts of NSIP proposals on designated	Yes	Comments noted. The Environmental Statement (ES) [EN010168/APP/6.1] includes an assessment of the landscape and visual impacts on the Cotswold National Landscape (CNL) in addition to its setting and specific assessment of the potential effects of the scheme on the special qualities of the CNL. Refer to ES Appendix 8.6: Landscape and Visual Impact

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		landscapes. On wider landscape issues applicants should obtain advice from local planning authorities and other local bodies. We welcome the work that has been undertaken to date to assess the potential landscape and visual impacts resulting from the proposed development. We note that a specific assessment of the potential effects on the Cotswolds National Landscape has not been included in the PEIR but consideration of these effects has informed the development and a full assessment will be provided in the Environmental Statement. The assessment must consider landscape and visual impacts on the National Landscape in addition to its setting and specific assessment of the potential effects of the scheme on the special qualities of the National Landscape. The assessment must consider the cumulative effects of all elements of the development and an assessment of the effects of the proposed development in combination with other relevant developments. This should		Assessment (LVIA) of the Special Qualities of the CNL [EN010168/APP/6.3]. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 LVIA of the Special Qualities of the CNL addresses construction traffic movements within the CNL and concludes there are no significant adverse impacts as a result of the development proposals. The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate in order to reduce development impacts and control any negative effects on the environment. Parcels within the setting of the CNL, on the boundary of the CNL have been removed from the scheme. Paragraph 189 of the NPPF is considered in the Environmental Statement (ES) [EN010168/APP/6.1] has directed the design with the removal of all fields on the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		include an assessment of the potential impact of construction activity on the tranquillity of the National Landscape which does not appear to be considered in the PEIR. These assessments are required before a conclusion can be reached on the significance of impacts on the Cotswolds National Landscape. Whilst noting that PEIR is based on summer photography, therefore representing a best-case scenario of visibility between the National Landscape and the proposed development, the work undertaken to date indicates that the topography of the land and existing vegetation limits the visual connection between the development site and the National Landscape. Based on the information presented in the PEIR, it is feasible that provided sufficient avoidance and mitigation measures are included in the design and layout of the proposed development, a significant adverse effect on the National Landscape can be avoided.		boundary of the CNL or within its immediate setting. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The CNL is fully assessed as its own standalone receptor in ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the CNL. It assesses the impacts of the proposal upon landscape character, visual amenity and the CNL's special qualities and addresses how the scheme seeks to further the purpose of the National Landscape's designation. Fields C2, C3 and C4 have been removed from the scheme entirely to avoid significant

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				adverse landscape and visual effects on the CNL and its setting. Panels within C1, C6, C8, the western section of C9, and the majority of C10 have been removed and the land used for ecological mitigation to protect the setting of the CNL. Panels within fields A11 and A12 have been removed and the land used for ecological mitigation to protect the setting of the CNL towards Sherston. All fields on the edge of the CNL provide habitat enhancement to further the purpose of the CNL designation and have been informed by the CNL Management Plan and the Cotswolds National Landscape (AONB) Landscape Strategy and Guidelines' The ES [EN010168/APP/6.1] includes an 'cumulative' assessment of all elements of the development including at all stages of the development (construction, operation and decommissioning) on the solar array, the cable route corridor and transport effects.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] is accompanied by Figure Series 8.14 Baseline Photography and Photomontage . The Assessment is based on summer and winter photography representing the worst case scenario.
Natural England	Landscape and visual	There are a number of areas in close proximity to the National Landscape where the current extent of proposed panels are likely to be visible and could negatively affect the special qualities of the National Landscape. The northern extent of Lime Down A is directly adjacent to the National Landscape. The indicative site layout shows panels will be located in fields directly adjacent to the National Landscape boundary. Viewpoint photography provided in the PEIR indicates that these areas will be visible from within the National Landscape, it is therefore recommended that panels are removed from the fields adjacent to the National	Yes	Infrastructure in A11 and 12 have been removed from the scheme and will be used for positive landscape and ecological enhancement within the setting of the CNL.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Landscape to reduce the effect. These fields should be used for landscape and ecological enhancements.		
Natural England	Landscape and visual	Further areas of Lime Down C are visible from the National Landscape and footpaths extending from the National Landscape to the wider countryside. The topography of Lime Down C makes it a more sensitive part of the site with panels in this area more likely to have adverse landscape and visual effects.	Yes	Parcels C2, C3 and C4 have been removed from the scheme in recognition that the topography makes this area of Lime Down C more sensitive. Parcel C1 and C6, on the edge of the Cotswold National Landscape (CNL) will remain within the scheme and will be used for positive enhancement within the setting of the CNL.
Natural England	Landscape and visual	Viewpoints 30 and 31 demonstrate that proposed panels in fields on the northern extent of Lime Down C are visible from a footpath within and within the setting of the National Landscape. It is therefore recommended that the extent of panels within Lime Down C is reviewed to avoid adverse landscape and visual effects on the National Landscape. Where panel areas are reduced, this should be used to provide landscape and ecological enhancements. Due to the importance of this area to lesser horseshoe bats as discussed above there will likely be opportunities to integrate	Yes	As noted above, Parcels C2, C3 and C4 have been removed from the scheme as they are these parcel are highly visible in VP 30 and 31 the footpath within and within the setting of the Cotswold National Landscape (CNL). Parcel C1 and C6, on the edge of the CNL will remain within the scheme and will be used for positive enhancement within the setting of the CNL including habitat enhancement for lesser horseshoe bats.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		landscape enhancements with habitat enhancements for lesser horseshoe bats.		
Natural England	Landscape and visual	We welcome that the PEIR recognises that Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but impacting on its natural beauty. We welcome that the applicant will consult with the Cotswolds National Landscape board on proposals which will be included in the DCO application to further the purposes of the National Landscape.	No	The Applicant makes note of this comment. Positive enhancements measures noted above will seek to further the statutory purposes of the area.
Natural England	Soils and agriculture	Soils and Best and Most Versatile Agricultural Land Natural England welcome the work that has been undertaken to date regarding soils	No	Natural England's response is noted and welcomed.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and Best and Most Versatile (BMV) agricultural land. Natural England provides the following advice on the submitted information: Preliminary Environmental Information Report Volume 1, Chapter 17: Soils and Agriculture 17.3.8 - Natural England advise the applicant check the accuracy of this policy. In December 2024 The National Planning Policy Framework was revised in response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation. 17.4.1/5.1 - Natural England support the effort to carry out surveys so far and recognise the commitment to further surveys including the cable route corridor. To clarify Natural England would advise that for all areas of agricultural land subject to temporary and permanent loss, in which		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Post-1988 ALC survey information is not available, an ALC survey should be undertaken. The ALC surveys will identify the ALC grade, which can then be used to contribute to the master planning, so as to demonstrate the potential impacts on BMV agricultural land were minimised as far as practicable, as per the NPS EN-1, and NPPF. 17.6.1 – Natural England confirm that we have agreed the survey methodology detailed in this paragraph. 17.9.1 - Natural England support the commitment to provide a Soil Management Plan (SMP) as a requirement of the DCO. A SMP may be expected to be prepared in line with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The SMP should include the following: i. An assessment of agricultural land and soil resource of the site will be undertaken		

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		before work commences (as per Natural England's Guide to assessing development proposals on agricultural land) which is considered to represent UK good practice. ii. Mitigation should include reference to the Defra Construction Code iii. The methods by which the applicant intends to restore appropriate affected areas to agricultural use after works including excavations and restoration has finished. iv. An aftercare programme which would enable a satisfactory standard of agricultural after-use to be reached, with regards to cultivating, reseeding, draining or irrigating, applying fertiliser, or cutting and grazing the site. Where topsoil is proposed to be stripped, typically for construction compounds; access tracks and laying cabling, the soil handling methodology (movement, storage & replacement) and soil protection proposals are reviewed to ensure that appropriate mitigation is in place to allow for		

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		the restoration of the land to the baseline ALC Grade. 17.10.6 - There should also be a commitment for 'best and most versatile' (BMV) agricultural temporality required for the development to be returned back to its original ALC grade. This includes areas such as field scale ecological mitigation areas and borrow pits where reinstatement to the physical characteristics of 'best and most versatile' quality may also be required. Table 17.5 - Include SMP as a mitigation measure to ensure moderate beneficial of temporary benefits to soil health as indicated in paragraph 17.9.5. 17.12 - Natural England broadly supports the approach to cumulative assessment. Agricultural Land Classification is a national dataset therefore we advise the cumulative assessment should also include the proposals impact against the national BMV figure.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Natural England	Soils and agriculture	Preliminary Environmental Information Report Volume 3, Appendix 17-1: Soils and Agriculture 1.1.1.1 - Standards in reports writing for ALC require that all soil surveyors are named, and relevant qualifications and experience is provided. WE advise this detail is absent and should either be written into the main report or appended. Laboratory Data - Please append all certificates received from the laboratory At this stage a detailed review of the data has not been undertaken, however the presented data methodology appears reasonably robust, following the MAFF (1988) Agricultural Land Classification for England and Wales: Guidelines and Criteria for Grading the Quality of Agricultural Land. Initial comments on the Agricultural Quality Report (2023) include: • The name, qualification and experience of	No	Surveyors names, qualifications and experience have been added, as have the lab certificates. These can be found in Environmental Statement (ES) Volume 3 Appendix 17-1: Agricultural Land Classification and Soil Survey Report [EN010168/APP/6.3]. The remainder of the solar PV area has been surveyed and is assessed within ES Volume 1 Chapter 17: Soils and Agriculture [EN010168/APP/6.1], as has representative sampling of the cable corridor, as agreed with Natural England.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the lead surveyor undertaking the ALC survey work is not given. This is important to demonstrate the likely competence of the lead surveyor. • The survey has not graded parts of the Solar PV Site area, nor the potential cable route corridors (figure 17.2); an ALC survey should be undertaken for these areas as part of the baseline soil and ALC information given that soil disturbance will take place in these areas.		
Natural England	Ecology and biodiversity / Landscape and visual	Habitat Enhancements We welcome that the environmental constraints within this area have informed the design and layout of the proposed development and areas have been included within the development boundary but retained free of panels or associated development to provide opportunity for ecological enhancements. We support opportunities for ecological enhancements identified in the PEIR, we provide the following advice on additional opportunities for enhancements across the site:	No	Recommendations for habitat enhancements are noted. Proposed habitat enhancement measures are described in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], and are shown in ES Volume 2, Figure 3.4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. The Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] sets out how the habitats will be secured and maintained/managed for the lifespan of the Scheme along with a comprehensive

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		• The development site is adjacent to Harries Ground, Rodbourne SSSI which is designated in part due to the species rich neutral grassland community the site supports. To expand the cover of this distinct grassland community with the landscape, the applicant should explore using the hay cut from the SSSI to seed the grassland in adjacent or surrounding fields within the development site. This will aid in expanding this community and reduce the chance other species being introduced to the SSSI from seeding the adjacent field with a standard meadow seed mix. • Further, the SSSI is designated due to the population of marsh fritillary the site supports. As discussed above, historical records of the butterfly and its food source (devils' bit scabious) should be used to inform an understanding the location and size of the butterfly population in the landscape and used to direct locations for habitat enhancement for the butterfly within the development site. Habitat		ecological monitoring schedule. All of the recommendations provided by Natural England have been incorporated within the package of proposed habitat enhancement measures, including the following: Use of hay cut from Harries Ground, Rodbourne SSSI to seed proposed grassland in Lime Down E where feasible; Inclusion of devil's bit scabious in proposed seed mixtures; Woodland planting and pond creation in Lime Down C, likely of benefit to lesser horseshoe bats and great crested newts; Retention of large areas (including whole fields) given to set-aside, providing excellent habitat for breeding skylarks and suitable conditions for arable weeds to thrive; Scrubby woodland edge habitat provide along the southern margin of Bradfield

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		enhancements would include planting devils' bit scabious within the enhancement areas or margins/buffers of the development site. Areas where devils bit scabious is being established should not be grazed by sheep. • As discussed above, Lime Down C is well used by lesser horseshoe bats, a feature of the Bath and Bradford on Avon Bats SAC. Habitat enhancements within Lime Down C should be focused on enhancing the habitat suitability in this area for lesser horseshoe bats. Lesser horseshoe bat's preferred foraging habitat is broadleaf woodland, particularly woodland with water. Wetter areas of habitats such as ponds or scrapes will also likely provide a source of inspect prey species. Creation of woodland and ponds in this area will increase the foraging value of Lime Down C for lesser horseshoe bats. Presence of great crested newt has also been recorded within the development site, including at Lime Down C. Creation of ponds would increase habitat suitability		Wood and riparian planting along Gauze Brook in Lime Down D; and Woodland creation, grassland enhancement and riparian planting in Lime Down E.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		within this area for GCN. • It is understood that mitigation will be required for the displacement of skylark from areas of the proposed development. In areas which will be used to provide mitigation for skylarks, opportunities should be explored for the establishment of arable weeds. These are native plant communities which are increasingly rare in the landscape and provide a good habitat for pollinators and other farmland birds. Arable weeds will provide suitable habitat for skylarks, will likely to be easier to establish than diverse grassland communities where soil nutrient levels are high, and will be lower maintenance than meadow grassland, for example. We would welcome if opportunities to create this habitat on the development site could be explored, either in skylark plots as discussed above, or in buffer zones between the panel and retained important ecological features. • Lime Down D – Woodland should be		

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		expanded, and a woodland edge created. Habitat enhancements along the north eastern extent of Lime Down D should focus on improving connectivity between Bradfield Wood and West Park Wood. The river in this area likely forms an ecological corridor through the landscape, enhancements should expand riparian habitats and where possible establish a wider range of wet or wetland habitats. • Lime Down E - There are a number of areas of isolated woodland and lowland meadow adjacent to and within Lime Down E. The river in this area also likely forms an ecological corridor. Woodland in this area should be expanded through woodland planting and establishing a woodland edge. Opportunities should be sought to better connect the woodland areas, for example through woodland, tree planting, and scrub in addition to grassland enhancements to create a mixed habitat with a range of habitat structure and types improving both grassland and woodland connectivity in this		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		area. Where the development site is directly adjacent or in close proximity to the river, opportunities should be taken to expand riparian habitats. • Species choice for ecological enhancements should reflect locally native and prominent species to contribute to the specific landscape character of the area.		
Royal Mail	Scheme description and DCO process / IGP / Traffic and transport	Proposed DCO Application by Lime Down Solar Park Limited for Lime Down Solar Park Royal Mail Group Limited's response to Stage 2 (s42) consultation ending 19 March 2025 Introduction Royal Mail and its consultants BNP Paribas Real Estate have reviewed the consultation material for the above project and wish to submit this response as part of the Stage 2 consultation.	No	Details of construction traffic are secured through the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22]. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised and will include measures to restrict HGV arrival and departure times so that they do not conflict with peak commuter times and school drop-off/pick-up times. Outside of the identified construction vehicle routes, there will not be transport and access effects.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Royal Mail – relevant information Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom’s primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service. Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project. Royal Mail’s postal sorting and delivery operations rely heavily on road		

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		communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business. Royal Mail position on Lime Down Solar Park as at March 2025 Royal Mail and its advisor BNP Paribas Real Estate have reviewed the Preliminary Environmental Information Report ('PEIR') document dated January 2025. Royal Mail has 7 operational properties within 10 miles of the proposed scheme boundary (including the export cable corridor area of search).		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		1. Chippenham DO c. 200 metres 2. Melksham DO/FPO/LAN – c. 2km 3. Tetbury DO – c.7.5km 4. Calne DO – c.8.5km 5. Calne PAR – c.8.5km 6. Trowbridge DO/RTW – c. 8.3km 7. Bradford on Avon DO – c.9km Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the construction and operation of the proposed Lime Down Solar Park. Whilst the operation of the proposed Solar Park it will not impact in any way upon Royal Mail's operational interests, the highways impact of the construction of the Solar Park, its cable route and associated infrastructure together with other major developments in the vicinity that are of potential concern to Royal Mail's road based operations. Any periods of road disruption / closure,		

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		night or day, on or to the roads immediately connected to the proposed development or to the surrounding highway network will have the potential to impact Royal Mail operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets. Based on the PEIR and without seeing a draft Construction Traffic Management, Plan Royal Mail is presently unable to accurately assess the level of potential risk to its operations. Royal Mail therefore wishes to reserve its position at this stage to submit a consultation response/s later in the DCO consenting process when sufficient information is available. In the meantime, any further consultation information on this infrastructure project and any questions of Royal Mail should be sent to: [REDACTED]		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		██████████@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited ██████████ ██████████ ██████████@realestate.bnpparibas), Director, BNP Paribas Real Estat		
Sherston Parish Council	Transport and access	Transport and access (e.g. the impact on the local road network) The sheer volume of additional traffic over at least a 2 year construction period, will create unacceptable noise and pollution, as well as endangering pedestrians, cyclists and horse riders – it should be noted that area is a haven for cyclists. The proposed road network is currently not able to accommodate the level of traffic indicated, widening the roads will only serve to remove the remoteness, village/countryside feel of the area and open it up to further potential development. We have concerns about the impact this intensive period of activity will have on residents' ability to move freely in the local area i.e. impact on travel times to work,	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. Construction vehicle routes selected are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO) The aim of the CTMP is to ensure that the effect of the construction phase on the local highway

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		transporting children to school etc. We are concerned that the impact of glint and glare from the panels as seen from all but two roads have not been assessed at all.		network is minimised and will include measures to restrict HGV arrival and departure times so that they do not conflict with peak commuter times and school drop-off/pick-up times. Outside of the identified construction vehicle routes, there will not be transport and access effects. In regard to pedestrians and other non-motorised users, an assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area. The capacity of local roads/infrastructure to accommodate construction vehicles is assessed in ES Volume 1, Chapter 13: Transport and Access

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				[EN010168/APP/6.1], which concludes there are no significant adverse impacts. ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] also identifies specific highway improvement areas where traffic management or passing bays may be required on narrower sections of the construction routes. Traffic noise during both construction and operation is assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and no significant effects are predicted, with impacts expected to be negligible or low. Controls on construction traffic are secured through the Outline CTMP [EN010168/APP/7.22]. ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] presents an assessment of Glint and Glare from the Scheme on surrounding receptors (including rail, roads, residential properties,

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				aerodromes, PRoWs and the Cotswold National Landscape (CNL)). The assessment concludes that with the implementation of mitigation measures such as use of 2.5m fixed panels where required no significant effects are predicted as a result of the Scheme.
Sherston Parish Council	Socioeconomic, tourism, recreation and health / Landscape and Visual	Socio-economic, tourism and recreation (e.g. wider benefits of the Project, including job creation, and impacts on public rights of way and access) Tourism is a vital part of the local economy, supporting countless businesses, jobs, and livelihoods. The first sight many visitors will encounter when entering the area from the south will be an ocean of solar panels, stretching across miles of countryside visible from the Cotswold AONB. This industrialisation threatens to undermine the region's reputation as a place of natural beauty, harming local businesses and the wider economy.	No	A detailed assessment of the likely significance of effects from the Scheme on individual PRoW, tourism destinations, recreational features, and the economic impact to the tourism economy has been included in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations, and the potential impact on tourism-dependent businesses in the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				areas immediately impacted by the Scheme. The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate in order to reduce development impacts and control any negative effects on the environment. Parcels within the setting of the Cotswold National Landscape (CNL), on the boundary of the CNL have been removed from the scheme. Paragraph 189 of the NPPF is considered in the ES [EN010168/APP/6.1] has directed the design with the removal of all fields on the boundary of the CNL or within its immediate setting. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The CNL is fully assessed as its own standalone receptor in ES Volume 3, Appendix 8.6: Landscape and Visual Impact Assessment (LVIA) of Effects on the Special Qualities of the Cotswold National Landscape. It assesses the impacts of the proposal upon landscape character, visual amenity and the CNL's special qualities and addresses how the scheme seeks to further the purpose of the National Landscape's designation. Fields C2, C3 and C4 have been removed from the scheme entirely to avoid significant adverse landscape and visual effects on the CNL and its setting. Panels within C1, C6, C8, the western section of C9, and the majority of C10 have been removed and the land used for

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				ecological mitigation to protect the setting of the CNL. Panels within fields A11 and A12 have been removed and the land used for ecological mitigation to protect the setting of the CNL towards Sherston. All fields on the edge of the CNL provide habitat enhancement to further the purpose of the CNL designation and have been informed by the CNL Management Plan and the CNL (AONB) Landscape Strategy and Guidelines'
Sherston Parish Council	Socioeconomics, tourism, recreation and health / Landscape and Visual	Human health (e.g. the impact on physical and mental health) The Cotswolds is one of the UK's most treasured landscapes, drawing visitors from around the world. Towering panels, industrial structures, and fencing will destroy unspoiled countryside views, replacing them with an industrial wasteland. During the Covid period, many people travelled from the likes of Bath and Bristol to enjoy the landscape	No	The Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 LVIA of the Special Qualities of the Cotswold National Landscape (CNL) includes an assessment of the impact of the Scheme on the CNL and the Special Qualities.

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		If this type of facility was not available, or restricted in terms of walkers feeling herded through local fields with 4.5m solar panels either side, surely it would impact their mental health, presumably one of the reasons they walk. There is a daily influx of walkers/ramblers visiting the village to enjoy the local walks, these visitors also contribute to the local economy spending money in cafes, pubs and local shops. The loss of the countryside amenity we believe will result in an overall loss to the community in general		The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate in order to reduce development impacts and control any negative effects on the environment. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability individual PRoW, tourism destinations, such as the Cotswold National Landscape, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations, and the potential impact on tourism-dependent businesses in the areas

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				immediately impacted by the Scheme. The Applicant acknowledges that the Scheme is likely to change how some communities view and appreciate their surroundings, how they identify with them, and the potential this has for mental health impacts. For the purpose of assessment, this is considered part of a community's 'culture and identity'. Access to and enjoyment of the countryside is also considered part of the consideration of access to 'open space, leisure and play'. The communities most immediately affected are assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1], which concludes that concludes no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation.

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South Oxfordshire and Vale of White Horse District Councils	Scheme description and DCO process	Thank you for your statutory consultation and notification dated 22 January 2025 pursuant to Sections 42 and 48 of the Planning Act 2008 for the Lime Down Solar Park NSIP. The Vale of White Horse District Council has no comment to make on this project.	No	The Applicant makes note of this comment.
South Oxfordshire and Vale of White Horse District Councils	Scheme description and DCO process	The Vale of White Horse District Council has no comment to make on this project.	No	The Applicant makes note of this comment.
St Paul Malmesbury Without Parish Council	Transport and access	Highway Issues The 20,000+ HGV movements required in the construction phase are likely to result in damage to local narrow roads and verges with a significant increase in the dangers to pedestrians, cyclists and horse riders. This is particularly relevant to the hamlet of Rodbourne, which has been designated as a conservation area, and as such must be maintained and preserved, where possible, for future generations. The presence of the planned significant numbers of these vehicles transiting the centre of the	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2] . Rodbourne does not form part of the construction vehicle routes with Access to Lime Down E being taken directly from the A429. The construction vehicle routes are considered to be the most appropriate to access the

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		settlement will undoubtedly cause unacceptable levels of damage and hazard. Add to this the daily volumes of workers' vehicles using these roads and lanes and the situation becomes even more critical. In the council's opinion the proposed highway routes are unenforceable and will quickly be bypassed		Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised and will include measures such as the requirement for road condition/dilapidation surveys. Outside of the identified construction vehicle routes, there will not be transport and access effects. In regard to pedestrians and other non-motorised users, an assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially

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				affect road safety on the links in the Study Area.
St Paul Malmesbury Without Parish Council	Soils and agriculture	Food Security The aim to improve the food security situation in the UK should not be compromised by large scale proposals such as this which will destroy approximately 30% of good quality agricultural land	No	Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap (2024)</i> states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term

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				risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.
St Paul Malmesbury Without Parish Council	Scheme description and DCO process	The St Paul Malmesbury Without Parish Council strongly opposes the Lime Down Solar Park proposal. Whilst supporting appropriate means of delivering sustainable energy for the United Kingdom, the use of gigantic solar panel farms such as proposed will deliver numerous extremely harmful impacts to the local community and environment. The council's opinion is that solar energy is best delivered closer to the end user by solar roof tiles/panels being made mandatory for all new residential and industrial developments. The council's opposition primarily focusses on the impact on the areas around Corston and Rodbourne:-	No	Noted. Opportunities to locate Solar PV Panels on previously developed land (PDL)/brownfield land, contaminated land, industrial land and commercial rooftops were explored in the counties of Wiltshire, South Gloucestershire, Bath and North East Somerset and Somerset. However, none of the sites were large enough to provide a viable land parcel of at least 40 ha to facilitate a large scale NSIP project over 50 MW. More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Report [EN010168/APP/6.3].

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				Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes, and may also include other small scale solar such as walls or fences, will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that “Solar energy is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy” (p15). The Roadmap talks to

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				the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because “Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale” and “Speed of deployment is also a huge benefit of solar” for both ground mounted and rooftop schemes (p15). This “makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets.” The Roadmap includes illustrative deployment scenarios which “show that reaching the Clean Power 2030 range is achievable, but will require significant action” (p16). Large-scale solar represents 60-65% of the UK’s installed solar capacity by 2030 in the Roadmap’s illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range through the

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				illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in deployment of these schemes must be made up for by other technologies, including from large scale schemes. These publications make it clear, and the Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme.
St Paul Malmesbury Without Parish Council	Noise and vibration	Noise The noise and the light reflection from the solar panels as they track the sun will	No	Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] only applies to human receptors. Nevertheless, horses and

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		adversely affect a number of 'high end' equine businesses in Corston and Rodbourne because of the highly strung characteristics of the animals under training.		humans share a closely related hearing range. The British Horse Society state that <i>"A horse's range of hearing is greater than a human to higher frequencies (over 33 kHz in the horse compared with under 20 kHz in humans) although a horse may not be able to hear the lowest frequencies audible to humans"</i>. High levels of noise are acknowledged as having the potential to disturb horses, however, as can be deduced from ES Volume 2, Figure 14-2: Daytime Operational Noise Contours [EN010168/APP/6.2] and ES Volume 2, Figure 2-4: PRow and Highways [EN010168/APP/6.2], expected levels from the Scheme in the vicinity of bridleways, Corston and Rodbourne are around or below 30 dB. This is in line with the existing quiet background sound environment, and therefore unlikely to cause disturbance to horses or equestrian bridleway users. Horses may be startled by sudden high levels of construction noise. Consequently, engagement will be undertaken with

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				equestrian groups on the scheduling of construction activities with the potential for generating high levels of noise in the vicinity of PRow or other highways frequently used by horse riders. This commitment to engagement is secured in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].
St Paul Malmesbury Without Parish Council	Landscape and visual	Visual Impact By virtue of the size of the panels being proposed, effective levels of screening are unlikely to be achieved in a reasonable timescale, if ever. The impact upon the landscape of this area will be adversely affected with the number visitors likely to fall which will impact the many small businesses that offer accommodation in Corston and Rodbourne. The landscape around the villages of Corston and Rodbourne will become a sea of panels.	No	The Applicant makes note of this comment. The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] has assessed the effects of the development on all private residential receptors including individual properties, groups of properties and nearby

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				settlements within the 1km Study Area of the scheme. The scheme has been prepared to avoid significant adverse effects and/or to provide landscape mitigation measures. Refer to ES Volume 3: Appendix 8.3 ES LVIA Assessment Sheets [EN010168/APP/6.3] The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19].
St Paul Malmesbury Without Parish Council	Hydrology, flood risk and drainage / Soils and Agriculture	Contamination Any harmful chemical leaks from from the infrastructure supporting solar farms of this size are likely to contaminate the aquifers	No	The Scheme has been designed with a focus on minimising the risk of contamination to the environment, particularly with respect to groundwater and aquifers. We understand the concern

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		that provide water to residents throughout a large area of north Wiltshire. This contamination will be increased by firefighting water if there should be a fire in any of the numerous battery storage systems [BESS] as well as the use of herbicide to the substations. Once contamination has occurred the process cannot easily, if ever, be reversed.		regarding the potential for contamination from both the solar infrastructure and associated components such as Battery Energy Storage Systems (BESS) and substations. However, we would like to clarify key aspects of the scheme that address these concerns. Firstly, the solar panels themselves do not present a significant source of potential contamination. The majority of the site will consist of solar panel arrays, with the panels positioned over semi-improved grassland or meadow planting. This shift from agricultural land to solar arrays will result in a substantial reduction in agrichemical inputs, such as pesticides and fertilisers, which are commonly used in farming. This change will significantly reduce the potential for contamination that is typically associated with conventional agricultural practices. The potential impact of contaminated fire water runoff is assessed within

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				Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. No likely significant effects on water quality are anticipated. In addition, the BESS and substations have been designed with site-specific drainage strategies to ensure that any potential contamination risks are carefully managed. The drainage systems for these components will include lined and sealed drainage systems to prevent any harmful substances from entering the surrounding environment. In the unlikely event of a fire or spill, the outfalls from these systems will be controlled by self-actuating valves, which will automatically close and isolate the drainage system to prevent the spread of contaminants, including firefighting water. Further information on this is provided in the Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21]. The scheme has been developed in line

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				with best practices for pollution prevention and will be subject to ongoing monitoring and regulation to ensure the protection of both surface and groundwater. We are committed to working with the relevant regulatory bodies, such as the Environment Agency (EA), to ensure compliance with all necessary standards and to minimise any potential contamination risks.
St Paul Malmesbury Without Parish Council	Hydrology, flood risk and drainage	Flooding Many properties in Corston presently experience flooding from the Gauzebrook, on its existing re-engineered course, during periods of prolonged rainfall because it is unable to handle the volumes of water delivered during these events. Plans are in their infancy to return the Gauzebrook to its original course thereby allowing higher volumes of water to be managed. The installation of large numbers of solar panels on this floodplain would not only prevent this plan being delivered but, by the increased runoff from the solar panels,	No	The potential for flooding in Corston and the ongoing discussion around future improvements to the Gauzebrook have been considered within the submitted Environmental Statement (ES) Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], and the supporting Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. The Scheme does not obstruct or occupy the Gauzebrook floodplain. It borders only a limited stretch of the watercourse and includes embedded mitigation in the form of undeveloped eight-metre buffers along all main rivers and ordinary watercourses.

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		would significantly increase the flooding frequency and impact in Corston.		These buffers preserve existing flow routes, support ecological function, and ensure that floodplain connectivity is retained. Should proposals for the restoration or re-routing of the Gauzebrook be brought forward in future, the Scheme would not preclude them and the Applicant remains open to further engagement with relevant authorities on this matter. The claim that solar panels increase runoff is not supported by evidence. The Scheme replaces arable farmland with grassland beneath and between the panels, which improves infiltration and reduces surface water runoff. This is supported by research such as Cook and McCuen (2013), which demonstrates that solar developments with vegetated ground cover do not significantly increase runoff compared to baseline agricultural land. Surface water runoff from all developed areas will be attenuated to greenfield rates, and no increase in flood risk is predicted

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				either on-site or downstream. These conclusions have been reviewed with the Environment Agency and Lead Local Flood Authority as part of the application process. In addition, the Applicant is willing to explore opportunities for Natural Flood Management (NFM) measures, either as embedded enhancement or as part of the community benefit offering, to further support local flood resilience in the Corston area.
Tormarton Parish Council	Consultation and engagement / Transport and access	Dear Consultation Team Please see below the agreed response from Tormarton Parish Councillors: Tormarton Parish Council has not been approached or included in consultations. However, being so close to the Lime Down site and sited next to the M4 at Junction 18 and the A46, we are very concerned regarding the increased levels of traffic during the 2-year construction phase. It is reasonable to suggest that a large	Yes	The Applicant did not consult Tormarton Parish Council directly as it was not identified as a section 43 interest (host or neighbouring) and sits outside of the core consultation zone established for statutory consultation. In response to this feedback, the Applicant has added Tormarton Parish Council to its database moving forward, meaning the Clerk will be issued digital and postal communications when the Applicant distributes these to local parishes. Construction vehicles accessing Lime

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		percentage of traffic will route from Junction 18 of the M4 – HGVs, buses (for staff) and private vehicles. We note that it is proposed that traffic to the site is routed from Junction 18 to the Old Sodbury crossroad and onto Acton Turville, Burton, Littleton Drew, etc. Tormarton is a small village and is already used by large numbers of commuters to ‘park & share’ on our narrow road verges, passing places and anywhere there is space! Cars are often parked dangerously. As well as verges, cars are parked in the village as well, causing parking and speeding issues to residents. The Tormarton to Acton Turville road (Acton Turville Road) is a long straight rural road and is used as a shortcut to Acton Turville, rather than the Old Sodbury route. VAR speed signs show the large majority of road users exceed the speed limit of 40mph. It is totally unsuitable for large		Down A, B and C will route to the Site via Junction 18 of the M4 and the A46. No vehicles will be routed through Tormarton. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The Tormarton to Acton Turville Road is not included in the construction traffic routes for the Scheme. The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic

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		vehicles, buses, etc. and particularly unsuitable for HGVs. Already, multiple accidents have taken place on this road within the village area and a new Casualty Reduction Scheme is about to be implemented at the Tormarton crossroads in a bid to make the road safer. The Cotswold Way crosses the Acton Turville road and a large increase in traffic will increase the risk to pedestrians. In addition, Norley Lane is used as a cut-through from the A420 to the A46. It is a single lane road and completely unsuitable for a large volume of vehicles. We note that one of your priorities is 'to avoid disruption to roads during construction' and we would be interested to know how you intend to police this. It's obvious to us that many construction staff would choose the route through Tormarton rather than the route you are proposing they use. Should the solar farm development go ahead, we would request		grid planning. High voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests.

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		signs at both ends of the Acton Turville Road to prohibit construction traffic using this route. We believe the Lime Down site is in a totally inappropriate location for such a large solar site, with the additional cable route corridor to Melksham.		
Vodafone	Scheme description and DCO process	New Roads and Street Works Act 1991 Stopping Up Order / Footpath Diversion / Extinguishment / Gating Order No Objection We refer to the below or attached order and confirm that we have no objections Please email Stopping Ups to osm.enquiries@atkinsglobal.com To enable us to process your application as quickly as possible, please ensure you include Grid References.	No	The Applicant makes note of this comment.

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		A copy of the Cable and Wireless process 4461 'Special Requirements relating to the external plant network of Cable and Wireless UK Services Ltd' is available on request. The process provides guidance on working in the vicinity of Cable and Wireless's apparatus. IMPORTANT - PLEASE READ = Your Next Step?:- Where apparatus is affected and requires diversion, please send all the scheme related proposals that affects the Vodafone Network to c3requests@vodafone.com with a request for a 'C3 Budget Estimate'. Please ensure you include a plan showing proposed works. (A location plan is insufficient for Vodafone to provide a costing). These estimates will be provided by Vodafone directly, normally within 20 working days from receipt of your request. Please include proof of this C2 response when requesting a C3 (using the 'forward' option). Diversionary works may be		

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		necessary if the existing line of the highway/railway or its levels are altered.		
West Berkshire District Council	Scheme description and DCO process	West Berkshire District Council has no comment on this matter.	No	The Applicant makes note of this comment.
Wiltshire Council	Transport and access	11. As it stands, the proposals contain little or no reference to the communities likely to be affected by traffic, as well as damage to the roads and verges etc. Little is known as to the exact routes for construction traffic, which will clearly have implications to the local communities.	No	Impacts to transport and access within and surrounding the Order Limits is set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] . Proposed construction vehicle routes are set out in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2] .
Wiltshire Council	Transport and access	13. Highways and Transport Considerations 13.1. In preparing these comments, the council has considered Chapter 13	No	The Applicant makes note of this comment.

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		(Transport and Access) of the PEIR and its associated figures. Regard has also been had to EIA Scoping Opinion issued on 2 August 2024. Whilst it is acknowledged that the design of the scheme continues to evolve, the council considers that the EIA scoping advice has been included within the developing proposals. 13.2. The council is supportive of the approach for the work undertaken to date by the applicant, in terms of presenting the scheme proposals and the impacts that would arise in terms of direct highways impact. Whilst it is acknowledged that further work is required, the council is content that these have been identified and does not consider that further input is required by the council at this time in terms of the approach and background data. It is considered that the highways and transport section is clearly presented and can be understood by statutory consultees and any other person who may wish to comment on these matters during the statutory public		

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		consultation. 13.3. However, the council wishes to raise the following matters for the applicant to take forward in the further assessment and design development to ensure that any further works respond appropriately.		
Wiltshire Council	Transport and access	13.4. The 'Highway Improvement Areas' should be considered in the context of the need to carry out such improvements solely to support this proposal and the expectation that these improvements are no longer necessary. There should be a clear distinction for any 'Highway Improvement Area's' which are intended to remain in place even after the commissioning works are completed.	No	Where the construction routes pass through sections of road that are considered narrow and require widening, these have been adopted into the design as 'Highway Improvement Areas' where minor works will be undertaken to ensure there is sufficient space. The Highway Improvement Areas will be left in situ for the lifetime of the Scheme.
Wiltshire Council	Transport and access	13.5. The council notes that applicant's position that some increases in traffic are larger in percentage terms due to existing low levels of movement. However, in terms of movement, the council's expectation will be for route widths and passing to be acceptable, to which the number and frequency of occurrences is less of an issue	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route

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		than ensuring that even if it only occurs once, that it does so safely and suitably.		Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). Where the construction routes pass through sections of road that are considered narrow and require widening, these have been adopted into the design as 'Highway Improvement Areas' where minor works will be undertaken to ensure there is sufficient space.
Wiltshire Council	Transport and access	13.6. In some cases, the council considers that management of traffic may be a more reasonable or suitable approach than improvement, but this would come forward as matters progress.	No	The Applicant has considered and proposed traffic management measures along construction vehicle routes, where practicable, for the Scheme in the first instance. However, where the construction routes pass through sections of road that are considered narrow and require widening, these have been adopted into the design as 'Highway Improvement Areas'

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				where minor works will be undertaken to ensure there is sufficient space. The Applicant has engaged with the Local Highway Authority regarding this throughout the pre-submission stage and will continue to engage through the post-submission stages. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). All deliveries will be scheduled in advance using a booking system. Drivers will be instructed to stop in an appropriate layby or service station and make contact if they are likely to miss their allotted slot to allow the schedule to be adapted in as much as possible. The intention of this procedure is to avoid instances of HGVs passing each other in opposite directions on the local roads

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				surrounding the Site. In addition, the CTMP commits to banksmen which will also reduce the need for physical widening works. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.
Wiltshire Council	Transport and access	13.7. The council considers that if the applicant's goals for staff numbers and arrivals by shuttle bus or travel planned solutions are to be meaningful, there needs to be clear monitoring and performance measures to ensure that the stated approach is adopted during delivery. Furthermore, the assumptions in terms of staff numbers and arrivals by mode must move towards practical and managed outcomes with realistic strategies. Other site assumptions would need to be presented as having been achieved and met in implementation to satisfy the reliance on them any further.	No	A Construction Workforce Management Plan (CWMP) is appended to the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] which will be developed into a detailed CTMP post-consent as secured by the Development Consent Order (DCO). As part of the CWMP and CTMP [EN010168/APP/7.22], the developer will monitor the uptake of shuttle bus services and car sharing.
Wiltshire Council	Transport and access	13.8. As indicated by the applicant, it is the council's expectation that the construction management plan and abnormal loads elements form part of any DCO. The	No	The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		council wish to retain final positions on these and authority. The council would seek to ensure that the impact on local people and villages is minimised through measures agreed under the construction traffic management plan. This would include paying careful attention to the routes that would need to be agreed for construction traffic and seeking to ensure that temporary traffic management provisions are implemented in a manner that minimises potential disruption on the local area. The council will aim to ensure that temporary traffic management measures, for example the use of traffic marshals and controlling the times for deliveries, are secured and adapted as appropriate to respond to the local context. The council also considers it necessary to ensure that provision is in place to recover the cost of additional maintenance and repairs that may be required to the highway as a result of extraordinary traffic, under Section 59 of the Highways Act.		Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised and will include measures such as: -Temporary traffic management; -The control of delivery timings; and -Road condition survey. The Applicant does not consider that the proposals for the Scheme include any extraordinary traffic.

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Wiltshire Council	Transport and access	13.9. Whilst it is acknowledged that the exact proposals in terms of roads, accesses, and highway impacts are still developing (and survey work is still in the process of being completed), for any works within or affecting the local highway network, the council will need to consider the verge, footways and pathways and the carriageway. It is noted that open cutting of the highway will require a greater reinstatement when compared to directional drilling. The council, therefore, reserves the right to comment further on this matter once the scheme designs are more advanced. Any new apparatus within the highway will need to be licenced under Section 50 of the New Roads and Streetworks Act (NRSWA).	No	The Applicant provides provisions within the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] for Wiltshire Council to retain technical approval rights for works in the highway, including consideration of verge, footways, pathways and the carriageway. The draft Development Consent Order (DCO) [EN010168/APP/3.1] provides the Applicant with a statutory right or licence to place and maintain apparatus and carry out street works for the purposes of sections 48 and 51 of the New Roads and Street Works Act 1991.
Wiltshire Council	Transport and access	13.10. The council will also need to consider any vehicle access onto private land which requires changes to the highway fabric, and these works will need to be licenced in some way. Depending on whether the access is temporary or permanent, the construction detail will vary and will require approval at the licencing	No	The draft Development Consent Order (DCO) [EN010168/APP/3.1] provides the Applicant with the powers required to implement the Scheme. The DCO includes a number of powers relating to works on highway land, including in respect of the making of new accesses and improvement of existing accesses as set out in the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		stage. A dilapidation survey of the highway condition may be required on high traffic count areas so that the highway can be returned to its original state at the end of construction. The council awaits further details from the applicant to assess whether this will be applicable.		schedules to the DCO and shown on the Access Plan [EN010168/APP/2.6] . The Applicant provides provisions within the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] for road condition/dilapidation surveys to be undertaken so that any damage highways can be identified and rectified following the construction phase of the Scheme.
Wiltshire Council	Transport and access	13.11. Furthermore, a permit will be required for any works on the highway and depending on the traffic management method proposed, a Portable Traffic Signals licence or Traffic Regulation Order (TRO) may be required. Approval from the council's Streetworks team will be required in either instance. The council considers it prudent to remind the applicant that for large scale works, a 12 week notice period is required and the same notice period also applies if a Temporary Traffic Regulation Order (TTRO) is necessary. The council cannot guarantee that the network will be	No	The draft Development Consent Order (DCO) [EN010168/APP/3.1] provides the Applicant with the powers required to implement the Scheme. The DCO includes a number of powers relating to works on highway land, including in respect of traffic management and the making of directions that apply as though they were Temporary Traffic Regulation Orders. Notice must be given to the local highway authority and the police in advance of the making of such a direction, ensuring the local highway authority is fully aware of traffic management on their network.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		available for the dates and duration required by the applicant and encourages the applicant to provide as much information as possible in advance to aid efficient working practices.		The Applicant provides provisions within the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] for Wiltshire Council to retain technical approval rights for works in the highway, including consideration of verge, footways, pathways and the carriageway. Road booking space will be requested through Wiltshire's Street Works Permit scheme for any works on the highway.
Wiltshire Council	Transport and access	13.12. Whilst access and approvals may be a matter that can sit wholly within the DCO, subject to demonstration of the work and being satisfied that they can be carried out without the need for provision of powers and approvals under the Highways Act. At present, the council will reserve the right to retain final positions and authority on these matters also.	No	The draft Development Consent Order [EN010168/APP/3.1] provides the Applicant with the powers required to implement the Scheme. The DCO includes a number of powers relating to works on highway land, providing for laying and maintaining apparatus in the street (street works), the creation and improvement of accesses, alteration to highway layout (e.g. for the Highway Improvement Areas), and the traffic management measures required to carry out all such works.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Applicant also provides provisions within the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] for Wiltshire Council to retain technical approval rights for works in the highway, including consideration of verge, footways, pathways and the carriageway.
Wiltshire Council	Transport and access	13.13. It is the council's Highways Officer's view that the assumptions and approach to specifying the vehicle numbers which underpins the assessment of in-combination cumulative effects is considered to be sound. It is acknowledged that these vehicle movements may result in in-combination cumulative effects for other environmental disciplines, for example air quality, noise etc. This would be over and above the highway oversight of ensuring matters can be safely and suitably accommodated.	No	The comment is noted. In-combination effects between transport and access and other environmental impacts have been considered in Section 13.13 of Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and summarised in ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [En010168/APP/6.1].
Wiltshire Council	Transport and access	Wiltshire Council requires clarity on the following aspect of the scheme proposals: The exact locations of any Highway	No	Management measures relating to the Highway Improvement Areas, safety and suitability of vehicle routes, traffic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Improvement Areas and confirmation of whether it is the intention for these to be removed once the construction works have been completed or whether they will remain in situ. h) Assurance of the safety and suitability of anticipated vehicles movements in terms of route widths and passing. i) The exact details of any traffic management measures proposed. j) The exact site access points and any works required to facilitate this. Crosssections should be supplied to demonstrate permeability of access tracks and conformity to existing ground levels to not alter existing drainage conditions.		management, and accesses are set out within the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22]. The works will stay in place for the lifetime of the development and be used for decommissioning.
Wiltshire Council	Transport and access	8. The applicant must seek approval for all required permits, licenses and orders relating to works on or affecting the Local Highways Networks, including Public Rights of Way, from the Local Highways Authority in advance of works commencing.	No	The draft Development Consent Order [EN010168/APP/3.1] provides the Applicant with the powers required to implement the Scheme, and sets out the requirements for notification and agreement in respect of each power. The Applicant also provides provisions within the Outline Construction Traffic

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Management Plan (CTMP) [EN010168/APP/7.22] for Wiltshire Council to retain technical approval rights for works in the highway, including consideration of verge, footways, pathways and the carriageway.
Wiltshire Council	Soils and agriculture	Wiltshire Council requires clarity on the following aspect of the scheme proposals: A full arboricultural impact assessment, with associated tree constraints plans, tree protection plans and arboricultural method statement, which has been prepared in accordance with BS5837:2012 for both the construction and decommissioning phases. i) A detailed test regime to confirm which sites would or would not require soil remediation post construction. This should include details of intermediate remediation during construction to ensure that there is not an increase in flood risk resulting from soil compaction.	No	Soil compaction will be managed through the Soil Resource Management Plan (SRMP) [EN010168/APP/7.15]. The soil condition will be surveyed following the installation of the piles and prior to installation of the panels so that any compaction identified can be remediated. A full Arboricultural Impact Assessment with associated Tree Constraints Plans, Tree Impact Plans and an Outline Arboricultural Method Statement has been provided in Environmental Statement (ES) Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3], Figures 10-1-1 to 10-1-23 Tree Constraints Plans [EN010168/APP/6.2] and Figures 10-2-1

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				to 10-2-23 Tree Impact Plans [EN010168/APP/6.2]. Tree Protection Plans cannot be provided at this Development Consent Order (DCO) stage given that only a 'maximum design scenario' has been provided and sufficient detail on the exact location of scheme elements (for example open cut trenches for cabling) will not be available until technical design post DCO consent. Prior to decommissioning of the Scheme, a tree survey will be undertaken in accordance with BS 5837:2012 (or most recent updated standard and industry guidelines) of the Order Limits. An Arboricultural Impact Assessment will be produced alongside an Arboricultural Method Statement to guide the decommissioning works and ensure potential tree impacts are identified, mitigated and compensated for where appropriate.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Soils and agriculture	1. The site contains 30% Best and Most Versatile agricultural land. Both Core Policy 42 of Wiltshire Core Strategy and Core Policy 86 of the new Wiltshire Local Plan state that Best and Most Versatile land should not be used. This is also emphasised in the National Planning Policy Framework (NPPF) para 187 bullet b). There is no evidence that the applicant has looked for other potential sites for the provision of the solar farm to avoid the use of BMV land as required in order to justify its use. The proposals will also result in the loss of farming jobs.	No	Comment noted. Policy 42 of the CS and Policy 86 of the WLP do not state that BMV land should not be used, focusing on the need for applicants to demonstrate how environmental impacts have been assessed. NPPF paragraph 187b notes that the economic and other benefits of BMV land are relevant to the character of the countryside. The CS and WLP policies encourage renewable energy provided that various factors have been taken into account, one of which is BMV land. National Policy Statement for Energy EN-3 provides, at paragraphs 2.10.29 to 2.10.34, that land type should not be a predominating factor in determining the suitability of the site location, that development of solar arrays on BMV land is not prohibited, and that Applicants should explain their choice of site noting the preference or development on suitable brownfield, industrial, and low and medium grade agricultural land. NPS EN-3 recognises that it is likely that developments will use agricultural land and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				encourages the development and implementation of a soils resource management plan. The Applicant carried out a robust site selection process, reported in the Site Selection Assessment Report [EN010168/APP/6.3], and has developed an outline Soil Resource Management Plan (SRMP) [EN010168/APP/7.15] to avoid and minimise adverse effects to soil.
Wiltshire Council	Soils and agriculture	18. Best and Most Versatile (BMV) Agricultural Land Considerations Policy Context 18.1. The Overarching National Policy Statement (NPS) for energy (EN-1) provides guidance for developers of nationally significant energy infrastructure projects, advising that applicants should seek to minimise impacts on the best and most versatile agricultural land. Following its publication, in May 2024, a WMS was made by the Secretary of State for Energy Security and Net Zero. The WMS sets out further detail on balancing the competing	No	Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		priorities of energy security and food production including the following point: "Due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary." 18.2. The NPS and NPPF defines best and most versatile (BMV) agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. Footnote 65 of the NPPF expresses the following: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.		The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. National Policy Statement EN-3 Paras 2.10.24 & 2.10.25 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to

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				be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the Statement of Need [EN010168/APP/7.1] in particular in Section 4.3. Statement of Need Chapter 8 [EN010168/APP/7.1] provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.
Wiltshire Council	Soils and agriculture	18.3. Paragraph 013 (ID: 5-013-20150327) of the PPG includes the following summarised guidance: • The Local Planning Authority should encourage the effective use of land by focusing large scale solar farms on previously developed and non-agricultural land. • Solar farms are normally temporary structure and planning conditions can be used to ensure that the installations are removed when no longer in use and that the land is restored to its previous use.	No	As set out in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3], there is insufficient previously developed and non-agricultural land on which to site the Scheme. The Scheme is for a temporary period and the land will be returned to the landowner following decommissioning. The outline Soil Resource Management Plan (SRMP) [EN010168/APP/7.15] sets out the measures that would protect soils from harm and enable soil health to improve through the life of the Scheme by

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				converting intensive arable land to permanent pasture.
Wiltshire Council	Soils and agriculture	18.4. Policy CP42, criteria (viii) of the Wiltshire Core Strategy expresses the need for proposals for standalone renewable energy schemes to satisfactorily consider best and most versatile agricultural land.	No	Comment noted. Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] sets out that the availability of brownfield and non-BMV agricultural land was considered in identifying the site, and that the avoidance of BMV land was a key consideration in site selection. Detailed survey work has since confirmed that most of the land within the Scheme is not BMV land.
Wiltshire Council	Soils and agriculture	18.5. The Wiltshire Climate Strategy (2022-2027) includes the following objective relevant to the natural environment, food and farming: Efficient and environmentally sensitive use of land, providing for the needs of an increasing population and nature; food production, renewable energy generation, housing and transport alongside woodland creation and nature	No	Comment noted The Scheme would be sited on agricultural land by agreement with the landowners in such a way that it would generate renewable energy as well as helping to maintain the viability and encourage the diversification of farm businesses.

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		recovery. 18.6. Wiltshire Policy SCC3 to the Chippenham Neighbourhood Plan requires standalone renewable energy schemes to, inter alia, demonstrate that the costs and benefits compare favourably with potentially less intrusive options, such as large scale building mounted renewable energy and proposals for ground mounted solar to make most effective use of the land around arrays through demonstrating that agricultural use will continue, and/or by achieving a minimum of 10% BNG. It should be noted that the consultation documents suggest it will be only the underground cable connection to the Melksham sub-station which will pass through the Chippenham Neighbourhood Plan area.		
Wiltshire Council	Soils and agriculture	Consultation Documents 18.7. In this case, the Solar PV Sites extend to around 878ha, with Chapter 17 (Soils and Agriculture) to the PEIR suggesting it consists of mostly agricultural	No	All of the land proposed for the siting of solar panels, and accessible areas of the cable route, have now been subject to survey

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		land, primarily in arable use, with some areas of grassland in Lime Down B, Lime Down C and Lime Down E. The landform is typically level to gently sloping throughout. There is no reason to disagree with that description. 18.8. The PEIR also suggests that survey work of elements of the solar PV sites as well as the cable route search corridor have not yet been completed, but for the purposes of the PEIR, assessment has relied upon data from nearby areas which have been surveyed. The survey data obtained to date from the development area classifies around 30% of the agricultural land as BMV quality, mostly in grade 3a with a smaller proportion of Grade 2, and around 70% as Subgrade 3b and Grade 4 which is not BMV land. The areas of each grade confirmed by the survey work undertaken to date are set out within the consultation documents, and repeated below for convenience [see page 88 of Technical Response PDF for table] :		The survey details and results are set out in Environmental Statement (ES) Volume 3 Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3].

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Wiltshire Council	Soils and agriculture	18.9. From the evidence so far supplied, it is clear that a good proportion of the development area has yet to be surveyed, and that the survey data to date reveals a relatively high proportion of the land to constitute BMV agricultural land (i.e. some 30% being within grades 2 and 3a). Furthermore, whilst it is possible for the land to continue to be used productively for agricultural purposes during the operation of the solar PV, the PEIR assessment assumes there will be none, thereby taking account of a worst-case impact. 18.10. It is evident therefore, that the assessments so far undertaken suggest that the development will not entirely avoid BMV agricultural land. Whilst national policy does not preclude its use, given the continued assessments being undertaken, it will remain possible for the applicant to reduce the amount of BMV being used and to seek out previously developed and non-agricultural land, as is advised within the PPG. Clearly, should BMV agricultural land continue to be incorporated into the	No	Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] sets out that the availability of brownfield and non-BMV agricultural land was considered in identifying the site, and that the avoidance of BMV land was a key consideration in site selection. ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites.

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		development site, it will weigh against the proposals in the planning balance.		The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2].
Wiltshire Council	Soils and agriculture	18.11. It is unclear to what extent the development will impact upon the quality of agricultural soils and the ability for this land to be used for agricultural purposes beyond the lifetime of the development. It is recommended that the Examining Authority satisfy themselves that soil erosion would not result from this development.		The anticipated effects on agricultural land and soil resources are set out in Environmental Statement (ES) Volume 1 Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The soils will be managed according to best practice set out in the Outline Soil

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				Resources Management Plan (SRMP) [EN010168/APP/7.15] which is secured by a Requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1] .
Wiltshire Council	Soils and agriculture	18.12. From an economic perspective, and on the assumption that the arable production takes place on land other than Grade 4, that would equate to the loss of approximately 5000 tons of combinable crops, worth in the region of £750,000 per year. To put this in context, the UK produced 20 million tons of combinable crops in 2024, lower than normal due to the challenging weather conditions experienced in the growing season.	No	The Applicant has not specifically calculated the likely value of arable crops “lost” during the operational lifetime of the Scheme. Instead, Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] estimates a loss of £628,000 GVA per annum as a result of direct and downstream agricultural employment losses. This is anticipated to be exceeded by economic benefits from direct and indirect employment generated by the Scheme in the 20 km Study Area, equating up to £952,000 GVA per annum during the Scheme’s operational lifetime. The Scheme also allows for continued income for eligible landowners by way of ground rent in place of lost agricultural output.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Soils and agriculture	18.13. Due to a lack of information, the council is unable to assess the reduction in output from the grassland. However, the council are aware of the challenges currently facing the dairy, beef and sheep sectors and are of the opinion that profitability is currently marginal. The applicant states that there may be some grazing opportunities once the solar park is established which may offset the reduction in output from the current grassland, although this is considered to be unlikely. 18.14. It is however recognised, that one benefit of taking this land out of agricultural production for at least 60 years will be the improvement to soil health should this land revert to food production again, and the increased carbon sequestration that will occur compared with if it remains in its current use. An increase in biodiversity is also anticipated. Although, at this moment in time, it is very hard to monetarise these benefits.	No	The Applicant has not assessed the economic potential of grazing opportunities on the Scheme as this is optional and at the discretion of the landowner and Scheme operator rather than formally secured through the Development Consent Order (DCO). Furthermore, the economic potential for carbon sequestration or biodiversity net gain has not been assessed as the environmental benefit of these is considered of greater importance for the Environmental Statement (ES) [EN010168/APP/6.1]. The Scheme allows for continued income for eligible landowners by way of ground rent in place of lost agricultural output. In cases where this benefits farmers working in sectors with marginal profitability, this may go some way to improve reliability of income and financial stability of the farm holding.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Soils and agriculture	q) Conclusion of the agricultural land classification assessment for all parcels of land contained within the development proposals.	No	The applicant notes this comment. This has been set out within Environmental Statement (ES) Volume 1 Chapter 17: Soils and Agriculture [EN010168/APP/6.1] .
Wiltshire Council	Socioeconomics, tourism, recreation and health / Transport and access	• HULL5 (Grid references: 90130 83488, 90389 83811, 90411 83846 and 90436 83811) – The council will determine whether a piece of access furniture may be required at these locations.	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1] . Any additional requests for improvements to PRow access furniture can be explored through the Community Benefit Fund.
Wiltshire Council	Socioeconomics, tourism, recreation and health /	• MALW50 (Grid reference: 90818 83888) – The council will determine whether a piece of access furniture may be required at this location.	No	The Applicant notes the reference stated refers to a PRow that lies outside the Order Limits and is currently a dead-end at a watercourse.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	Transport and access			The Applicant has committed to the provision of a permissive route within the Order Limits that would be able to receive connection to MALW50 should a new crossing be implemented. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. Any requests for improvements to PRow access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual /	14. Public Rights of Ways (PRow) Considerations 14.1 The council notes that some of the biggest impacts of this development will be those placed upon the users of Public Rights of Way (PRow). Whilst it is	No	A detailed assessment of the likely significance of effects from the Scheme on individual PRow has been included in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	Transport and access	acknowledged that the development is proposed to be temporary in nature with an expected lifespan of 60 years, the impact on and enjoyment by these users could be considerable.		and Recreation Receptor Tables [EN010168/APP/6.3] . This assessment considers the impact on the practical use of PRoW and the impacts on the enjoyment and desirability of these routes as a result of the visual and character impacts of the Scheme.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.2 Therefore, it is considered that this scheme provides significant opportunities to tackle one of the biggest problems on the PROW network, which is fragmentation of Footpaths and Bridleways, which terminate on roads forcing users onto the road or verges until they can rejoin another PROW. The creation of additional PROW could be of considerable benefit to PROW users, especially if MALW50 and GSOM15 were able to be linked into the PROW network. These two footpaths currently terminate at a point where no onward highway rights exist.	No	The Applicant confirms that direct consultation has been held with the Public Rights of Way Team at Wiltshire Council to determine how the Scheme can improve PROW network connectivity. Resultantly, the Applicant has committed to a series of permissive paths within the Solar PV Sites as part of the Scheme, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. With respect to MALW50 and GSOM15, the Applicant notes these PRoW lies outside the Order Limits. Any requests for improvements to PRoW access furniture or

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				new connections outside the Order Limits can be explored through the Community Benefit Fund if able to be facilitated by Wiltshire Council and the relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.3 It is noted that the applicant refers to permissive paths. However, given that permissive routes could be removed in 60 years' time once the scheme is decommissioned, it is considered that routes should be dedicated so that they become permanent additions to the PROW network, where possible.	No	At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft Development Consent Order (DCO) [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape	14.4 The council notes that further clarity is required on the impacts to PROW resulting from the cable connection route and the applicant's stated intention to provide this information within the ES.	No	The Applicant confirms that impacts on PROW within the Cable Route Corridor are assessed in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	and visual / Transport and access			[EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3].
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.5 The council welcomes the applicant's intention to submit an outline Public Rights of Way Management Plan (PRoWMP) with its DCO application. The council reserves the right to comment on the proposed management arrangements once this more detailed information is available.	No	The Applicant confirms that an Outline PRoW Management Plan (PRoWMP) [EN010168/APP/7.17] has been submitted as part of this Development Consent Order (DCO) Application to which Wiltshire Council will be able to make further comments through the DCO examination process. Furthermore, provision of a detailed PROWMP substantially in accordance with the submitted Outline PRoWMP [EN010168/APP/7.17] , is secured by requirement in the Draft DCO [EN010168/APP/3.1] , to which Wiltshire Council will be the relevant authority for discharging that requirement.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual /	14.6 The council's proposals in relation to the solar sites are outlined in the following sections. Further opportunities may be identified as the scheme designs are further developed.	No	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	Transport and access			Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] .
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	Lime Down Site A: 14.7 There are two PROW within the Lime Down A site being: Public Footpath SHER15 and Public Bridleway SHER16. Three PROW connect with or are in the immediate vicinity of the site. These include: Public Footpath SHER14, Public Footpath SHER17 and Public Footpath SHER13. Additionally, there are PROW which are near the Lime Down A site being: Public Footpath SHER11 and Public Footpath SHER12. 14.8 Figure 1 displays the Site Extent of Lime Down A below: [See figure 1 in WC PDF]	Unlikely	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects discussions held with WC and the respective landowners on the Scheme to incorporate network improvements. New permissive paths have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		14.9 The Lime Down A component of the scheme provides an opportunity to link Bridleway SHER16 with Bridleway SHER14 if a Public Bridleway was created by following a route of A-B-C-D. It might also be possible to divert a section of SHER15 onto the field edge to improve the management of the land. A new Public Footpath from point G-F could link SHER14 to SHER16, which is considered would create a nice circular route option. These are shown on Figure 2 below: [See figure 2 in WC PDF]		has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.10 The council considers that the following improvements would be necessary: • SHER15 (Grid references: 56828 85286 and 86654 85182) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations (albeit acknowledging that “[ST] 56828 85286” appears to be a typo and request confirmation as to where this point is meant to refer to), and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • Off site works should include access furniture upgrades to SHER13, SHER11 and SHER10 pending an inspection of the Public Footpaths.		as set out in the Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. Any additional requests for improvements to PRow access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	Lime Down Site B: 14.11 There are two PRow within the Lime Down B site being: Public Footpath NORT5 and Public Footpath NORT11. Six PRow connect with or are in the immediate vicinity of the site. These include: Byway Open to All Traffic SHER37, Public Footpath SHER15, Public Footpath SHER13, Public Footpath SHER11, Byway Open to All Traffic EGRE1 and Public Bridleway NORT11. Additionally, there are PRow which are near the Lime Down B site being:	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Byway Open to All Traffic NORT6, Public Footpath NORT4, Public Footpath SHER14, Public Bridleway NORT2 and Public Footpath NORT9. 14.12 Figure 3 displays the Site Extent of Lime Down B below: [See figure 3 in WC PDF] 14.13 The proposals regarding Lime Down B, offer a very welcomed opportunity to link Public Bridleway NORT11 to Byways Open to All Traffic EGRE1 and SHER37, which could then in turn link the user to Bridleway SHER16 via a link through the Lime Down C site. This route is shown in Figure 4 below as A-B-C-D and A-B-E-F. [See figure 4 WC PDF]		[EN010168/APP/6.2]. At present, the Applicant is only able to commit to permissive paths for pedestrians on Lime Down B, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape	14.14 The council considers that the following improvements would be necessary: • NORT5 (Grid reference: 87677 84841) –	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations (NORT1 only), and will incorporate any access furniture needs as part of the detailed

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	and visual / Transport and access	Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • NORT5 (Grid reference: 87492 84793) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a bridle gate if the route is to be upgraded to a Bridleway. If this is not possible, then a pedestrian or kissing gate should be installed only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • NORT1 (Grid references: 88920 85202 and 88815 84750) – If livestock is going to be present, then a pedestrian gate or kissing gate will be required. Any access		design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan (PRoWMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. Any additional requests for improvements to PRow access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • Off site improvements may be required to NORT5, NORT1, SHER15, SHER13 and SHER11 pending a site visit to assess access furniture.		
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	Lime Down Site C: 14.15 There are six PROW within the Lime Down C site being: Public Footpath HULL23, Byway Open to all Traffic LUCK57, Byway Open to all Traffic SHER35, Public Footpath SHER18, Public Footpath HULL25 and Public Footpath HULL26. Eight PROW connect with or are in the immediate vicinity of the site. These include: Public Footpath HULL24, Public Footpath LUCK43, Public Footpath LUCK42, Public Footpath LUCK45, Public Footpath LUCK35, Public Footpath SHER17, Public Bridleway SHER16 and Byway Open to All Traffic SHER37. Additionally, there are PROW which are near the Lime Down C site being: Public	No	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] . At present, the Applicant is only able to commit to permissive paths and routes, due

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Footpath HULL13, Public Footpath HULL17, Public Footpath HULL20, Public Footpath GRIT32, Public Bridleway GRIT22 and Public Footpath GRIT26. 14.16 Figure 5 [See page 67 of Technical Response PDF for Figure 6] displays the Site Extent of Lime Down C below:		to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.17 The proposals regarding Lime Down C, create an opportunity to create a new Public Bridleway on the west side of the Fosse Way. This could link the following public rights of way: GRIT22, LUCK57, SHER18, HULL16, SHER37. This is shown on Figure 6 below [see page 68 of Technical Response PDF for Figure 6]: 14.18 The proposals regarding Lime Down C also create an opportunity to provide a new Public Footpath. This route is shown on Figure 7 [see page 69 of Technical Response PDF for Figure 7] below as A-B	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and would link HULL23 with LUCK57. The council suggests that this is located on the south of the hedge and panels due to the user having improved views and also due to the access point onto the road		[EN010168/APP/6.2]. At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.20 HULL23 (Grid reference: 87418 82924) would require improvement to install a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created with a new signpost.	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way (PRoW) Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRoW Management Plan

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		14.21 Additionally, at HULL23 (Grid reference: 87917 82693), whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created.		(PRoWMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1] . Any additional requests for improvements to PRoW access furniture can be explored through the Community Benefit Fund.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.25 The council considers that the following improvements would be necessary: • SHER18 (Grid references: 85848 83607, 86217 83546, 86332 83378 and 86490 83280) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created.	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way (PRoWMP) Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRoW Management Plan (PRoWMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• HULL25 (Grid references: 86491 83264 and 86831 83451) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • HULL26 (Grid reference: 86938 83922) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • Off site improvements may be required to SHER17, SHER18, LUCK35, LUCK43, LUCK42, LUCK45, GRIT26, GRIT32, HULL20, HULL23, HULL24, HULL17 and HULL13 pending a site visit to assess		Any additional requests for improvements to PRoW access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		access furniture. 14.26 The council advises the applicant that the working copy alignment of SHER18 has changed and therefore should be checked to ensure it is plotted correctly.		
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.32 The council considers that the following access furniture improvements would be necessary: • HULL1 (Grid references: 89366 83142, 89216 83421 and 89191 83458) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • HULL1 / NORT10 (Grid reference: 89087 83583) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1] . Any additional requests for improvements to PRow access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • NORT10 (Grid reference: 88808 83920) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate of kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created.		
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	• HULL2 (Grid references: 89416 83762 and 89870 84114) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • HULL2 (Grid references: 89775 84012	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRowMP [EN010168/APP/7.17] which is secured by requirement in the Draft DCO [EN010168/APP/3.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and 89771 84067) – The council will determine whether a piece of access furniture may be required at these locations. Furthermore, Grid reference 89771 84067 may require a culvert.		Any additional requests for improvements to PRow access furniture can be explored through the Community Benefit Fund.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	• HULL4 (Grid references: 90110 84057 and 90086 83898) – Whilst the structure of the stile will need to be checked, the stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created. • HULL4 (Grid references: 90068 83840, 90081 83522 and 90042 83397) – The council will determine whether a piece of access furniture may be required at these locations.	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] which is secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. Any additional requests for improvements to PRow access furniture can be explored through the Community Benefit Fund.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.35 It is considered that a bridleway link could be created from Seagry Wood into the site SEAG23 / GSOM9 as the PROW network can often be fragmented with the road network often having to be used to connect Footpaths and Bridleways. Bridleway GSOM9 / SEAG23 runs within 40m of the southeast corner of the Lime Down E site. If a link could be created to the bridleway and the applicant dedicates bridleways around the south and east of the development, this would create a good local network for the people most impacted by the development. It would also allow a circular route using SSTQ7, SEAG23, MALW61 and SSTQ4 which would be about 3.7km. It is acknowledged that Seagry House would need to agree for this to be possible. 14.36 Furthermore, a Bridleway could be created up the east side of the Lime Down E site to link with MALW64 near Cleeve House. Please see Figure 15 [see page 76 of Technical Response PDF] below: 14.37 Additionally, part of GSOM11 and	No	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have not been able to be included in the Scheme design for Lime Down E33 and E34 as they require connections that fall outside the Order Limits to be able to function. That notwithstanding, space has been left along the eastern boundary of fields E33 and E34 (understood as a former drover's trail between Seagry Wood and Cleeve House) is to be informally retained as available for permissive access throughout the lifetime of the Scheme. Any additional requests for improvements to PROW access arrangements, or permissive routes outside the Order Limits can be explored through the Community

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		GSOM15 could be upgraded to a Bridleway or extend GSOM10 to meet Lime Down E as a Bridleway, which may result in the possibility to extinguish the north part of GSOM11 in exchange for network improvements. This is illustrated on Figure 16 [see page 77 of Technical Response PDF] below. It is acknowledged that Grove Farm would need to agree.		Benefit Fund in coordination with the Wiltshire Council and relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.39 The proposed development on Lime Down E also provides the opportunity to link MALW59 to MALW61 (Figure 18). The western end of MALW59 terminates at the A429 (Figure 19). There is very limited highway verge at this location with over 650m of the A429 needing to be traversed to the south before being able to join a quieter and slower speed section of highway. Over 650m of the A429 also needs to be traversed to the north before the turning to Hullavington. Please see Figures [Figures 18 and 19 can be seen on page 78 of Technical Response PDF] below.	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. At present, the Applicant is only able to

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual / Transport and access	14.40 The council considers that the following access furniture improvements would be necessary: • MALW62 (Grid references: 92440 81380 and 92770 81690) – The stile should be replaced with a pedestrian gate or kissing gate only if stock is to be present either side of the hedge. Any access furniture will need to be authorised with a Section 147 application for erecting a structure on the highway. If no livestock are envisaged, then a gap should be created.	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] which is secured by requirement in the Draft

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• MALW62 (Grid reference: 92631 81590) – A culvert will need to be installed. • MALW60 – A site visit is required to be undertaken to assess access furniture. The provision of access furniture may be required. • Off site improvements may be required to MALW55, GSOM15, MALW65 and MALW63. A site visit is required to be undertaken to assess access furniture at these locations. The provision of access furniture may be required. Additionally, the council would request a contribution with regard to SSTQ5 to allow for the replacement of the stile (Grid reference: 91758 80960) with more accessible piece of access furniture, if required for the control of livestock.		Development Consent Order (DCO) [EN010168/APP/3.1]. Any additional requests for improvements to PRoW access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Landscape and visual	14.19 The council notes that the position of HULL23 (Figure 8 below [see page 69 of Technical Response PDF for Figure 8]) on the ground appears to be different to the Definitive Map line. The council's PROW officer suspects that the sign-post is about 60m to the south of where it should be.	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission takes into account the position of both the Definitive Map Line for HULL23 and the de facto trodden route to ensure neither route is disadvantaged by the design of the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		However, it is noted that the indicative Site Layout Plan appears to show the footpath in the correct position.		The Applicant welcomes coordination with the landowners, and Wiltshire Council to determine if the Community Benefit Fund is requested to reinstate the footpath to the Definitive Map route..
Wiltshire Council	Socioeconomics, tourism, recreation and health / Consultation and engagement	19. Public Health Considerations Response Context 19.1 It is acknowledged that the PEIR identifies those measures the applicant is proposing to reduce, enhance and improve the effects the proposed development may have on the environment, including on human health. Chapter 18 of the PEIR specifically addresses human health, which the council notes should be read in conjunction with other chapters being: Chapter 7 (Climate Change), Chapter 8 (Landscape and Visual Impact), Chapter 11 (Hydrology, Flood Risk and Drainage), Chapter 13 (Transport and Access), Chapter 14 (Noise and Vibration), Chapter 15 (Air Quality), Chapter 16 (SocioEconomics, Tourism and Recreation), Chapter 19 (Ground	No	The Applicant notes these comments, and awaits the council's full comments following publication of the Development Consent Order (DCO) submission documents. In the meantime, the Applicant confirms their human health consultant and Wiltshire Council Public Health team have been in direct communication. This is documented in Environmental Statement (ES) Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3] . The topics noted in the comment have been signposted with ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] to be read in conjunction with the chapter.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Conditions and Contamination), and Chapter 20 (Other Environmental Matters), specifically section 20.7: Major Accidents and Disasters. 19.2 Given that the scheme's approach and design is still evolving, and the council's observations and issues on other environmental topics are contained within other sections of this consultation response, the council's comments on public health matters have primarily been limited to the information contained within Chapter 18 at this time. Further consideration of these matters by the council will be undertaken upon DCO submission.		
Wiltshire Council	Socioeconomics, tourism, recreation and health / Consultation and engagement	Consultation Documents 19.3 The council acknowledges that the PEIR reflects its initial comments, and those of the Office for Health Improvement and Disparities (OHID), provided to the applicant at the EIA scoping stage. It is also considered that the applicant is including all the relevant and necessary areas for consideration. 19.4 However, where the report looks to	No	The Applicant has considered these comments, and through additional consultation with Wiltshire Council's Public Health team sought to improve consultation and community engagement in the pre-Development Consent Order (DCO) submission stage to improve community responses to the DCO process and eventually during the working lifetime of the Scheme. This has been set out in detail in

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		reduce, enhance and improve the effects on human health, the council considers that the applicant does not consider proactive efforts to assist the communities in managing their wellbeing throughout the statutory consultation phase, the formal DCO process and the construction phases of the development. In the absence of specific national guidance, the council's comments are based on the recommendations found in the Community Engagement and Wellbeing Supplementary Guidance Document and Suffolk County Council P.G.17 Promotion of Good Emotional Health and Wellbeing, which the applicant also refers to. As a NSIP Centre for Excellence, Suffolk have provided detailed guidance in this area, which in the absence of a Wiltshire Council equivalent, has guided the council's comments.		Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] and in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3].
Wiltshire Council	Socioeconomics, tourism, recreation and health /	19.5 It is noted that over 1,400 responses have been submitted, and several community groups have mobilised due to concerns about the project. This will place	No	The Applicant acknowledges the level of community concern and anxiety of the Scheme and has sought to respond to these concerns in the information provided,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	Consultation and engagement	significant pressure on local political leaders (parish councils and local councillors) and increase anxiety among residents who feel affected by the development. 19.6 According to the preliminary environmental report (Volume 3, Appendix 18-3: Human Health Preliminary Assessment, January 2025, Table 3, p. 19), a Community Liaison Officer will be appointed. 19.7 Whilst the council supports the creation of a Community Liaison Officer to manage communication and address complaints throughout the application and construction stages, this role does not specifically address mental health and wellbeing and potentially does not act independently to the applicant. Therefore, in line with the Suffolk guidance, consideration should be given to the employment of an independent third party to act as a “relationship manager” between the applicant, local authorities, and the		updates to the Scheme design, and through the mitigation and enhancement measures secured through the Development Consent Order (DCO) management documents. The Applicant confirms a Community Liaison Officer is committed for the Scheme's construction, peak replacement event(s), and decommissioning, secured respectively through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13], and Outline Decommissioning Statement (DS) [EN010168/APP/7.14] by way of requirements in the Draft DCO [EN010168/APP/3.1]. The Applicant has engaged further with Wiltshire Council Public Health to understand the role of a community relationship manager, and has agreed with Wiltshire Council that while the specific role

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		impacted communities to ensure conversations remain positive and helpful.		need not be independent, that similar responsibilities should be maintained by the existing Scheme communications team. This is documented in Environmental Statement (ES) Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3] .
Wiltshire Council	Socioeconomics, tourism, recreation and health / Consultation and engagement	19.8 Again, in accordance with the Suffolk guidance, the council considers that alongside effective communication about the proposed changes, communities should also be proactively helped to maintain their own wellbeing throughout the process, through provision of good quality information and support. The applicant should consider the 'empowering communities' Key Performance Indicator's (KPI) as set out in Appendix 1 of the above reference Suffolk County Council document as examples of good quality information and support in the management of community mental health and wellbeing.	No	In consultation with Wiltshire Council's Public Health Team, as documented in Environmental Statement (ES) Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3] , the Applicant has explored ways to ensure members of impacted communities have access to mental health resources during and following the Development Consent Order (DCO) process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Socioeconomics, tourism, recreation and health / Consultation and engagement	19.9 Additionally, the council would like to draw the applicant's attention to the availability of local population profiles for consideration in any further assessment on this topic. A new data source, the Population Health Profiles (2024/2025), was published in January 2025 and is available through the Library Wiltshire Intelligence. These profiles, created for each of Wiltshire's 13 Primary Care Networks (PCNs), provide valuable information to help guide primary care in identifying and addressing health inequalities within their patient populations.	Yes	The Applicant confirms that the baseline data in Section 18.7 of Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] has been gathered down to ward level where available to determine baseline conditions in the 2 km Study Area for human health, using Population Health Profiles published by Wiltshire Intelligence in Jan 2025.
Wiltshire Council	Socioeconomics, tourism, recreation and health / Transport and access	• HULL6 / MALW49 (Grid reference: 91150 83934) – The council will determine whether a piece of access furniture may be required at this location. • HULL6 (Grid references: 90989 83874, 90794 83502, 90293 83378, 90367 83344 and 90876 83346) – The council will determine whether a piece of access furniture may be required at these locations. The bridges will also need to be	Yes	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations, and will incorporate any access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRow Management Plan [EN010168/APP/7.17] which is secured by requirement in the Draft Development

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		checked at Grid references 90989 83874 and 90293 83378.		Consent Order (DCO) [EN010168/APP/3.1]. Any additional requests for improvements to PRoW access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health	14.22 A new Public Bridleway (shown in Figure 9 below [page 70 of Technical Response PDF]) should be created linking A-C-B, which will link Alderton and Luckington to LUCK57. A new Public Footpath should also be created between points D-C as this would create a circular route connecting with LUCK45.	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health	14.23 The council's PROW Officer is unsure whether SHER18 is available on the definitive line through Cream Gorse, therefore this proposal would give the option of improving the connectivity of the network and also improve land management. It may be possible to divert SHER18 onto the route A-B-D-E-F shown in Figure 10 [page 70 of Technical Response PDF] below, which would also improve connectivity with HULL25. A Public	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES)

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Footpath dedicated along the route of A-B-C would also add to the connectivity of the public rights of way network.		Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health	14.24 The council considers that it would be helpful to create a link from HULL24 to HULL23, as this would create a circular route to the west of Hullavington village. It would also be possible to create a circular route of approximately 5km from the village via HULL1, HULL16, HULL13, HULL24 new	No	At present, the Applicant is not able to commit to a permissive path in this location. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council at a later opportunity.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		footpath, HULL23, HULL13, HULL12 and HULL15. This route would have no road walking with just a couple of roads to cross.		
Wiltshire Council	Socioeconomics, tourism, recreation and health	Lime Down Site D: 14.27 There are six PROW within the Lime Down D site being: Public Footpath HULL1, Public Footpath NORT10, Public Footpath HULL2, Public Footpath HULL4, Public Footpath HULL5 and Public Footpath HULL6. Five PROW connect with or are in the immediate vicinity of the site. These include: Public Footpath HULL8, Public Bridleway HULL7, Public Bridleway MALW51, Public Footpath MALW49 and Public Footpath MALW50. Additionally, there are PROW which are near the Lime Down D site being: Public Footpath NORT4, Public Bridleway MALW44, Byway Open to All Traffic MALW46 and Public Footpath MALW52. 14.28 Figure 11 [see page 72 of Technical Response] displays the Site Extent of Lime Down D below:	No	The Applicant confirms that these PROWs have been identified on or adjacent to Lime Down D.
Wiltshire Council	Socioeconomics, tourism,	14.29 There is the opportunity within Lime Down D to link several Public Footpaths	Yes	The Applicant confirms that the Scheme design for Development Consent Order

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	recreation and health	with an east west Public Footpath as it is noted that the site is quite well covered for north south PROW. It is considered that two additional PROW would provide some very welcomed new route options. It may also be possible to connect MALW46 with HULL7, but this will require further assessment by the council.		(DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health	14.30 A new Public Footpath to link HULL2, HULL4, HULL5, HULL6 and MALW50 should be created between points A-B (as shown as the orange line in Figure 12 below [see page 72 of Technical Response]). It is considered that this possible route would avoid the solar panels. 14.31 The council also considers that a new Public Footpath should be created between HULL1 and HULL2 as shown on Figure 13 below [see page 73 of Technical Response]. HULL2 is currently isolated from the PROW network at its western end. The nearest public footpath is over 400m to the north along Norton Road and to the south, it is over 700m before a connection with another PROW. If the applicant was to dedicate a new Public Footpath between HULL1 meeting Norton Road opposite HULL2, this would increase the walking options in the area, opening more circular route options. Furthermore, it is noted that there is a housing development of up to 71	Yes	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. At present, the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		units in construction at the southern end of HULL1, therefore it would be of benefit to the new residents.		However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time.
Wiltshire Council	Socioeconomics, tourism, recreation and health	Off site improvements may be required to HULL1 between the site and HULL3, to HULL2 and HULL4 at Bradfield Wood and to HULL8 and MALW52. Improvements may also be required to NORT10, NORT4, HULL5, MAL	No	The Applicant awaits the Wiltshire Council Public Rights of Way Teams specific requirements at these locations. Any additional requests for improvements to PROW access furniture outside the Order Limits can be explored through the Community Benefit Fund in coordination with the relevant landowners.
Wiltshire Council	Socioeconomics, tourism, recreation and health	Lime Down Site E: 14.33 There are six PROW within the Lime Down E site being: Public Bridleway and Brown Track MALW54, Public Footpath MALW60, Public Footpath MALW68, Public Bridleway and Brown Track MALW59, Public Bridleway MALW61 and Public Footpath MALW62. Three PROW connect	No	The Applicant confirms that these PROWs have been identified on or adjacent to Lime Down E.

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		with or are in the immediate vicinity of the site. These include: Public Footpath SSTQ5, Public Bridleway SSTQ4 and Public Footpath GSOM15. Additionally, there are PROW which are near the Lime Down E site being: Public Bridleway SEAG23 GSOM9, Public Bridleway GSOM10, Public Footpath GSOM11, Public Footpath MALW64, Public Footpath MALW63, Public Footpath MALW65 and Public Footpath MALW55. 14.34 Figure 14 [see page 75 in Technical Response PDF] displays the Site Extent of Lime Down E below:		
Wiltshire Council	Socioeconomics, tourism, recreation and health	10. Given the amenity issues highlighted, we are concerned that the effective 'industrialisation' of the countryside could result in further impact on residents in terms of the long-term mental health in what has always been a rural setting.	No	Impacts on mental health and wellbeing are assessed in Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] which concludes that concludes no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. This includes specific assessment of the impact of the Scheme on community identity and

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				culture, and the likely mental health impacts of changes to these. Priority has been given in the assessment to the communities most immediately affected by changes to their visual and landscape setting. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has explored ways to ensure members of impacted communities have access to mental health resources during and following the Development Consent Order (DCO) process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team.
Wiltshire Council	Socioeconomics, tourism,	14.38 It may also be possible to divert MALW64 from its current alignment to a route following the field edge around the	No	The Applicant confirms that the Scheme design for Development Consent Order (DCO) submission reflects feasible and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	recreation and health	solar farm. This path could also be upgraded to a Bridleway as well to improve the bridleway network connectivity. It is noted that there are several possible route options, which could be considered. Figure 17 [see page 77 of Technical Response PDF] below illustrates one of them.		practicable outcomes from discussions held with Wiltshire Council and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have not been able to be included in the Scheme design for Lime Down E33 and E34 as they require connections that fall outside the Order Limits to be able to function. However, the Applicant does not discount the opportunity for this position to be revised in coordination with the landowners, and Wiltshire Council once the Scheme has been commissioned and operational for some time. Any additional requests for improvements to PRow access arrangements, or permissive routes outside the Order Limits can be explored through the Community Benefit Fund in coordination with the Wiltshire Council and relevant landowners.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Socioeconomics, tourism, recreation and health	Community Benefit Fund: 14.41 The applicant has indicated that a Community Benefit Fund may be available for this scheme. This is of interest to the council as a means to improve the PROW network for the benefit of the residents of Wiltshire. For example, funding could be utilised to improve access furniture and the surface condition of some routes. Furthermore, depending on the sums involved, it could be utilised to improve the connectivity of the network away from the development site. 14.42 The council requests that the applicant considers whether an annual grant could be made available so that work could be planned (and schemes which require a larger sum could be planned over a couple of years). The council notes that the Cotswold AONB is located on the other side of the road from Lime Down Site C, and The Macmillan Way, which is a long-distance path, is located within 1km of the site as well.	Yes	The Applicant confirms a Community Benefit Fund will be made available in relation to this Scheme, albeit agreed and operated separately from the Development Consent Order (DCO) process. Wiltshire Council recommendations for offsite PROW improvements can be contributed towards in agreement with relevant parish councils or community bodies. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability individual PROW, the Cotswold National Landscape, and long-distance recreational routes has been included in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Socioeconomics, tourism, recreation and health	17. Economic Considerations 17.1. Chapter 16 (Socio-Economics, Tourism and Recreation) of the PEIR indicates that the main economic impact of the scheme will be during the two-year construction of the solar park, followed approximately thirty years later by the decommissioning of the original solar panels and the installation of new ones. As yet, there are no plans for the site following the final clearance of the solar panels in sixty years' time.	No	Following decommissioning, the Development Consent Order (DCO) commits to the sites being restored to agricultural use as its existing condition. This is secured in the Outline Decommissioning Statement (DS) [EN010168/APP/7.14] by way of requirements in the Draft DCO [EN010168/APP/3.1] .
Wiltshire Council	Socioeconomics, tourism, recreation and health	17.2. With regard to the employment impact of the scheme, the applicant projects that there will be 194 full time equivalent (FTE) employees per annum during the construction phase, with a peak of 558 FTE. The applicant suggests that based on analysis undertaken this could provide 145 FTE jobs for local residents, with a peak of 205 FTE jobs for local residents. The council has some concerns that these figures may be optimistic but acknowledge that this is not an exact science. It is noted that there will be further jobs created via the	No	The Applicant is confident that the baseline data used to inform the assessment of socio-economic impacts in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] is robust and uses the most up-to-date information available. Where older data sources are used, (such as the 2016 Accommodation Stock Audit) this is done in parallel with more-up-to-date datasets such as monthly accommodation vacancy reporting (Visit Britain, 2025), and annual accommodation

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		supply chain, however the council considers it unlikely that this will have a local benefit.		industry information (BRES, 2023) to ensure the data is still applicable to the current baseline. Extended baseline information is also provided at Section 1.3 of ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation Legislation, Policy, Guidance, and Supporting Information [EN010168/APP/6.3] . The Applicant furthermore commits to promoting and supporting local procurement and investment through the Outline SSCEP [EN010168/APP/7.20] .
Wiltshire Council	Socioeconomics, tourism, recreation and health	17.3. The applicant suggests that up to 20 FTE jobs will be lost in the agricultural sector due to the change of use of the land. Whilst this is disappointing, there is a shortage of agricultural staff so if this is the case, the council does not feel they will find it hard to find alternative employment in the sector. It could be the case that the loss of land on some holdings, particularly on tenanted farms, may make the holding unviable but this level of detail is not	No	An assessment of likely agricultural job losses as a direct result of the Scheme and as a result of supplier and downstream industry losses, has been assessed in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supported by specific assessment of agricultural circumstances in ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] .

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		available to the council in the information provided.		
Wiltshire Council	Socioeconomics, tourism, recreation and health	17.4. It is noted that the applicant anticipates that this scheme will generate an uplift of £1.40m Gross Value Added (GVA) per annum to the UK economy for the duration of the project, and an uplift of £1.8m GVA per annum locally. The local GVA is mainly from the ground rents to be paid to landowners and some spend in the hospitality sector, for example, accommodation, daily needs of staff when needed at the site etc. 17.5. The applicant suggests that the scheme will provide an uplift of £21.1m GVA per year to the UK economy during the construction phase, of which £15.9m GVA will be generated in the study area. The study area is within 20km of the project and includes parts of Bath and NE Somerset, Cotswold, Somerset, South Gloucestershire, Stroud, Swindon and Wiltshire. These are not insignificant figures, and the council hopes that local suppliers will be part of the supply chain,	No	The Applicant notes these comments. A full assessment of economic effects in the Study Areas agreed is presented in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		but notes the total current GVA of the study area is £67.3 billion. (This includes all of Somerset as data for Mendip was not available to the applicant).		
Wiltshire Council	Socioeconomics, tourism, recreation and health	17.6. However, the applicant has not been able to show the impact this project would have on the tourist sector to date and has indicated that this assessment would take place in the ES. The applicant does acknowledge that tourism is an important part of the local economy and that this scheme might have some limited impact on visitor numbers and spend. There may also be some visitor displacement during the construction phase as many of the local accommodation providers will be used by construction staff who do not live locally. It is however considered that this will be a benefit to those who offer accommodation as they will experience increased occupancy throughout the construction phase.	No	A detailed assessment of the likely significance of effects from the Scheme on individual PROW, tourism destinations, recreational features, and the economic impact to the tourism economy has been included in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3] . This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme.
Wiltshire Council	Socioeconomics, tourism,	17.7. The council considers that the impact of this scheme on recreation will need	No	The Applicant confirms that these considerations on the impacts to PROWs

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	recreation and health	further consideration as there are a significant number of public rights of ways that will be impacted by this development, both in the solar park and along the route of the cable connection. However, as the final route of the cable connection has yet to be determined, exactly which PROW's will be impacted is impossible to determine at the current time. The applicant considers the impact to be either moderate / minor adverse effect or, predominantly, minor adverse effect. Whether those wishing to use these PROW's will be of the same mind is a moot point. The council considers that a considerable amount of work will have to be done, particularly with the PROW's effected within the solar park, to ensure that the ability of local residents and other users of these PROW's to enjoy the full benefits that are currently available continue if this scheme is consented.		have been assessed in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3] . The Applicant has furthermore committed to a series of permissive paths within the Solar PV Sites as part of the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] . These permissive paths have been proposed in consultation with the Wiltshire Council Public Rights of Way Team.
Wiltshire Council	Socioeconomics, tourism, recreation and health	17.8. In conclusion, whilst there are some economic benefits to the local area of this scheme, both in terms of jobs created and uplift in GVA within the study area, which	No	The Applicant notes these comments. A full assessment of economic effects in the Study Areas agreed is presented in Environmental Statement (ES) Volume 1,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		predominantly occur during the construction and decommissioning phases, the council considers that over the full lifespan of the project the economic benefits are marginal. However, this is subject to further work to be done on the impact on tourism and the benefits from increased biodiversity and carbon sequestration. 17.9. The main benefits locally over the scheme's lifetime will be to landowners, though this may change if the prices of agricultural products change dramatically in the coming years. It will ensure the viability of agricultural holdings which in itself will mean local businesses will be able to continue to invest and spend locally, create jobs and continue to support the local economy. 17.10. The economic implications resulting from the loss of agricultural land are considered in the following section.		Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1].
Wiltshire Council	Socioeconomics, tourism, recreation and health	k) The exact details of any amendment to or creation of Public Rights of Way within the scheme area. This should include its alignment, and any provisions required i.e.	No	An Outline PRow Management Plan (PRowMP) [EN010168/APP/7.17] has been prepared and is secured in the draft

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		access furniture, to ensure its safe operation, as well as their treatment in relation to security fencing.		Development Consent Order (DCO) [EN010168/APP/2.5].
Wiltshire Council	Socioeconomics, tourism, recreation and health	t) A full assessment of likely impacts on tourism arising from the scheme.	No	A detailed assessment of the likely significance of effects from the Scheme on individual PRoW, tourism destinations, recreational features, and the economic impact to the tourism economy has been included in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3] . This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme.
Wiltshire Council	Site selection and alternatives	The grid connection for the site is 13 miles away from the solar farm itself. This highlights two serious concerns:	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• Firstly, there would be appreciable environmental and ecological harm as well as disruption caused by the laying of 13 miles of cable across the countryside and the associated works to lay it. This is only seen as essential because of the location of the farm in relation to the grid link. This is an unacceptable degree of harm to accommodate what is clearly an unsustainable location for a solar farm. • The fact that there is no local grid connection or potential for a grid connection highlights that the proposed solar farm is in an unsustainable location for the proposed usage. A solar farm should be located close to a grid connection. The fact that no evidence can be shown of attempts to locate the farm closer to the grid connection demonstrates that this is being driven by the availability of land for solar development rather than the suitability of land for solar development and on that basis, it should be rejected.		Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 12 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 12 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. The Applicant took cable connection distance into consideration when determining the search area for sites, and 20km was considered be a viable cable connection distance for a solar Scheme of this scale. Environmental impacts arising from the temporary works required within the Cable Route Corridor have been fully assessed in the ES [EN010168/APP/6.1] accompanying the application.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Site selection and alternatives	5. Strategic Planning Considerations 5.1. The applicant has supplied a Site Selection Assessment Report (Volume 3, Appendix 4-2) within the consultation documentation. 5.2. Whilst it is accepted that national planning policy / guidance does not prescribe a site selection methodology to address solar development, there are nonetheless a set of land use planning considerations that influence site selection. 5.3. It is noted that the applicant's site selection process runs to five stages and includes the consideration of typical planning constraints.	No	Comment noted.
Wiltshire Council	Site selection and alternatives	5.4. Nonetheless, in the case of the Lime Down Solar Park proposed scheme, the site selection methodology appears to be significantly influenced by available points of connection (POC) into the national electricity transmission system (NETS). It is considered that this makes sense as it potentially reduces costs and risks.	No	Noted. Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3] confirms that site selection began with the Applicant identifying an available point of connection at Melksham with an import/export capacity of approximately 500MW. This approach is recognised in National Policy Statement for Energy EN-3, at paragraph 2.10.22, which states that the "capacity of the local grid network to accept

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				the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal", with paragraph 2.10.25 confirming that "applicants may choose a site based on nearby available grid export capacity".
Wiltshire Council	Site selection and alternatives	5.5. Annex A to the Site Selection Assessment Report presents a series of factors that have been considered through the assessment process. Under the title "Land Use", the assessment purports to have considered inter alia with extant planning permission for development and local plan / emerging local plan allocations. However, it is not clear whether the site selection process has assessed the electricity needs of these land uses and connection times.	No	Environmental Statement (ES) Volume 3 Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3] does not include an assessment of the electricity needs of extant planning permissions and allocations for development on the potential development areas. Instead, the focus of assessment was to seek to avoid areas already allocated for development, or where extant planning permission exists, so as not to conflict with those proposed land uses. As to grid capacity generally, the Scheme would not take capacity from other developments seeking to take electricity from the grid due to the distinction between the Transmission network and the Distribution network. The Scheme is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				connecting to the Transmission network, which carries electricity from all types of energy generation across the country, including nuclear and coal power stations, as well as large-scale renewable projects designated as NSIPs. This high-voltage network supplies power to regional Distribution Networks, managed by operators like SSE, who then distribute electricity for local needs. Therefore, the Scheme would add a renewable alternative to fossil fuels for energy generation in the UK, which ultimately delivers clean, green power to be used for existing developments and for developments coming forward as identified in local or emerging plans.
Wiltshire Council	Scheme description and DCO process / Landscape and visual	Chapter 2 (The Development Area): 7.6. The description of the development area included within Chapter 2 (The Development Area) outlines the maximum extents of the land required for the construction, operation maintenance and decommissioning phases of the scheme further illustrated by maps included in Volume 2, Figure 1-2 (Development Area)	No	Comment noted.

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		and Volume 2, Figure 2-1 (Elements of the Site). The council considers that the information is sufficient to inform the landscape and visual assessment of the scheme, noting that further refinement of Development Areas will follow as the detailed design is further refined and EIA progresses.		
Wiltshire Council	Scheme description and DCO process / Ecology and biodiversity / Soils and agriculture	6. The applicant is required to utilise horizontal directional drilling (HDD) under watercourses, woodland, hedgerows and any other habitats of importance lying along the cable connection route.	No	Details of how the cable route is proposed to be constructed are provided in Environmental Statement (ES) Volume 3, Appendix: 3-2 Cable Route Construction Method [EN010168/APP/6.3] . This document explains that start and end points of the different construction methods (being open trench and trenchless technologies) for the whole of the 22 km route will not be confirmed until the detailed design stage. Therefore, the approach taken for the Environmental Impact Assessment (EIA) is 1) to commit to 'Avoidance Areas' where the cable installation method will use trenchless technologies rather than open cut trenches; 2) assess a reasonable 'worst case scenario' that considers both the open

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				trench and Horizontal Directional Drilling (HDD) methods (refer to Sections 1.5 and 1.6). The locations of the Avoidance Areas are shown in ES Volume 2, Figure 3.2.6 to 3.2.10: Key Construction Phase Features [EN010168/APP/6.2] .
Wiltshire Council	Scheme description and DCO process / Cumulative Effects	Chapter 6 (EIA Methodology): 7.12. In paragraph 6.8.5 of Chapter 6 (EIA Methodology) it states that: "Volume 2, Figure 21-2 illustrates the location of other developments (cumulative developments) in the local area that have the potential to increase the impacts associated with the Scheme. An initial long list and the short list (Volume 3, Appendix 21-1) of cumulative developments has been prepared and shared with Wiltshire Council for consultation/agreement in preparing this PEIR. Chapter 21: Cumulative and InCombination Effects presents the list of relevant cumulative developments considered in the assessment." 7.13. Following the publication of the adopted scoping opinion by the Planning Inspectorate (PINS), Wiltshire Council was	Yes	Zone of Influence (Zol) extents for the assessment of potential cumulative effects are contained within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] . The approach to cumulative assessment and cumulative assessment in relation to landscape has been explained in Steering Group meetings with Wiltshire Council Officers. Furthermore, additional explanation has been provided to Wiltshire Council in relation to the zones of influences for landscape and visual, ecology, cultural heritage and the water environment.

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		subsequently consulted on the initial Long and Short Lists to be taken forward within the cumulative assessment of effects. One of the issues raised at the time was the absence of any justification informing the basis of specific 'Zone of Influence' (Zol) extents for individual topic areas included for assessment. At paragraph 6.8.12 it states that: "A review of other developments has been undertaken, initially encompassing a Zone of Influence (Zol) defined by the technical topic specialists in order to prepare a long list of 'other development' or 'cumulative developments'. The justification for each Zol identified is presented in Volume 2, Figure 21-2 and summarised in Chapter 21: Cumulative and In-Combination Effects." 7.14. The council notes that the justification for establishing the Landscape and Visual 'Zol' (noting these could be different for landscape and visual receptors) is not presented in Volume 2, Figure 21-2 as stated. Clarification was sought from the applicant on this specific point. The		The Potential Main Issues for Examination [EN010168/APP/7.24] identifies cumulative assessment and zones of influence as potential main issues for examination for Wiltshire Council.

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		clarification received to date was that Volume 1 - Chapter 6 reference to Vol 2, Fig 21-2 was an error, and technical justification informing ZOI for specific topic areas is provided in Vol 2, Fig 21-1 and further detail included at Vol 1, Chapter 21, para 21.5.7 (incorporating table 21-1).		
Wiltshire Council	Scheme description and DCO process / Consultation and Engagement	17. Island Green Power are asked to ensure that additional information, as identified within the council's statutory consultation response, is provided either before DCO submission or contained within its DCO application. Island Green Power should also seek to resolve the identified issues from the council's statutory consultation response during the ongoing scheme refinement and in advance of submission of the DCO application. It is strongly recommended by the council that the applicant undertakes a supplementary public consultation in advance of DCO submission to enable sufficient scrutiny of the cable connection route and its associated impacts. Therefore, the council must retain	Yes	The Preliminary Environmental Information Report (PEIR) provided a snapshot of the Applicant's assessment at that time, providing the information required for consultation bodies to develop an informed view of the likely significant environmental effects of the proposals. The Applicant considers the amount of information published during statutory consultation was sufficient and in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 , and that further statutory consultation is not required. The Applicant has engaged with Wiltshire Council outside of the non-statutory and statutory consultation throughout the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the ability to refine its position once the additional information required to fully assess the scheme is available. 21.2. Of particular concern is the lack of detailed assessment information in relation to the cable connection route. Island Green Power, the applicant, is recommended to undertake a further supplementary consultation in advance of the DCO application, so that consultees can consider the survey and further assessment information to ascertain whether the applicant's assessment of the full environmental effects of the scheme is robust. This would also enable the scheme to comply with the Environmental Impact Assessment Scoping Report, which indicated that the PEIR would provide details of a refined cable route.		development process and is committed to continue doing so. The Applicant has prepared an Issued Tracker and shared this with Wiltshire Council, in addition to liaising with Wiltshire Council to confirm the potential main issues for examination, which are set out in the Potential Main Issues for Examination [EN010168/APP/7.24]. In turn this will inform the Statement Common that the Applicant will prepare, with input from Wiltshire Council.
Wiltshire Council	Scheme description and DCO process /	4. National and Local Policy Considerations 4.1. Paragraph 165 of the National Planning Policy Framework (NPPF) requires local plans to help increase the use and supply	No	Comment noted.

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	Climate change and energy need	of renewable and low-carbon energy whilst ensuring that adverse impacts are addressed appropriately. The scheme is also aligned with the NPPFs requirement for the planning system to support the transition to a low carbon future, with recent revisions advising at NPPF paragraph 168(a): When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.		
Wiltshire Council	Scheme description and DCO process / Climate	4.3. In line with national legislation and guidance, Wiltshire Council has made a firm commitment to becoming a carbon neutral council by 2030. The Wiltshire Climate Strategy reiterates this commitment and expresses objectives that include	No	Comment noted.

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	change and energy need	renewable energy generation as part of the efficient and environmentally sensitive use of land, providing for the needs of an increasing population and nature.		
Wiltshire Council	Scheme description and DCO process / Socioeconomics, tourism, recreation and health	4.4. Policies CP1 and CP2 of the Wiltshire Core Strategy relate to the spatial strategy for Wiltshire, setting the policy foundations for the promotion of sustainable development within the county. The scheme is for a standalone renewable energy installation and will not directly impact existing housing or employment sites. The scheme will result in some employment provision in the form of construction jobs but does not relate explicitly to employment development.	No	Comment noted.
Wiltshire Council	Scheme description and DCO process / Climate change and energy need	4.5. Policy CP42 of the Wiltshire Core Strategy expresses that proposals for standalone renewable energy schemes will be supported where it has been demonstrated that impacts (both individual and cumulative) specific to following factors (relevant to this scheme) have been satisfactorily considered:	No	Individual and cumulative impacts have been considered within each technical chapter provided in Environmental Statement (ES) Volume 1, Chapters 7-20 [EN010168/APP/6.1] . A summary of all cumulative effects has been provided in ES Volume 1, Chapter 21: Cumulative and In-Combination Effects

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		(i) The landscape, particularly in and around Areas of Outstanding National Beauty (AONBs) (iv) Biodiversity (v) The historic environment [...] (vi) Use of the local transport network (vii) Residential amenity, including noise, odour, visual amenity and safety (viii) Best and most versatile agricultural land		[EN010168/APP/6.1]. Please refer to the following chapters: - ES Volume 1, Chapter 8: Landscape and Visual Amenity; - ES Volume 1, Chapter 9: Ecology and Biodiversity; - ES Volume 1, Chapter 13: Transport and Access; - ES Volume 1, Chapter 14: Noise and Vibration; and - ES Volume 1, Chapter: 17: Soils and Agriculture.
Wiltshire Council	Scheme description and DCO process (Planning) / Climate change and energy need	4.6. The cable connection search corridor passes through the Chippenham Neighbourhood Plan area. Policy SCC3 of the Chippenham Neighbourhood Plan reiterates the aims of CP42 expressing that proposals for standalone renewable energy development will be supported where all the following factors have been robustly demonstrated: a) the costs and benefits compare favourably with potentially less intrusive options, such as large scale building	No	Comment noted. The Statement of Need [EN010168/APP/7.1] explains that large-scale building mounted renewable energy is not an alternative to ground-mount solar, therefore both are required to meet the UK's climate goals. Please refer to Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual Amenity which is where the landscape impact assessment is contained. This includes the identification of mitigation

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		mounted renewable energy b) a comprehensive landscape impact assessment has been undertaken which has informed the proposals for the location of new infrastructure and all mitigation measures identified in that are implemented c) the wider benefits of providing energy from renewable sources, including contributions to national carbon reduction objectives and targets, outweigh any adverse impacts on the local environment or amenity, including any cumulative adverse impacts from existing or planned renewable energy developments; and d) additional social, economic or environmental benefits which benefit the local community over the lifetime of the project are provided. 4.7. Policy SCC3 further expresses that any proposal for community energy project, where there is full or partial community ownership involvement, will be strongly supported.		measures, including embedded mitigation which has been incorporated into the Scheme design. In terms of the wider benefits of providing energy from renewable sources this is outlined in the Statement of Need [EN010168/APP/7.1] and in ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]. The cumulative assessment (which includes an assessment of planned renewable energy developments) is contained within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. Existing renewable energy developments are considered as part of the baseline and therefore are assessed within ES Volume 1, Chapters 7-20 [EN010168/APP/6.1]. Details of additional social, economic benefits which benefit the local community are contained within the Outline Skills,

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				Supply Chain and Employment Plan [EN010168/APP/7.20] and ES Volume 1, Chapter 16: Socio-economic, Tourism and Recreation [EN010168/APP/6.1].
Wiltshire Council	Scheme description and DCO process (Planning) / Climate change and energy need	4.8. In summary, the principle of proposals for renewable energy development receives broad support from local planning policies CP42 to the Wiltshire Core Strategy and policy SCC3 to the Chippenham Neighbourhood Plan, as well as supporting Wiltshire's Green and Blue Infrastructure and climate strategies, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects. As set out in this response, further information is required from the applicant before the council can make an objective balanced planning judgement on the merits of the proposed scheme and therefore adequately assess its compliance with the aforementioned key policies.	No	Comment noted. The Applicant acknowledges the local policy requirement to mitigate adverse effects of the development, and has sought to avoid and mitigate adverse environmental effects through the iterative design process. The Scheme is designated as 'critical national priority' (CNP) infrastructure by National Policy Statement for Energy EN-1 , and therefore the overarching need case for this energy infrastructure must be given substantial weight by the decision maker when assessing the application. Paragraph 4.2.15 of NPS EN-1 confirms that, the mitigation hierarchy having been applied to the design of the proposals and identification of mitigation measures, the residual impacts of a project "are unlikely to outweigh the urgent need for this type of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				infrastructure” and that it is unlikely that consent will be reviewed in any but “the most exceptional circumstances”.
Wiltshire Council	Scheme description and DCO process / Climate change and energy need	5.8. It is noted that whilst the proposed scheme will predominantly ‘feed’ the transmission part of the grid (i.e. 500MW exports), it will nonetheless require power (i.e. 250MW imports) from the grid too. 5.9. It is not clear in the submitted PEIR material whether the Melksham Substation has sufficient connection capacity to serve all ‘committed’ development and the proposed scheme, or whether it needs significant reinforcement. 5.10. These factors do not appear to have been assessed in detail and therefore if this proposed scheme obtains development consent, there would appear to be a risk that it may stymie the delivery of planned growth i.e. as set out in the emerging Local Plan review and / or sites benefitting from planning permission. It is the council’s expectation that this is considered further in the ES.	No	By connecting to the National Electricity Transmission System, the Scheme will not impact on the ability to deliver Local Plan growth as local consumption connections are made to local Distribution Networks. Connecting more low-carbon generation to the National Electricity Transmission System will help to ensure that the electricity consumed by new (and existing) homes and businesses is low-carbon, i.e. consistent with the UK’s legal requirement to achieve Net Zero by 2050. Once operational, the scheme will only import from the grid when there is excess generation on the grid, this would always be subordinate to national consumption needs, and/or in support of the smooth operation of the national electricity system and ‘keeping the lights on’. The Applicant has secured a grid connection at Melksham to support the

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				connection and operation of the proposed scheme, this confirms that the necessary network capacity is available for the Scheme. Please refer to the Grid Connection Statement [EN010168/APP/7.5] for further information.
Wiltshire Council	Scheme description and DCO process / Climate change and energy need	Consultation Documents: 6.4. Based on the information contained in Chapter 7 (Climate Change) of the PEIR, the council acknowledges the applicant's comments, identified areas of further work and conclusions in general terms. It is noted that reference has been had to recognised industry sources and good practice, for example, the Institute of Environmental Management and Assessment (IEMA). It is considered that the level of assumptions Consultation Documents: and qualifications made within the PEIR seem reasonable given the current stage of the project, and the steps identified to refine this work when producing the ES.	No	Comment noted. The full assessment is contained in Environmental Statement (ES) Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] .

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Wiltshire Council	Scheme description and DCO process / Climate change and energy need	6.5. It is noted that the PEIR has taken the approach of dealing with climate change adaptation as a theme to run through other sections of the report. This is considered to be a reasonable approach, as such matters when viewed purely through a climate adaptation perspective are unlikely to be significant in Environmental Impact Assessment (EIA) terms.	No	Comment noted. The full assessment is contained in Environmental Statement (ES) Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] .
Wiltshire Council	Scheme description and DCO process	Wiltshire Council statutory consultation response to the Lime Down Solar Park proposals Please find attached the response of Wiltshire Council to the stage two statutory consultation by Island Green Power as to the aforementioned proposals. The response comprises a technical response document, along with a statement of the Council's Cabinet which raises additional points which the developer is asked to take account of.	No	Comment noted.

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		I trust that the attached is taken into consideration when preparing the proposals and in Island Green Power's future submissions to The Planning Inspectorate		
Wiltshire Council	Scheme description and DCO process	Wiltshire Council Cabinet Statement in Response to Lime Down Solar Park Consultation 19 March 2025 Wiltshire Council's Cabinet has reviewed and approved a statement in relation to the Lime Down Solar Park consultation which sits alongside the technical response setting out council officer's professional judgements on the application. This statement below sets out key additional points which Cabinet wish to highlight in objection to the application:	No	Comment noted.
Wiltshire Council	Scheme description and DCO process	16. It is recommended that since the council does not yet have sufficient information to understand the full likely local impacts of the development, it is not possible to fully determine the impact at this time.	No	Comment noted. The Applicant notes that the preliminary environmental information shared for the purposes of statutory consultation is that which is reasonably required for consultation bodies to develop an informed view of the likely significant effects of the proposed development. The

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				Environmental Statement (ES)[EN010168/APP/6.1] provided as part of the Development Consent Order (DCO) Application provides a full assessment of the Scheme.
Wiltshire Council	Scheme description and DCO process	18. Finally, it is requested that Island Green Power note that Wiltshire Council's Cabinet considers the scheme to represent unsustainable development. As is explained in this statement, the proposal would not achieve any of the overarching economic, social and environmental objectives set out in the NPPF.	No	Comment noted. The Scheme is designated as 'critical national priority' (CNP) infrastructure by National Policy Statement for Energy EN-1 , and therefore the overarching need case for this energy infrastructure must be given substantial weight by the decision maker when assessing the application. Paragraph 4.2.15 of NPS EN-1 confirms that, the mitigation hierarchy having been applied to the design of the proposals and identification of mitigation measures, the residual impacts of a project "are unlikely to outweigh the urgent need for this type of infrastructure" and that it is unlikely that consent will be reviewed in any but "the most exceptional circumstances".
Wiltshire Council	Scheme description	Introduction and Context Island Green Power (IGP) are conducting the pre-application statutory consultation on	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	and DCO process	the Lime Down Solar Park scheme between 29 January and 19 March 2025. Various documents have been published for consideration and comment from consultees, including: • A Project Information Booklet • The Preliminary Environmental Information Report Non-Technical Summary • The Preliminary Environmental Information Report (PEIR), which contains 22 chapters, various figures and technical appendices • Maps and plans of the proposed scheme. Wiltshire Council has prepared this response to the statutory consultation in its role as Host Authority for the scheme, and as the Local Planning Authority, Local Highways Authority and Lead Local Flood Authority. The council has reviewed the above published information, and its observations, identified opportunities and concerns have been highlighted in this response. The council's response should		

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		be considered by the applicant in its entirety, due to the inter-relationship between the various sections of the report and associated technical disciplines.		
Wiltshire Council	Scheme description and DCO process	3. The Scheme 3.1. As the Lime Down Solar Park scheme is anticipated to generate in excess of 50 Megawatt (MW) of electricity, it has been designated as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008. This NSIP is being promoted by Island Green Power (IGP), the applicant, under the requirements of the Planning Act to secure a Development Consent Order (DCO) to enable work to begin. 3.2. The applicant describes its proposals as "Lime Down Solar Park is a new utility-scale solar park and battery energy storage project proposed to be built on land in North Wiltshire. The project would comprise the installation of solar photovoltaic (PV) panels and an on-site battery energy storage facility, plus associated development to connect the project into the national grid at	No	Comment noted. The Applicant is Lime Down Solar Park Limited, which is part of the Island Green Power group.

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		Melksham Substation.” 3.3. At present, the scheme proposal covers approximately 2,834 hectares (ha) of land for solar photovoltaic (PV) energy generation, battery storage, associated infrastructure, and landscaping, heritage, surface water and biodiversity mitigation areas. The scheme would have up to a 500 MW export connection, 250 MW import connection and 500 MWh battery storage. The scheme is anticipated to be operational for a period of 60 years and be decommissioned from 2089		
Wiltshire Council	Scheme description and DCO process	3.4. The Project Information Booklet describes the core components of the scheme as follows: • Solar PV panels • Solar PV mounting structures • Supporting infrastructure – inverters, transformers and switchgear • Battery Energy Storage System (BESS) • Energy substations, including control buildings with welfare facilities • On-site cabling between the PV panels, BESS, inverters and transformers	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		• Grid connection cabling between the on-site substation and Melksham Substation • Temporary construction compounds and temporary roadway accesses • Accesses to the site for construction and operation • Site security measures, including fencing and CCTV systems around site perimeter • New planting, landscaping and biodiversity measures. 3.5. It is important to note that the scheme proposals are still developing, and that further environmental assessment and scheme development will occur in advance of the production of the Environmental Statement (ES), which will accompany the DCO application		
Wiltshire Council	Scheme description and DCO process	3.6. The applicant is proposing to prepare a suite of management documents to limit and control construction, operational and decommissioning activities associated with the scheme, which will seek to avoid or reduce impacts on the environment and local	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		communities. These outline plans would accompany the DCO application and include, but are not limited to, the following: • Construction Environmental Management Plan (CEMP) • Construction Traffic Management Plan (CTMP) • Construction Work Travel Plan (CWTP) • Public Right of Way Management Plan (PRoWMP) • Battery Safety Management Plan (BSMP) • Pollution Prevention Plan • Emergency Response Plan • Landscape and Ecological Management Plan (LEMP) • Arboricultural Method Statement • Soil Management Plan (SMP) • Written Schemes of Investigation (WSI) for heritage matters • Site Waste Management Plan (SWMP) • Skills, Supply Chain and Employment Plan (SSCEP) • Operational Environmental Management Plan (OEMP) • Decommissioning Strategy (DS)		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		- Decommissioning Environmental Management Plan (DEMP) - Decommissioning Traffic Management Plan (DTMP) 3.7. It is the applicant's stated intention that these documents would be further developed into detailed management plans prior to construction commencing and that the detailed management plans would be subject to continual monitoring and review throughout the construction phase. The development of these detailed management plans would be secured through a Requirement within the DCO. 3.8. It is currently expected that the applicant would submit the DCO application in early autumn 2025		
Wiltshire Council	Scheme description and DCO process	5.6. The emerging Local Plan review has been submitted for examination. It is accepted that the draft policies and proposals carry little weight in decision making, at the current time, but they nonetheless clearly set out the council's strategy for managing growth over the period to 2038 and	No	Given they may be considered important and relevant by the Secretary of State, the Applicant has provided an assessment of the Scheme with the Wiltshire Core Strategy (2015), and the Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19), set out in Annex B Local

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		potentially beyond. 5.7. The emerging Local Plan review identifies a significant level of housing and employment land commitments around Chippenham and Melksham. To provide direction and certainty in terms of where and when development will come forward to meet identified needs, the ability for such development to attain connections to the grid and electricity supply will be a fundamental requirement.		Policy Accordance Tables of the Planning Statement [EN010168/APP/7.2]. The Applicant held a meeting with Wiltshire Council to explain that the Scheme would not impact upon the ability of future development to connect to the grid, given these developments would connect to the distribution network whereas the Scheme will connect to the transmission network.
Wiltshire Council	Scheme description and DCO process	6.10. Whilst the steps suggested by the applicant should ensure additional accuracy in their ES, it is the council's view, based on the information provided from the applicant, that the impact of the development is likely to be beneficial in EIA terms relating to climate matters. 6.11. From a climate perspective, Wiltshire Council is satisfied that the PEIR has been compiled by the applicant, provides coverage consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 14(2) and	No	Comment noted.

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		allows officers to develop an informed view of the likely significant environmental effects of the development (and any associated development).		
Wiltshire Council	Scheme description and DCO process	7.4. An Indicative Masterplan (Volume 2, Figures 8.15.1 to 8.15.5) has been developed for the purpose of the PEIR, which sets out the proposed Solar PV Panel, BESS and substation areas together with the proposed environmental mitigation that has been developed including native tree and ground cover planting areas, hedgerow planting and reinforcement areas, habitat connections, field margin enhancement areas, green corridors, watercourse and woodland offset areas, and panel exclusion areas.	No	Comment noted.
Wiltshire Council	Scheme description and DCO process	Consultation Documents: Chapter 1 (Introduction): 7.5. Paragraph 1.6.13 of Chapter 1 (Introduction) identifies documents that collectively form the Development Plan. The currently listed documents in Chapter 1 do not identify the 'North Wiltshire Local	No	Noted. North Wiltshire Local Plan 2011 has been referenced in Environmental Statement (ES) Volume 1 Chapter 1: Introduction [EN010168/APP/6.1] .

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		Plan 2011', which remains relevant in part, as it contains some saved policies which still contribute to and comprise the Development Plan i.e. Core Policies NE12 and NE14 to the Wiltshire Core Strategy. It is therefore recommended that this reference is added, and relevant saved policies evaluated under relevant chapters. It is noted that reference and details of these relevant saved policies are included in Chapter 8.		
Wiltshire Council	Scheme description and DCO process	7.7. Volume 2, Figures 2-2-1 to 2-2-5 inclusive are maps that illustrate the existing individual field parcels comprising the separate development areas for Lime Down sites A to E. It is noted that there is a drawing reference number error on Figure 2-2-5, which erroneously states Figure 2-2-6.	No	Comment noted. The error has been corrected within the Environmental Statement (ES) [EN010168/APP/6.1].
Wiltshire Council	Scheme description and DCO process	7.8. Volume 2, Figures 2-3-1 to 2-3-5 inclusive are maps that illustrate the environmental and planning constraints within and surrounding Lime Down sites A to E. While Figures 2-3-6 to 2-3-9 inclusive illustrate the environmental and planning	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		constraints for the cable route search corridor.		
Wiltshire Council	Scheme description and DCO process	7.9. Volume 2, Figures 2-4-1 to 2-4-5 inclusive are maps that illustrate the public rights of way and highway network for Lime Down sites A to E. While Figures 2-4-6 to 2-4-9 inclusive illustrate the environmental and planning constraints for the cable route search corridor.	No	Comment noted.
Wiltshire Council	Scheme description and DCO process	21. Procedural Issues and Next Steps 21.1. As a NSIP, this scheme will be dealt with under the DCO process. The role of the council within this process is therefore as a statutory consultee. The council has considered its position on a number of aspects as set out in this statutory consultation response. Unfortunately, the council has insufficient information to reach a position on this scheme at the current time. Further information will be required in order for the council to make an objective balanced planning judgement in relation to the outputs of the assessments necessary to address the identified matters as set out in this consultation response.	No	Comment noted. The Preliminary Environmental Information Report (PEIR) was a snapshot of the Applicant's assessment at the time statutory consultation was carried out. It provided the information required for consultation bodies to develop an informed view of the likely significant environmental effects of the proposals. The Applicant considers the amount of information published during statutory consultation was sufficient and in accordance with this standard for preliminary environmental information. The Environmental Statement (ES) [EN010168/APP/6.1] provided as part of the Development Consent Order (DCO)

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				Application provides a full assessment of the Scheme
Wiltshire Council	Scheme description and DCO process	21.3. The council welcomes the applicant's intention to submit a number of management plans with its DCO application. It is the council's expectation that these documents would be prepared by the applicant in conjunction with council officers and other statutory organisations, with draft copies available for review and agreement prior to application submission. However, clarity is required on the intended consultation and approval processes for these proposed management plans. It is noted that the consultation documents indicate that some documents would be agreed with or approved by Wiltshire Council, but it is not clear whether this is intended to apply to all management plans proposed.	No	A review of the approach and content of the management plans has been undertaken on a case by case basis depending on the discipline. Ongoing consultation between Wiltshire Council Officers and the relevant technical leads has allowed those officers interested in reviewing the management plan content to engage with the plans prior to the Development Consent Order (DCO) submission. Schedule 2 of the draft DCO [EN010168/APP/3.1] secures each of the management plans and confirms where Wiltshire Council will be responsible for approval of detailed plans.
Wiltshire Council	Scheme description and DCO process	21.4. Clarity is also required on the extent of the proposed DCO order to be sought by the applicant. It is queried whether the DCO will be a "one-stop shop" application, whereby certain legislation is intended to be	No	The draft Development Consent Order (DCO) [EN010168/APP/3.1] provides a suite of powers to support the implementation of the Scheme. It is acknowledged that a small number of other

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		disapplied or whether certain consents, which normally fall within the remit of the Local Planning Authority or Lead Local Flood Authority, will remain. For example, Traffic Regulation Orders pertaining to PROW and local highways changes and Land Drainage Consents relating to ordinary water courses. It is the council's expectation that the council would have early sight of the draft DCO and the opportunity to input into it, in advance of the DCO application submission.		consents will be required to support delivery of the Scheme, and these are set out in the Consents and Agreements Position Statement [EN010168/APP/7.7] . The Applicant shared a working draft of the front end DCO and Schedule 1 (the authorised development) and Schedule 2 (requirements) with Wiltshire Council for comment prior to submission of the DCO application.
Wiltshire Council	Scheme description and DCO process	21.5. Furthermore, it is noted that the consultation documents indicate that the works at the National Grid substation in Melksham would be under National Grid control. Clarity is required on whether these works will be secured within the DCO order or whether separate consenting arrangements will be required. Clarification should also be provided on whether an environmental assessment of the proposed works at the Melksham substation would be included within the Environmental Statement (ES) to be submitted at DCO	No	Works at the Existing National Grid Substation in Melksham are included in the Development Consent Order (DCO) application. As stated in Environmental Statement (ES) Volume1, Chapter 3: The Scheme [EN010168/APP/6.1] works at the Existing National Grid Melksham Substation involve the addition of new electrical infrastructure and associated civil works to comprise a new 400 kV feeder bay to connect the Grid Connection Cables for the Scheme. The works are defined under Work No.4 in Schedule 1 of the Draft DCO

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		application and whether these works would be managed through the CEMP and OEMP.		[EN010168/APP/3.1]. Further information is contained within the Grid Connection Statement [EN010168/APP/7.5]. The works have been assessed within ES Volume 1, Chapters 7-20 [EN010168/APP/6.1] and will be managed through the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP). An Outline CEMP is provided within [EN010168/APP/7.12]. An Outline OEMP is provided within [EN010168/APP/7.13]. Both documents will be developed into detailed versions post-consent.
Wiltshire Council	Scheme description and DCO process	21.6. The council welcomes the opportunity to review the draft Commitments Register as part of the consultation material. However, it is the council's expectation that this Register will become further refined, with more prescriptive measures included, as the scheme becomes more defined. The council acknowledges the applicant's need to retain a level of in-built flexibility in the scheme, but it is the council's expectation	No	Environmental Statement (ES) Volume 5, Commitments Register [EN010168/APP/6.5] sets out mitigation measures that would be implemented as part of the Scheme. The Design Principles and Parameters [EN010168/APP/7.4] document provides the principles and maximum parameters for the detailed design of the Scheme. This

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		that the draft DCO will contain clear parameters for the scheme in the form of defined limits of deviation.		document is one that will be certified under the Draft Development Consent Order (DCO) [EN010168/APP/3.1] and development in accordance with the principles and parameters is secured by a Requirement.
Wiltshire Council	Scheme description and DCO process	21.7. It has been noted that a number of the references contained within the consultation documents are incorrect. For example, in Chapter 6 paragraph 6.8.12 it references "Volume 2, Figure 21-2" and in various paragraphs in Chapter 14 it references "Volume 3, Appendix 14-4". The above referenced documents have not been published as part of the consultation material. Going forward, and when considering the volume of material likely to be associated with this scheme at the DCO application stage, the applicant is requested to ensure that all references are correct to aid in the review and interrogation of the submitted material by all interested parties.	No	Comment noted. Any incorrect document references have been corrected throughout the Environmental Statement (ES) [EN010168/APP/6.1].
Wiltshire Council	Scheme description	21.8. Wiltshire Council will continue to work with Island Green Power on the Lime Down Solar Park scheme in its role as Host	No	Comment noted. The Applicant welcomes the feedback from Wiltshire Council and has considered these suggestions when

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	and DCO process	Authority, and one of the key statutory consultees. 21.9. For clarity, the council has summarised the information and activities required to be undertaken in advance of the DCO application from its perspective and those requirements which it believes should be included within the DCO documentation in Appendices 1A and 1B respectively. These are not intended to be an exhaustive list as additional requirements may be identified once the detailed designs for the scheme are more advanced. 21.10. The consultation response feedback form asks consultees to suggest community benefit initiatives that could be undertaken both on-site and off-site through a community benefit fund. The council's suggestions for potential community benefit initiatives to be delivered by the scheme are set out in Appendix 1C. 21.11. Wiltshire Council asks that Island Green Power takes these comments into full consideration.		drafting the Requirements included within the Development Consent Order (DCO) [EN010168/APP/3.1] and the management plans secured in those Requirements.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Scheme description and DCO process	Appendix 1A Information / Activities Required in Advance of DCO Application 1. Within its consultation response, the council has summarised the information and activities required to be undertaken in advance of the DCO application in order for it to be able to fully assess the scheme proposals and their associated impacts. For ease, these have been replicated in the paragraphs below. 2. This is not intended to be an exhaustive list and further information, assessment and documentation may be identified as required once the scheme proposals are further developed.	No	Comment noted.
Wiltshire Council	Scheme description and DCO process	Detailed Scheme Design Proposals: 3. It is acknowledged that the detailed scheme design is still evolving and will be influenced by consultation responses and assessment and survey data. However, Wiltshire Council requires clarity on the following aspects of the scheme proposals: a) The exact cable connection route, including any mitigation measures required.	No	Comment noted. All aspects have been provided in support of the Development Consent Order (DCO) application. Details of the Cable Route Corridor (as refined for DCO application submission) can be found in Environmental Statement (ES) Volume 1 Chapter 2: The Order Limits [EN010168/APP/6.1]. More

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		b) The exact details of the temporary construction compounds and associated staff car parking, including their location, size and construction methodology.		information regarding selection of the cable route corridor is contained within ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. The impacts of the construction of the Cable Route Corridor has been fully assessed within the Environmental Statement (ES) [EN010168/APP/6.1], any likely significant effects of the Scheme have been identified and appropriate mitigation measures incorporated into the Scheme. Mitigation measures are contained within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] to limit disruption during construction and/or decommissioning. In terms of parking for construction workers, as stated in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] car parking would be provided within the Order Limits. These measures are secured in the Outline

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				Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22].
Wiltshire Council	Scheme description and DCO process	m) The exact details of any works proposed at the National Grid substation in Melksham, including an assessment of the environmental impacts and any mitigation. This should include the consenting route and how these works are to be managed.	No	A description of the works required at the Existing Melksham National Grid Substation has been provided in Environmental Statement (ES) Volume 1 Chapter 3: The Scheme [EN010168/APP/6.1] .
Wiltshire Council	Scheme description and DCO process	k) Full environmental assessment of the cable routes / cable connection corridor.	No	Comment noted. The Environmental Statement (ES) [EN010168/APP/6.1] provides a full assessment of the Cable Route Corridor within each of the technical chapters.
Wiltshire Council	Scheme description and DCO process	Scheme Impacts: 6. Once the detailed design proposals for the scheme are known, further information will be required by the council in order to fully assess the associated impacts of the proposals. To assist the council with this, further information is required as follows: a) Refinement of the amount of electricity generating capacity to be achieved by the scheme. b) A detailed Landscape and Ecological	No	The Applicant confirms that assessment of potential impacts arising from the Scheme is set out in the Environmental Statement (ES) [EN010168/APP/6.1–6.3] submitted with the Development Consent Order (DCO) application. To ensure that impacts are appropriately managed, the Applicant has prepared a suite of outline management and mitigation documents submitted with the DCO

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		Management Plan (LEMP). c) A detailed Decommissioning and Land Restoration Plan. d) Detailed and robust assessment of the likely effects of the scheme, including the cable connection route and the solar PV sites, for ecology and biodiversity matters and in relation to all habitat types and species / species groups (please note this should also be provided for all other technical disciplines). e) Detailed assessment of the potential noise and vibration effects from scheme components and associated hardware on ecological receptors/ species. f) Detailed assessment of the potential effects to ecological receptors / species resulting from maintenance (cleaning) of the solar PV hardware. g) Detailed assessment of the potential effects caused by lighting during the construction, operation and decommissioning phases on ecological receptors / species. h) A full arboricultural impact assessment,		application, including, but not limited to, the following: • Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] • Outline Construction Environmental Management Plan (CEMP)[EN010168/APP/7.12] • Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] • Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] • Outline Archaeological Mitigation Strategy [EN010168/APP/6.3]. Detailed versions of these documents will be prepared post-consent following detailed design and will be submitted for approval by the relevant planning authority in accordance with DCO Requirements, ensuring that the issues raised (including

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		with associated tree constraints plans, tree protection plans and arboricultural method statement, which has been prepared in accordance with BS5837:2012 for both the construction and decommissioning phases. i) A detailed test regime to confirm which sites would or would not require soil remediation post construction. This should include details of intermediate remediation during construction to ensure that there is not an increase in flood risk resulting from soil compaction. j) Confirmation that for 1 in 1 / 1 in 2-year events, runoff is restricted to 70% of existing greenfield rates for the same storm event. k) The temporary drainage strategy for the scheme which demonstrates that local flood risk will not be temporarily increased. l) Applicant to undertake consultation with the EA on the foul strategy and provision of a septic tank. m) Detailed assessment to confirm that there will be no change to existing overland		ecology, arboriculture, noise and vibration, flood risk, cultural heritage, tourism and community considerations) are fully addressed at the appropriate stage.

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		flow routes to ensure that flood risk is not increased elsewhere. n) Detailed assessment with calculations to demonstrate that the full fire suppression flows can be accommodated within the proposed drainage without causing flooding of the site and / or elsewhere. o) A full cultural heritage impact assessment, which takes the findings of the significance and setting assessments into account. This should include impacts associated with the Highway Improvement Areas. p) A detailed archaeological mitigation strategy. q) A full noise impact assessment which covers the construction, operational and decommissioning stages of the scheme. r) A full noise and vibration assessment which covers the construction, operational and decommissioning stages of the scheme. s) A site-specific Construction Management Statement which covers dust suppression during construction works.		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		t) A full assessment of likely impacts on tourism arising from the scheme. u) The identification of a suitable set of Key Performance Indicators (KPIs) to measure the applicant's activities against. Of particular interest, would be the generation of KPIs associated with 'empowering communities' and measures to monitor compliance with the Construction Traffic Management Plan and Construction Work Travel Plan.		
Wiltshire Council	Scheme description and DCO process	Documentation to Accompany DCO Application: 8. A comprehensive suite of documentation is required to accompany the DCO application for this scheme. Wiltshire Council requests that this includes the following: a) Construction Environmental Management Plan (CEMP) b) Landscape and Ecological Management Plan (LEMP) c) Ecology Mitigation and Enhancement Plan (EMEP) d) Biodiversity Monitoring Strategy	No	The Applicant makes note of this comment. The majority of the stated documentation is available in Volume 7 of the Development Consent Order (DCO) [EN010168/APP/7.1 to 7.24]. Where documentation is located elsewhere or embedded within other Volume 7 documents this has been indicated below: c) Ecology Mitigation and Enhancement Plan (EMEP): This is covered in the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18].

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		e) Lighting Strategy f) Phasing Programme for Delivery of Mitigation, Compensation and Enhancement g) Habitats Regulation Assessment (HRA) h) Arboricultural Method Statement i) Construction Traffic Management Plan (CTMP) j) Construction Work Travel Plan (CWTP) k) Public Rights of Way Management Plan (PRoWMP) l) Operational Environmental Management Plan (OEMP) m) Site Waste Management Plan (SWMP) n) Decommissioning Strategy o) Decommissioning Environmental Management Plan (DEMP) p) Decommissioning and Land Restoration Plan q) Outline Battery Safety Management Plan (OBSMP) 9. These documents should be prepared by Island Green Power in conjunction with council officers and other statutory		d) A Biodiversity Monitoring Strategy is set out in Section 1.4 of the Outline LEMP [EN010168/APP/7.18] (referred to as an “outline ecological monitoring strategy”). e) Lighting Strategy: This is covered in Environmental Statement (ES) Volume 1 Chapter 3: The Scheme [EN010168/APP/6.1]. f) Phasing Programme for Delivery of Mitigation, Compensation and Enhancement: This is covered in the Outline LEMP [EN010168/APP/7.18], the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8], and the Commitments Register [EN010168/APP/6.5]. h) Arboricultural Method Statement: This is covered in ES Volume 3 Appendix 10-4: Arboricultural Method Statement [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		organisations, with draft copies available for review and agreement prior to submission		j) Construction Work Travel Plan (CWTP): This is covered in the Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22]. o) Decommissioning Environmental Management Plan: This is covered in the Outline Decommissioning Strategy (DS) [EN010168/APP/7.14]. p.) Decommissioning and Land Restoration Plan: This is covered in the Outline Decommissioning Strategy (DS) [EN010168/APP/7.14].
Wiltshire Council	Scheme description and DCO process	Appendix 1B Requirements for Inclusion in DCO Application 1. Wiltshire Council has identified a number of requirements, which it believes should be included within the DCO application, within its response to the statutory consultation. These are replicated within the paragraphs below for ease. 2. These are not intended to be an exhaustive list and further requirements	No	Comment noted. The draft Development Consent Order (DCO) [EN010168/APP/3.1] provides a suite of powers required for the implementation of the Scheme. The Requirements, including approval of a number of detailed management plans, are set out in Schedule 2 to the draft DCO [EN010168/APP/3.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		may be identified as the scheme proposals are further developed. 3. The detailed design for landscaping, including its specification, to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase. 4. An Ecology Mitigation and Enhancement Plan (EMEP) to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase. This should include a scaled drawing showing all existing ecological features, together with mitigation and enhancement measures in relation to the solar panel layout. It should also specify buffer distances, locations of new planting, sowing and other permanent features, whether retained or created. 5. A Phasing Programme for delivery of Mitigation, Compensation and Enhancement alongside the construction of the solar farm should be submitted to and agreed by the Local Planning Authority prior		

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		to the commencement of the construction phase. 6. The applicant is required to utilise horizontal directional drilling (HDD) under watercourses, woodland, hedgerows and any other habitats of importance lying along the cable connection route. 7. The location and specification for all scheme accesses and Highways Improvement Areas which affect the Local Highway Network are to be submitted to and agreed by the Local Highways Authority prior to the commencement of the construction phase. 8. The applicant must seek approval for all required permits, licenses and orders relating to works on or affecting the Local Highways Networks, including Public Rights of Way, from the Local Highways Authority in advance of works commencing.		
Wiltshire Council	Scheme description and DCO process	16. An Operational Environmental Management Plan (OEMP) is to be submitted to and agreed by the Local Planning Authority prior to the commencement of the operational phase of	No	An Outline Operational Environmental Management Plan (OEMP) has been prepared and is available in Volume 7 of the Development Consent Order (DCO) [EN010168/APP/7.13]. The DCO

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		this development which will contain sufficient mitigation measures to protect the environment during the operational phase. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.		Requirements secure the approval and implementation of a detailed OEMP, substantially in accordance with the outline OEMP [EN010168/APP/7.13] .
Wiltshire Council	Other environmental matters (Waste)	17. A Site Waste Management Plan (SWMP) is to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction, operation and decommissioning phases of the scheme which will identify the planned waste management action proposed for each different type, including on- or off-site reuse, on- or off-site recycling, or disposal. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.	No	An Outline Site Waste Management Plan (SWMP) has been prepared covering these aspects and is available in Volume 7 of the Development Consent Order (DCO) [EN010168/APP/7.16] . The DCO Requirements secure the approval and implementation of a detailed SWMP, substantially in accordance with the outline SWMP [EN010168/APP/7.16] .
Wiltshire Council	Other environmental matters (Minerals)	20. Minerals and Waste Considerations 20.1. The council has reviewed the information contained within the Chapter 20 (Other Environmental Matters) of the PEIR and its supporting appendices. 20.2. Wiltshire Council considers that the applicant has given appropriate	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		consideration to the topics of (i) Minerals and (ii) Minerals and Waste during this stage of scheme development.		
Wiltshire Council	Other environmental matters (Minerals)	20.3. The council concurs that the following mitigation measures should be secured as DCO requirements: 20.3.1. For topic (i) Minerals: - Decommissioning Strategy – to secure the removal of plant and structures at the end of the design life of the Scheme so as not to affect the long-term viability of working the identified sand and gravel resource. 20.3.2. For topic (ii) Minerals and Waste: - Construction Environmental Management Plan (CEMP) – to secure implementation of control measures and procedures for environmental impacts arising during construction. - Site Waste Management Plan (SWMP) – identifying the planned waste management action proposed for each different type, including on- or off-site reuse, on- or off-site recycling, or disposal. - Operational Environmental Management Plan (OEMP) – confirming the approach for	No	Comment noted. The Applicant confirms that these embedded mitigation measures have been included within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], the Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13], the Decommissioning Strategy (DS)[EN010168/APP/7.14], and Outline Site Waste Management Plan (SWMP) [EN010168/APP/7.16].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		material and waste management on-site, including component replacement during operation and maintenance. • Decommissioning Strategy – detailing the approach to be taken to maximise recycling and reuse of the scheme components at the end of their life. 20.4. Council officers will review the above-mentioned management plans once prepared to ensure that sufficient mitigation measures are proposed in relation to this scheme.		
Wiltshire Council	Other environmental matters (Glint and Glare) / Landscape and visual	n) The exact nature and location of screening mitigation associated with the solar photovoltaic panels, BESS and substations. o) Full and complete details of all security fencing to be erected. p) Final details of the physicality of the solar panels, as well as the location and external appearance of all supporting ancillary buildings as well as the BESS containers. Precise details of the mentioned fire mitigation measures and water supply in relation to the BESS should also be	No	Schedule 1 to the draft Development Consent Order (DCO) [EN010168/APP/3.1] sets out the Work Nos. for the infrastructure that constitutes the Scheme. These Work Nos. must be constructed within the corresponding areas shown on the Works Plan [EN010168/APP/2.3] Further detail as to the screening mitigation is provided in the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18], which is secured by a Requirement in the draft DCO

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		provided (as part of an Outline Battery Safety Management Plan).		[EN010168/APP/3.1]. The Requirements also provide for the detailed design of fencing to be approved, as well as secure that the design of the infrastructure complies with the Design Principles and Parameters [EN010168/APP/7.4]. Specific elements regarding the dimensions and physicality of the panels and BESS are discussed in Environmental Statement (ES) Chapter 3: The Scheme [EN010168/APP/6.1]. An Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21]. has been produced and is available as part of the DCO Application documents.
Wiltshire Council	Other environmental matters (Glint and Glare)	Light including Glare from Photovoltaic Panels: 15.17 The council notes that the applicant has not decided whether fixed south facing panels or single axis tracking panels will be used. 15.18 For fixed south facing panels, solar reflections are predicted to be experienced	No	Environmental Statement (ES) Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] presents an assessment of Glint and Glare from the Scheme on surrounding receptors (including rail, roads, residential properties, aerodromes, PRowS and the CNL). The assessment concludes that with the

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		for more than 3 months of the year, but for less than 60 minutes in any given day. No significant impact is predicted for the majority of receptors as existing vegetation, buildings and / or intervening terrain is predicted to significantly obstruct views of reflecting panels. 15.19 Five dwellings have been identified to have moderate impact from solar light reflection, and mitigation / gap filling is identified as being required. The council will require the applicant to provide it with further detail on the exact nature and location of this screening mitigation. 15.20 For single axis tracking panels, no significant impact is predicted, and no mitigation required.		implementation of mitigation measures such as use of 2.5m fixed panels where required no significant effects are predicted as a result of the Scheme. Both east-west single axis tracking Solar PV Panels (Option A) and south facing fixed Solar PV Panels (Option B) are included within the parameters that have been assessed for the Scheme, meaning both could be used. At this stage it is considered likely that Option A will be used within all Solar PV Sites, unless there are practical or environmental constraints at an individual field level that make it necessary to use Option B. Option A is preferred due to single axis trackers offering better energy output than fixed Solar PV Panels and because single axis trackers have the benefit of being lower in height for most of the day compared to fixed south facing Solar PV Panels. The options are discussed in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1].

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				The exact size and arrangement of transformers, switchgear and inverters would be determined at a detailed design stage, and a suitable area has been left for the flexibility of options. The maximum parameters (height, size and noise etc.) of the equipment will be used for the assessment. The options are discussed in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] .
Wiltshire Council	Other environmental matters (Battery Safety)	Informative on the Potential Environmental Impacts of Battery Energy Storage Systems (BESS) 15.21 There are risks associated with Battery Energy Storage Systems (BESS) concerning the potential for toxic chemicals to enter soil and ground water in the event of a fire. The EA should be consulted on this matter as they are responsible for the protection of groundwater. The EA are likely to require that the site is designed with drainage features, suitable for containing contaminated surface water run-off in the event of a fire.	No	The Applicant notes this comment, the Environment Agency have also been consulted on the drainage strategies presented in Environmental Statement (ES) Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessments and Drainage Strategies [EN010168/APP/6.3] . The Applicant has also consulted with Dorset Fire and Rescue whose recommendations have been fully captured within the Outline Battery Storage Safety Management Plan (BSMP) [EN010168/APP/7.21] , this includes use of the latest National Fire Chiefs guidance.

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		15.22 The council advise that the applicant develops and maintains a close working relationship with Dorset and Wiltshire Fire Service and develop a workable and comprehensive risk management plan and an emergency response plan as detailed in the National Fire Chiefs Council document "Grid Scale Battery Energy Storage System planning – Guidance for FRS" (see separate sub-section on fire safety). 15.23 At the present time, the council is not aware of any requirements for the applicant to apply for an Environmental Permitting Regulations Permit, and the activity associated with the scheme is not covered by Control of Major Accident Hazards Regulations 2015 (COMAH). These rules may, however, change during the life of the project.		
Wiltshire Council	Other environmental matters (Battery Safety)	16. Fire Safety of Battery Energy Storage System (BESS) Considerations 16.1. The consultation documents confirm the development will include BESS containers. The precise number of individual BESS containers is subject to	No	The Applicant notes that the BESS in field D18 has been removed from the Scheme since PEIR. The number of battery containers remains at approximately 270.

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		further development, but it is currently expected that the Scheme would include up to 270 BESS battery containers across either one or two locations (both of which are suggested as being located within Lime Down D in Field D1 and Field D18 as is shown in the below Indicative Site Layout taken from Chapter 3 (The Scheme) to the PEIR [see page 84 of Technical Response for figure]:		
Wiltshire Council	Other environmental matters (Battery Safety)	16.2. Chapter 20 (Other Environmental Matters) to the PEIR acknowledges that there may be some potential for fire(s) as a result of the BESS elements of the development. Although rare, fires and associated explosions have the potential to cause safety concerns to human health, including anyone working on site, or within the area of fire spread / associated contamination fall out. Fires also have the potential to have an impact on the natural environment including the habitats and species on site and surrounding area. For this reason, the PEIR confirms the need to assess the effects of such within the EIA.	No	The Applicant understands the importance of assessing the safety of the BESS, particularly with regards to potential BESS fires. Environmental Statement (ES) Volume 1, Chapter 15: Air Quality and Chapter 20: Other Environmental Matters [EN010168/APP/6.1] assess the likelihood of fire as a result of the BESS, possibility of unplanned emissions as a result of a fire on nearby receptors and the potential for a Major Accident to occur as a result of a BESS fire. These chapters conclude that with the implementation of embedded mitigation measures no significant effects are predicted from BESS

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				Fire. A notable embedded mitigation measure for both these chapters is the inclusion of the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] in the Development Consent Order (DCO) which has the following aims: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas; and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.
Wiltshire Council	Other environmental matters (Battery Safety)	16.3. The PEIR confirms that the battery technology proposed for the development will have built in safety features including fire resistant construction, fire detection, cooling and suppression systems, emergency stop functions and isolation monitoring, which are designed to regulate	No	The Applicant confirms that the battery technology has built in safety features to reduce the likelihood of a fire such as battery liquid cooling systems with automated fail-safe operation. These are detailed in Outline Battery Safety Management Plan (BSMP)

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		temperatures to within safe conditions to minimise the risk of fire. The PEIR also commits to an Outline Battery Safety Management Plan being prepared and submitted with the DCO submission. It is stated that this will be updated and maintained as a 'live document' throughout the operational phase of the scheme. The implementation of the strategy will be secured via a requirement to the DCO.		[EN010168/APP/7.21] which has been developed in consultation with Dorset and Wiltshire Fire and Rescue Department. The Outline BSMP [EN010168/APP/7.21] will be developed into a detailed BSMP and is secured by a Requirement in the draft Development Consent Order (DCO) [EN010168/APP/7.21] .
Wiltshire Council	Other environmental matters (Battery Safety)	16.4. During the construction and decommissioning phase, the PEIR confirms that health and safety on-site would be managed by the contractor to mitigate the risk of fire in accordance with relevant legislation and guidance. This is to be set out further within the Outline CEMP and Decommissioning Strategy to be submitted with the ES.	No	Comment noted. The Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline DS [EN010168/APP/7.9] confirm the requirement for compliance with health and safety measures.
Wiltshire Council	Other environmental matters (Battery Safety)	16.5. Wiltshire Council does not retain in-house expertise to comment on the adequacy of the approach to minimise and mitigate the risk and effect of fire, but as is advised by the Planning Practice Guidance (PPG) (Paragraph: 035 Reference ID: 5-	No	Comment noted. The Applicant has provided an Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] within the application documents. This document has been developed in consultation with Dorset

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		035-20230814), the applicant should undertake full consultation with the Dorset and Wiltshire Fire Service. It is noted that Chapter 20 to the PEIR confirms the applicant's intention to engage with the fire service so as to inform the evolving scheme. Provided the applicant proceeds as is stated, and in accordance with the National Fire Chiefs Council advice referenced in the PPG, there is no reason for the council to take issue with the approach proposed.		and Wiltshire Fire and Rescue Department. The Requirement for approval of the detailed BSMP requires consultation with the Wiltshire Fire and Rescue Service and the Environment Agency.
Wiltshire Council	Other environmental matters (Battery safety)	19. An Outline Battery Safety Management Plan (OBSMP) is referenced within the PEIR documents as being prepared and submitted with the DCO submission so as to clearly set out the mitigation measures to be put in place to prevent fire risk to the BESS. As is also referenced, this should be updated and maintained as a 'live document' throughout the operational phase of the scheme. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.	No	An Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] has been prepared and has been developed in consultation with Dorset and Wiltshire Fire and Rescue Department.

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Wiltshire Council	Noise and vibration / Air quality / Other Environmental matters	15. Public Protection Considerations 15.1 In preparing these comments, the council has considered the information contained within Chapter 14 (Noise and Vibration) and Chapter 15 (Air Quality) of the PEIR and the associated appendices. Appendix 20-4 of Chapter 20 (Other Environmental Matters) relating to the Solar Photovoltaic Glint and Glare Study has also been considered. This review has been undertaken with reference to the EIA Scoping Opinion, and comments previously provided by Wiltshire Council with regard to this.	No	This comment is noted by the Applicant.
Wiltshire Council	Noise and vibration	8. There is no assurance that resident's amenity would not be detrimentally impacted by the noise from the operation of the site. This is also a reason for refusal given the motorised nature of the large solar units.	No	The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the Environmental Statement (ES) [EN010168/APP/6.1]. This provides reassurance that significant effects from

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				noise will be avoided while also allowing some flexibility on how this is achieved. Additionally, as explained in Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], the tracking motors in the Solar PV Panels would be below the existing sound environment at properties and will therefore not be a disturbance to residential dwellings.
Wiltshire Council	Noise and vibration	Noise Associated with the Operation of the Scheme: 15.2 It is noted that the noise assessment is based on baseline and scheme design information available at the time of writing (January 2025). 44 noise sensitive receptors have been identified in Figure 14.2 of the noise assessment. Each receptor location is subject to a more detailed assessment of both operational and construction impacts, and the receptors have been selected to represent locations where noise / vibration impacts associated with the scheme are most likely. A recent	No	Further baseline noise surveys were undertaken between 27 March 2025 and 4 April 2025 at locations deemed representative of the nearest existing noise sensitive receptors along the proposed Cable Route Corridor. This is reported in Section 14.7 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and ES Volume 3, Appendix 14-3: Baseline Noise Survey [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		background noise survey was carried out by the applicant at 17 locations deemed representative of noise levels at the closest point of proposed receptors. However, background noise surveys have not been undertaken in the locality of the cable connection corridor and an undertaking to provide this data within the future Environmental Statement (ES) has been given by the applicant.		
Wiltshire Council	Noise and vibration	15.3 The applicant has used 3D high resolution noise modelling software to predict noise impacts associated with the operation of the solar farm at each of the 44 noise sensitive locations with parameters set to provide a reasonable worst-case scenario. All residential receptors been set to be downwind of noise sources with wind speeds set to 3 m/s. Receiver heights are 1.5 metres (ground floor living rooms) and + 4 metres (first floor bedrooms). However, it is not clear whether the noise results in table 2 of Appendix 14-3 are for ground floor or first floor level and the applicant will	No	Section 14.4 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] clarifies that receiver points have been reported as 1.5 m above local ground level (representative of ground-floor windows during the day), 4 m above local ground level (representative of first-floor bedroom windows during the night) and 6.5 m above ground level for certain receptors (representative of second-floor bedroom windows during the night). Modelling indicates that levels are virtually all within 1 dB between floors due to the horizontal

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		need to provide clarity on this. It is the council's expectation that data should be presented for both receiver / receptor heights. 15.4 Furthermore, octave-band source data is not known for the following noise sources: • Conversion units • Solar PV panels (tracking structures) • Substations (transformers) • Battery Energy Storage Systems (inverters) 15.5 Whilst the applicant has provided and modelled typical noise data for each of these components, they have undertaken to develop and refine the assessment "as additional information becomes available and presented within the ES". The applicant will need to provide an updated BS4142 assessment once the octave-band data for the above sources is known.		distances between sources and receivers. Octave and one-third octave band data for BESS, Inverters, Transformers and Conversion Units used in the noise modelling, and associated BS4142 assessment, are provided in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As explained in Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], the tracking motors in the Solar PV Panels would be well below the existing background sound environment at properties and therefore do not form part of the modelling exercise.
Wiltshire Council	Noise and vibration	15.6 It is noted that no noise contour map is provided. This makes it difficult to see noise propagation and the source / pathway / receptor relationship. The council requires a	No	Daytime and night-time noise contour maps, showing each noise source and the location of each receptor, are provided in Environmental Statement (ES) Volume 2,

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		noise map showing each noise source for the operational stage and the location of each receptor to be provided.		Figure 14-2: Daytime Operational Noise Contours [EN010168/APP/6.2] and ES Volume 2, Figure 14-3: Night-time Operational Noise Contours [EN010168/APP/6.2] respectively.
Wiltshire Council	Noise and vibration	15.7 Predicated noise levels at each receptor are provided in Appendix 14-3. However, these predictions are not broken down by source, meaning it is impossible to know the predicted contribution that each noise source makes to the noise level at each receptor. The council will therefore require a breakdown of each operational noise source (conversion units, solar PV panels (tracking structures), substations (transformers) and battery inverters) and a BS4142 rating calculation provided for each. Without this information, the council cannot comment on the accuracy of the noise predictions made in the report.	No	A breakdown of the sound power level of each operational noise source is provided in Environmental Statement (ES) Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3] . A BS4142 rating penalty is applied to reflect the distinctive sound of the equipment, as explained in Section 14.6 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] . A review of ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2] together with ES Volume 2, Figure 14-2: Daytime Operational Noise Contours [EN010168/APP/6.2] and ES Volume 2, Figure 14-3: Night-time Operational Noise Contours [EN010168/APP/6.2] , provides an indication of the dominant noise source at each receptor across the site.

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				The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1], commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES [EN010168/APP/6.1]. Therefore, a detailed source apportionment breakdown is not provided since this is potentially subject to change. The commitment provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved.
Wiltshire Council	Noise and vibration	15.8 The assessment predicts that “the assessment results presented within Table 2 of Volume 3, Appendix 14-4 demonstrates that noise levels from the Scheme are not predicted to exceed the existing background noise levels at the closest sensitive receptors during the daytime or night-time which would lead to a Moderate/Minor effect and not significant”.	No	Section 14.4 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] presents the assumption and limitations behind the noise modelling, including the assumed periods of operation of plant. In summary conversion units and the 132 kV Substations are assumed to be operational during the daytime only and everything else

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		It has not been possible to verify this statement as the council has been unable to locate Appendix 14-4. However, appendix 14-3 sets out noise assessments results and confirms that based on the design of the scheme, predicted operational noise levels will not exceed background levels at any residential receptor. Clarification is required from the applicant as to whether these predictions are based on any assumed mitigation inherent to the design of the scheme. It is noted that predictive calculations are based on all noise sources being fully operational during the day and night-time periods, when in reality, the level of noise is proportionate to the level of sunlight and therefore noise levels at night will be substantially lower than during the daytime. For example, for the conversion units, it is assumed that each unit will operate simultaneously at full capacity during the day and night-time to represent a worst-case scenario.		is assumed to operate continuously. A list of mitigation measures that were employed in the operational noise modelling are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with further detailed provided in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3].
Wiltshire Council	Noise and vibration	15.9 The applicant has advised that “as the design of the Scheme progresses, the use	No	This discrepancy is acknowledged. The Applicant can confirm that the mitigation

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		of other embedded mitigation measures such as enclosures, louvres and/or acoustic barriers around inverters and BESS cooling fans will be considered and set out within the ES". The statement implies that additional mitigation might be required, which seems contrary to the noise assessment's findings that there will not be any adverse noise impact on residential receptors. The applicant should explain the reasoning for the statement. Additionally, it is not clear at what stage the necessity for this mitigation will be decided.		presented in Section 14.9 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] is required to achieve the noise levels presented in Section 14.10 . However, instead of committing to this specific mitigation the applicant is committing to the resultant noise levels at properties, as outlined in the Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13] . This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved as technology improves. The Scheme will be remodelled at the detailed design stage to demonstrate that the final design can achieve the levels reported in the ES [EN010168/APP/6.1] .
Wiltshire Council	Noise and vibration	15.10 The noise assessment confirms that "further refinement" to the design and layout of the scheme is possible. It is imperative that noise impacts from operational, construction and decommissioning stages are reappraised once the details of the final	No	The noise and vibration assessment presented in Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] is based upon the Scheme as presented in ES Volume 1, Chapter 3: The Scheme

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		scheme are known and that this information is provided to the council at the earliest possible stage.		[EN010168/APP/6.1]. It is possible that there will be further refinements to the Scheme as it progresses through detailed design, as explained in the Rochdale Envelope subsection of Section 3.2 of ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]. With respect to noise and vibration, not only does ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] assess a reasonable worst-case but there are commitments in the draft Development Consent Order (DCO) [EN010168/APP/3.1] designed to control construction and operational noise and vibration in practice and with respect to the final design. For example, the Outline Construction Environmental Management Plan [CEMP] [EN010168/APP/7.12] commits to a noise monitoring programme to be agreed with Wiltshire Council, and the Outline Operational Environmental Management Plan [OEMP] [EN010168/APP/7.13]

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				commits to noise levels from the final Scheme at residential dwellings being the same as or below those modelled in the ES [EN010168/APP/6.1] .
Wiltshire Council	Noise and vibration	15.11 The consultation documents state that “modifications to the Existing National Grid Melksham Substation would be undertaken by National Grid and do not form part of the Scheme”. Whilst it is understood that the applicant may not be the legal person responsible for carrying out the modifications to the Melksham substation, these modifications are a direct consequence of the scheme and from a noise point of view are relevant to the DCO application for that reason. It is unclear whether the work to the National Grid substation will require planning permission or not. If it does not, the council is concerned that there could be noise impacts to enabling work associated with the scheme which are not controlled through the planning process via mitigation. As such, the council requires a BS4142 noise assessment for these works which	No	The works to connect the Scheme to the National Grid Substation at Melksham are included as Work No. 4 in the draft Development Consent Order (DCO) [EN010168/APP/3.1]. Section 14.10 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] considers the construction noise associated with modifications to the Existing National Grid Melksham Substation. The closest works could be from noise sensitive receptors is over 400 m and, as such, with reference to the construction noise assessment for the Solar PV Sites, noise from these works would not lead to significant effects.

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		sets out the predicted noise levels at residential receptors, including the detailing of any mitigation required in order to protect residential amenity.		
Wiltshire Council	Noise and vibration	Noise and Vibration associated with Construction Impacts: 15.12 The council notes that the ABC method of assessment as set out in BS5228-1 will be used to determine acceptable threshold values based on ambient level of noise at receptors as determined from the baseline survey for daytime. Mitigation is proposed which is based on "guidelines in BS 5228-1 and Best Practical Means (BPM) to minimize construction noise impacts as far as possible". The preliminary assessment has indicated that with an effective CEMP in place, noise and vibration impacts will not be significant for noise sensitive dwellings, however a full assessment is proposed for the ES. The council requires this assessment to follow the relevant methods of calculations as specified in section F of BS5228-1:2009+A1:2014. In addition, the	No	The construction noise assessment, presented in Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] , follows the principles of BS5228-1:2009+A1:2014, and noise monitoring throughout the construction period, to be agreed with Wiltshire Council, is committed to in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] .

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		council will require a validation sound monitoring during construction activities using one of the sampling methods specified in section G.2 of BS5228-1:2009+A1:2014 at noise sensitive dwellings to verify that the construction noise levels are acceptable and within limits.		
Wiltshire Council	Noise and vibration	15.13 It is noted that further noise surveys to establish baseline noise levels will be undertaken once the cable route corridor locations are defined and this assessment will be provided prior to the submission of the DCO application within the ES. The council expects the noise assessment to be revised once this level of detail is known and a review of the requirement for additional controls undertaken.	No	Section 14.10 of the Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] presents the results of the revised construction noise and vibration assessment accounting for the measured baseline sound levels along the Cable Route Corridor. This includes the consideration of appropriate mitigation measures, such as exclusion zones for Horizontal Directional Drilling (HDD) activity.
Wiltshire Council	Noise and vibration	l) The exact mitigation measures proposed to address identified noise and vibration impacts.	No	Section 14.9 of the Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] presents the mitigation measures incorporated in the noise and vibration

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				assessment to avoid significant adverse effects.
Wiltshire Council	Noise and vibration	n) BS4142 noise assessment, setting out all receiver / receptor heights and octaveband data for all sources. This must also include a breakdown of each operational noise source and BS4142 rating calculations for each. o) BS4142 noise assessment for works to be undertaken at the National Grid substation in Melksham. p) Full BS5228 noise and vibration assessment for construction impacts including all relevant calculations and a validation of sound monitoring during construction activities.	No	The assessment of operational noise has been undertaken with reference to BS4142:2014 as described in Section 14.6 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] clarifies that receiver points have been reported as 1.5m above local ground level (representative of ground-floor windows during the day), 4m above local ground level (representative of first-floor bedroom windows during the night) and 6.5m above ground level for certain receptors (representative of second-floor bedroom windows during the night). Modelling indicates that levels are virtually all within 1dB between floors due to the horizontal distances between sources and receivers. Octave and one-third octave band data for BESS, inverters, transformers and

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				conversion units used in the noise modelling, and associated BS4142 assessment, are provided in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As explained in Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], the tracking motors in the Solar PV Panels would be well below the existing background sound environment at properties and therefore do not form part of the modelling exercise. A breakdown of the sound power level of each operational noise source is provided in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A BS4142 rating penalty is applied to reflect the distinctive sound of the equipment, as explained in Section 14.6 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. A review of ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2] together with ES

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Volume 2, Figure 14-2: Daytime Operational Noise Contours [EN010168/APP/6.2] and ES Volume 2, Figure 14-3: Night-time Operational Noise Contours [EN010168/APP/6.2], provides an indication of the dominant noise source at each receptor across the site. The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13], which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1], commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES [EN010168/APP/6.1]. Therefore, a detailed source apportionment breakdown is not provided since this potentially subject to change. The commitment provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] considers the construction noise associated with modifications to the Existing National Grid Melksham Substation. The closest works could be from noise sensitive receptors is over 400m and, as such, with reference to the construction noise assessment for the Solar PV Sites, noise from these works would not lead to significant effects. The construction noise assessment, presented in ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], follows the principles of BS5228-1:2009+A1:2014, and noise monitoring throughout the construction period, to be agreed with Wiltshire Council, is committed to in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].
Wiltshire Council	Noise and vibration	q) A full noise impact assessment which covers the construction, operational and decommissioning stages of the scheme.	No	A full noise and vibration assessment which covers the construction, operational and decommissioning stages of the Scheme is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		r) A full noise and vibration assessment which covers the construction, operational and decommissioning stages of the scheme.		presented in Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and the associated figures and appendices.
Wiltshire Council	Landscape and visual / Ecology and biodiversity / Cultural Heritage / Hydrology, flood risk and drainage	15. Following assessment of the proposals, Wiltshire Council objects to the proposal based on significant concerns that have been raised about the potential demonstrable harm that the development will have upon matters such as landscape and visual impact, ecology and biodiversity, heritage and flooding. The extent to which these impacts can be mitigated is unclear at this stage. However, this is expected to be challenging given the scheme's significant scale (area, height etc.), the duration of the construction phase and the disruption to local residents. Whilst it is acknowledged that there are some environmental and economic benefits, based upon the information submitted, these are outweighed by the anticipated harm in this rural countryside setting.	No	The scale of development within the red line boundary has significantly reduced from the layout assessed at Preliminary Environmental Information Report (PEIR) as part of the iterative design process and response to consultation. Regarding landscape and visual impacts the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES

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				[EN010168/APP/6.1]. The outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Regarding concerns around flooding ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] confirms that no significant effects are predicted upon flood risk from the Scheme. The Applicant has refined the design of the Scheme and included mitigation so as to avoid, minimise and mitigate the adverse effects of the Scheme, and considers that the residual impacts are unlikely to outweigh the urgent need for renewable energy generation that is classed as 'critical national priority' infrastructure in National Policy Statement for Energy EN-1.

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Wiltshire Council	Landscape and visual / Ecology and biodiversity	7.40. It is acknowledged that some field areas initially proposed as solar panel infrastructure areas have been removed or reduced in extent from the scheme where these were assessed to result in potential for likely significant adverse visual effects for sensitive visual receptors. The removal of these areas following iterative landscape and visual assessment is welcomed in landscape and visual terms, noting that some other field areas are similarly removed to safeguard identified settings to heritage assets (such as opposite Fosse Lodge in Lime Down C) or to provide ecology mitigation / net gain areas or to avoid sensitive buried archaeology. These removed field areas, as based on current indicative layouts, are understood to remain within the project site area and will provide onsite mitigation or additional enhancement opportunities for ecology / Biodiversity Net Gain (BNG).	No	The majority of fields removed from the Scheme to avoid harm to landscape/visual receptors, especially on the edge of the Cotswold National Landscape (CNL) or where there is buried archaeology, remain within the Scheme and are proposed for onsite mitigation and/or positive enhancement areas for landscape, ecology / Biodiversity Net Gain (BNG).
Wiltshire Council	Landscape and visual /	The reinstatement of missing and lost hedgerow trees is considered an important enhancement opportunity to help conserve	Yes	Specific mitigation measures and enhancement plans are included in the Environmental Statement (ES)

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	Ecology and biodiversity	and enhance landscape character and leave a positive landscape legacy from the project. (The reintroduction of disease resistant varieties of hedgerow Elm trees into this landscape could be supported). • Restore missing and enhance the existing species and age diversity of hedgerow trees and field trees present in the landscape. It is acknowledged that many hedgerow trees have been lost from the landscape / field pattern over the last 50 years, primarily resulting from Dutch Elm Disease (1970's) and more recently and ongoing from Ash Die Back. English Oak comprises the highest percentage of the remaining hedgerow and field trees in this area of Wiltshire, and it can be observed that many of these trees are of a similar mature age. Oak trees are high water demand trees and could be at increased risk of drought stress with longer drier summers arising from climate change. Taking this into account, a successive approach to selection of trees to grow on as hedgerow trees or planting new trees could		[EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.12] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].

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		be adopted over the life of the project might be adopted. i.e. not all provided up front, with potentially a second phase after 30 years and another phase prior to decommissioning.		
Wiltshire Council	Landscape and visual / Ecology and biodiversity	• Reinstatement of historic hedge lines / former field patterns. • Improve and enhance existing hedgerow structure. Lay overgrown hedgerows and improve species diversity of woody hedgerow species, with supplementary planting to increase ecological value and nature recovery.	Yes	Specific mitigation measures and enhancement plans are included in the Environmental Statement (ES) [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.12] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].
Wiltshire Council	Landscape and visual / Ecology and biodiversity	b) A detailed Landscape and Ecological Management Plan (LEMP).	No	An Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.12] is included as part of the Development Consent Order (DCO) Application. A detailed LEMP, substantially in accordance with the Outline LEMP [EN010168/APP/7.12], is secured by the Requirements in the draft DCO [EN010168/APP/3.1].

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Wiltshire Council	Landscape and visual / Cumulative Effects	7.15. The council's Landscape Officer has been unable to find any justification within the submitted PEIR information to explain the justification for the ZoI for cumulative Landscape and Visual topic area, including within Volume 3 – Appendix 8-1 Landscape and Visual Impact Assessment (LVIA) Methodology, where it simply states at para, 2.5.1 that 'The Cumulative landscape and visual effects relating to the Cumulative Developments are considered as part of this LVIA cumulative assessment. Cumulative Effects relating to other similar developments (Cumulative Developments) are considered within the Cumulative Developments assessment.' Further detail or explanation should be provided in relation to the Landscape and Visual assessment methodology used in the assessment of 'cumulative schemes' and 'cumulative developments' alongside justification for establishing the Landscape and Visual cumulative development ZoI (this is discussed in further detail under comments for Chapter 21 (Cumulative and	No	The Methodology for the Cumulative Landscape Assessment, provided in Environmental Statement (ES) Volume 3 Appendix 8.1: Landscape and Visual Impact Assessment Methodology [EN010168/APP/6.3], provides a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. Additional mapping has been included in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the proposed Lime Down Sites and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas.

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		In-Combination Effects)). It is considered that the applicant should provide this additional information, if it exists, signpost it more clearly.		
Wiltshire Council	Landscape and visual / Cumulative Effects	7.16. In the council's Landscape Officer's opinion, the methodology and basis of the current cumulative landscape and visual assessment is not clear. At this preliminary stage, the submitted information doesn't appear to consider within its scope the most relevant type of cumulative effect associated with the introduction of large-scale solar development and associated infrastructure over existing farmland, providing a rural separating function and setting to Wiltshire's characteristic limestone villages, and which provides countryside recreation and amenity functions for their associated communities.	No	The applicant notes this comment.
Wiltshire Council	Landscape and visual / Cumulative Effects	7.17. Paragraph 7.17 of the third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) explains there are many different types of cumulative landscape and visual effects that may need to be considered and lists seven different	No	The Landscape and Visual Impact Assessment (LVIA) Methodology in Environmental Statement (ES) Volume 3 Appendix 8.1 [EN010168/APP/6.3] defines the difference between the assessment of Cumulative Sites (Site's A-E and the cable

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		types of cumulative effect that could be relevant to include. In the council's Landscape Officer's opinion, the two most relevant of these seven bullet points to include from the guidelines are (underline added for emphasis): • The filling of an area with either the same or different types of development over time, such that it may be judged to have substantially altered the landscape resource and views or visual amenity. • Incremental change as a result of successive individual developments such that the combined landscape and / or visual effect is significant even though the individual effects may not be; 7.18. Paragraph 7.18 of the GLVIA3 states that: "Agreement should also be reached about whether the cumulative effects assessment is to focus primarily on the additional effects of the main project under consideration, or on the combined effects of all the past, present and future proposals together with the new project." 7.19. It is considered that due to the large		corridor- The Scheme) and Cumulative Developments (other similar solar projects) at Section 2.3.4 and 2.3.5 respectively. The Cumulative Assessment has assessed the Scheme effects in combination with the Cumulative Developments and existing solar schemes (identified in the baseline).

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		expanses of land that these types of development occupy, and the obvious magnitude of change to landcover and land use, there is a proportionate justification in this regard to follow the 'combined' effects approach, as it is felt that stakeholders, including the public will likely be more interested to understand the combined effects of all the past, current and future proposals, including the proposed scheme.		
Wiltshire Council	Landscape and visual	3. The site abuts the Cotswolds National Landscape and views out from the landscape would be impacted. As such, the scale and cumulative impact of the site are relevant not just to local residents but also in relation to the protected landscape	Yes	The Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 LVIA on Special Qualities of the Cotswold National Landscape (CNL) includes an assessment of the impact of the Scheme on the CNL and the Special Qualities. The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate in order to reduce

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				development impacts and control any negative effects on the environment. Parcels within the setting of the CNL, on the boundary of the CNL have been removed from the scheme. Paragraph 189 of the NPPF is considered in the ES [EN010168/APP/6.1] has directed the design with the removal of all fields on the boundary of the CNL or within its immediate setting. The Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The CNL is fully assessed as its own standalone receptor in ES Volume 3, Appendix 8.6: LVIA on the Special

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				Qualities of the CNL. It assesses the impacts of the proposal upon landscape character, visual amenity and the CNL's special qualities and addresses how the scheme seeks to further the purpose of the National Landscape's designation. Fields C2, C3 and C4 have been removed from the scheme entirely to avoid significant adverse landscape and visual effects on the CNL and its setting. Panels within C1, C6, C8, the western section of C9, and the majority of C10 have been removed and the land used for ecological mitigation to protect the setting of the CNL. Panels within fields A11 and A12 have been removed and the land used for ecological mitigation to protect the setting of the CNL towards Sherston. All fields on the edge of the CNL provide habitat enhancement to further the purpose of the CNL designation and have been informed by the CNL Management Plan and the CNL (AONB) Landscape Strategy and Guidelines'

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Wiltshire Council	Landscape and visual	4. As it stands, not possible to come to a proper view on the proposals, since no crosssections, photomontages etc. Have been provided to show how the panels themselves will be seen from different viewpoints.	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. ES Volume 2 Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2] includes summer and winter viewpoint photography and (LI TGN 06/19 compliant) Type 4 AVR Level 3 Photomontages.
Wiltshire Council	Landscape and visual	9. Further to residents' amenity, the applicant accepts that there is no way to completely screen the solar site especially given its scale and the elevation of land on which it is based. Given the height of the solar panels, such screening would require the planning of fast growing, non-native trees to provide any screening which would itself be inappropriate in the setting of North	No	The Applicant accepts there are places within the Scheme where panels are difficult to screen due to the topography. In addition to the removal of panels in C2, C3 and C4 further panel removal has taken place in in Site C and along the Fosse Way for this reason. No non-native trees are proposed within the Scheme.

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		Wiltshire. The inability to screen the site will result in substantial amenity harm and is a reason for refusal.		Whilst the Applicant recognises that screening will take time to become established, National Policy Statement EN-1 recognises that renewable energy NSIPs will have some residual effects, given their scale and urgent need.
Wiltshire Council	Landscape and visual	Response Context: 7.1. This response primarily considers the information included within Chapter 8 (Landscape and Visual) of the PEIR. Comments are also provided on other chapters and information where landscape and visual matters are relevant. 7.2. It is noted that this statutory consultation phase remains within the pre-application stage of the DCO process. The following comments and observations are provided primarily to check whether the methodology and approach to the assessment of Landscape and Visual effects upon appropriately identified receptors is sufficient or sufficiently on course to enable informed planning judgement on the likely	No	Comment noted.

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		resulting significant landscape and visual effects arising from the project, including any significant cumulative landscape and visual effects that are considered likely to arise from the development proposals in combination with other existing and planned developments.		
Wiltshire Council	Landscape and visual	7.10. The council's Landscape Officer does not identify any obvious landscape or visual receptor omissions pertinent to the consideration of landscape and visual assessment, or issues with how this information is presented on the supporting maps.	No	Comment noted.
Wiltshire Council	Landscape and visual	7.11. It is anticipated that additional maps will be incorporated into the Landscape and Visual chapter of the finally submitted ES, following the refinement of the detailed cable connection route in accordance with the identified design parameters for this project element.	No	Mapping of the refined cable corridor is provided in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] has included an assessment of landscape and visual effects

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				on receptors within the refined 500m corridor.
Wiltshire Council	Landscape and visual	Chapter 8 (Landscape and Visual): 7.20. Chapter 8 (Landscape and Visual) presents the findings of the Environmental Impact Assessment (EIA) undertaken to date considering the landscape and visual impacts of the proposed scheme during the construction, operation (including maintenance) and decommissioning phases. The following aspects are identified to have been considered within the Landscape and Visual Impact Assessment (LVIA) process to inform the findings of this chapter to date (Jan 2025): • The existing landscape and visual baseline scenario within a defined Study Area, and the nature of change. • The effects upon landscape and visual receptors arising as a result of the Scheme and the significance associated with identified effects based on the sensitivity of these receptors to change and the magnitude of any change that will likely	No	Comment noted.

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		occur. It also defines whether an effect is beneficial, adverse, or neutral. • Embedded mitigation proposals established in response to design proposals to date and identified landscape and visual receptors.		
Wiltshire Council	Landscape and visual	7.21. The methodology states that it follows the advice contained within the 'Guidelines for Landscape and Visual Impact Assessment – Third Edition' (GLVIA3) and supporting LITGN-2024-01-GLVIA3 'Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment – Third Edition (GLVIA3). The council agrees that this referenced guidance alongside the other guidance listed under paragraph 1.11 of Volume 3, Appendix 8 is the appropriate guidance to establish the methodology relating to the assessment of likely significant landscape and visual effects including cumulative landscape and visual effects.	No	Comment noted.
Wiltshire Council	Landscape and visual	7.22. The following observations are provided in relation to the LVIA	No	The comment is noted and agreed with. This text in para 1.4.11 has been moved to

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		methodology as currently included at Appendix 8-1 (Volume 3) of the PEIR. 7.23. Under the section heading 'Visual Baseline', paragraph 1.4.11 states: "Landscape character types (LCTs) are reviewed during fieldwork and the descriptions contained in the published landscape character assessment are augmented where necessary." The council considers that the extracted text relates to the landscape baseline methodology and not the visual baseline methodology.		the section on landscape baseline. Refer to Environmental Statement (ES) volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1]
Wiltshire Council	Landscape and visual	7.24. There is no information included within the LVIA methodology which justifies or explains how the ZoI for the cumulative landscape and visual assessment has been established. Further comments in relation to the LVIA's specific approach and methodology employed for the assessment of cumulative Landscape effects and cumulative Visual effects is included under comments for Chapter 6 (EIA Methodology) and Chapter 21 (Cumulative and In-Combination Assessment of Effects).	Yes	The Cumulative Assessment within the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any potential cumulative effects on identified receptors. ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment

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				Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the Scheme Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. ES Volume 1 Chapter 21: Cumulative and in-combination effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.
Wiltshire Council	Landscape and visual	Landscape Effects: 7.25. Following a preliminary review of the summary tables for likely landscape effects, as included within Appendix 8-3-1 (Volume 3) Landscape Assessment, it is noted that Table 1.1 [See page 17 of Technical	No	Comment noted.

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		Response PDF for Tabel 1.1] provides a summary of the landscape receptors assessed as part of the PEIR (extracted below) for potential significant effects to arise from the project. 7.26. The above table brings together the assessed cumulative site effects (Lime Down A to E) into a summary overview of the significance of landscape effects which are assessed at this stage for each of the receptors assessed for individual solar panel areas, which are included as separate tables for each area within Appendix 8-3-1.		
Wiltshire Council	Landscape and visual	7.27. The applicant has assessed that the only likely significant effects considered to arise from the introduction of the totality of the scheme at this location are for the Landscape Fabric receptor, i.e. relating to cumulative consideration of landscape elements / components, for example trees, hedgerows, woodland, ponds etc. The assessment concludes that at Operation (year 15) there would be a moderate significant beneficial effect, following the establishment of mitigation and	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], concludes that there would be Moderate Beneficial Effects (Significant) to Landscape Fabric at Year

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		enhancement planting, and a moderate significant adverse effect upon the character of the Local Study Area (1km) at Construction phase and for Year 1 Operation phase, which progressively reduces to moderate minor adverse and not significant by Operation (year 15). No other significant adverse effects are otherwise anticipated for landscape receptors by the applicant. The council is not yet in a position to agree with this conclusion.		15 and Decommissioning and Moderate Adverse Effects (Significant) to Landscape Character within the Local Study Area. Detailed breakdowns are included within Landscape Assessment Sheets provided in ES Volume 3 Appendices 8-3-1 and 8-3-2 [EN010168/APP/6.3] .
Wiltshire Council	Landscape and visual	7.28. At this stage, and without the benefit of the detailed LVIA on the final scheme, the council's Landscape Officer is not yet in a position to agree that if appropriate new planting successfully establishes, and as it begins to mature, then the project (Lime Down areas A to E) could result in a moderate beneficial effect at year 15 Operation and Decommissioning phases of the project for the landscape fabric. This would very much depend on the final design of the scheme and its successful establishment and appropriate future management.	No	The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] , ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Landscape and visual	7.29. The only other significant effect identified by the applicant in Chapter 8 is for the landscape character of the Local Study Area. The council has considered the supporting landscape assessment sheets of the PEIR, which in the council's Landscape Officer's opinion seem to rely upon the embedded mitigation design parameters in all cases, including buffers and standoffs to sensitive visual receptors alongside new mitigating planting to screen development areas and improve visual integration of the solar panel areas in order to reduce this moderate significant adverse effect assessed at year 1 Operation, to a moderate / minor adverse (not significant) effect at Year 15 Operation for the baseline character of the Local Study Area including all site areas (Lime Down A to E).	No	Comment noted.
Wiltshire Council	Landscape and visual	7.30. It is the council's Landscape Officer's opinion that the applicant's preliminary consideration of likely resulting significant effects arising from the development proposal has only superficially evidenced the consideration of the resulting change	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		effects upon the existing landscape character baseline. The significance of resulting effect upon the Local Study Area (landscape character) is a measure of resulting change arising from the introduction of the development proposal into the existing landscape baseline situation, in this case, the Local Study Area equates to the character of the site areas (Lime Down A to E) and their immediate adjoining landscape context.		Mitigation measures have been incorporated into the Scheme to reduce adverse effects. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. Mitigation measures have been informed by the Management Guidelines contained within the Landscape Character Assessment relevant to the Site; Wiltshire's Nature Recovery Strategy; Cotswolds National Landscape Nature Recovery Plan; and the Statements of Environmental Opportunities for the Cotswold and Avon

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				Vale National Character Areas. All embedded mitigation measures would provide reinforcement to the host landscape fabric of the Site, strengthening and reinforcing existing landscape elements, in accordance with LCA aims and guidelines and Wiltshire's Nature Recovery Strategy and the Cotswolds National Landscape Nature Recovery Plan.
Wiltshire Council	Landscape and visual	7.31. The provisional assessment of likely significant effects upon landscape character doesn't appear to consider or reference the scale (land area cover) of the development proposal or corresponding land use change, or how the introduction of new urbanising solar scheme elements including 100's of hectares of solar panel strings, 2 substations and up to 2 Battery Energy Storage System (BESS) facilities into the receiving local landscape (character) baseline alter this. The provisional assessment of landscape character seems to focus on retention and enhancement of physical perimeter site landscaping	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Mitigation measures have been incorporated into the Scheme to reduce adverse effects. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement

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		components (landscape fabric which is assessed separately), while in other areas of the PEIR, it states that additional enhancement measures are not relevant to the assessment of overall significance.		which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] concludes that there would be Moderate Beneficial Effects (Significant) to Landscape Fabric at Year 15 and Decommissioning and Moderate Adverse Effects (Significant) to Landscape Character within the Local Study Area. Detailed breakdowns are included within Landscape Assessment Sheets provided in ES Volume 3 Appendices 8-3-1 and 8-3-2 [EN010168/APP/6.3].
Wiltshire Council	Landscape and visual	7.32. The magnitude of change to character seems to acknowledge the qualitative elements of the landscape, but not the quantitative change from new introductions, or how these fit with the existing character	No	Comment noted.

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		to maintain the baseline condition. The character of the existing landscape baseline will be substantially changed from that of existing farmed fields and seasonal farming activities functioning to providing greenfield separating countryside between distinctive rural limestone villages and farmsteads to extremely large, albeit disaggregated areas of new urbanising solar energy infrastructure. These effects are in theory fully reversible, but will be of long-term duration. They will endure for the proposed life of development and visual mitigation measures, combined with landscape enhancement planting would not in the council's Landscape Officer's opinion substantially alter this state of significance from Operational Year 1 to Operational Year 15 in terms of character.		
Wiltshire Council	Landscape and visual	Visual Effects: 7.33. It is noted that the initial assessment of visual receptors is evidenced by numerous visual assessment sheets included within Appendix 8, including assessments of Private receptors at	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environment Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Appendix 3-2-1; Transport receptors at Appendix 3-2-2 and public receptors at Appendix 3-2-3. Those visual receptors assessed likely to experience significant visual effects are scoped in to be taken forward for final visual assessment and inclusion within the ES to be submitted with the DCO application. The council's Landscape Officer does not identify any additional public visual receptors or raise any issues in this regard.		
Wiltshire Council	Landscape and visual	7.34. The proposed public viewpoint locations to be taken forward for visual assessment are included within Chapter 8 and listed at Table 8-7 (Proposed Viewpoint Locations), which is supported by Figures 8-10 (viewpoint location maps) and Figures 8-10-1 to 8-10-5 (viewpoint location maps of individual site areas A to E) and Figures 8-14-1 to 8-14-57 (Viewpoint Baseline Photography and Accurate Visual Representation (AVR) Level 1 photomontages) in Volume 3 of the PEIR.	No	Comment noted.

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Wiltshire Council	Landscape and visual	7.35. The viewpoint locations have been subject to consultation and agreement with the council's Landscape Officer and the Cotswolds National Landscape (CNL). Additional viewpoints have been requested by Wiltshire Council and CNL representatives during consultation on this matter, and the PEIR confirms these have been or will be additionally included. Therefore, the council's Landscape Officer does not identify any additional visual receptors or viewpoints (including longer distance) which would be necessary to additionally include to provide a proportionate assessment of likely significant visual effects arising from the proposed development.	No	Viewpoint locations are shown in Environmental Statement (ES) Volume 2 Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2] , which includes summer and winter viewpoint photography and (LI TGN 06/19 compliant) Type 4 AVR Level 3 Photomontages.
Wiltshire Council	Landscape and visual	7.36. A series of AVR Level 1 photomontages have been produced to show the effects of the scheme at locations where significant visual effects are considered likely to occur. The locations of the photomontages have been agreed with the Cotswolds National Landscape Board (CNLB) and Wiltshire	No	Viewpoint locations are shown in Environmental Statement (ES) Volume 2 Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2] , which includes summer and winter viewpoint photography and (LI TGN 06/19 compliant) Type 4 AVR Level 3 Photomontages.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Council's Landscape Officer. It is understood that the summer Viewpoint photography for the additionally requested photomontage viewpoint locations requested by the CNLB and Wiltshire Council could not be undertaken in time for inclusion in this report. However, it is understood that both winter and summer photography will be included in the final ES.		
Wiltshire Council	Landscape and visual	7.37. The council welcomes that the final ES submission will include AVR Level 3 photomontages (which include details such as materials, textures and colour) in both winter and summer months from a number of these Viewpoints, which will be finally agreed with CNLB and Wiltshire Council alongside cumulative photography where the effects of the Scheme would be seen in combination with other Development . 7.38. Therefore, the council's Landscape Officer does not raise any specific issues in relation to the visual assessment methodology as currently outlined within Chapter 8 of the PEIR at this stage. It should enable the preparation of a	No	Viewpoint locations are shown in Environmental Statement (ES) Volume 2 Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2] , which includes summer and winter viewpoint photography and (LI TGN 06/19 compliant) Type 4 AVR Level 3 Photomontages.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		proportionate and transparent visual assessment as part of the LVIA to be carried out for the final DCO scheme.		
Wiltshire Council	Landscape and visual	Embedded Mitigation Measures: 7.39. The PEIR identifies embedded mitigation measures as a design response to date, seeking to avoid, reduce, and compensate for significant adverse landscape and visual effects resulting from the proposed development.	No	Comment noted.
Wiltshire Council	Landscape and visual	7.41. It is the council's Landscape Officer's view that some additional field areas, currently illustrated as panel areas within site layout drawings, should be removed to provide further embedded mitigation for the final scheme. Obvious examples are considered to be the land located in the northwest corner of Lime Down C due to the rising sloping and open nature of the topography viewed by receptors located within the CNL, and which could be considered as complimentary landscape to the CNL designation, and rising field(s) to the north of Lime Down E, which are visible from the edges of Corston and which	Yes	It is recognised that Site A, B and C or parts thereof are within the setting of the Cotswold National Landscape (CNL). Consultation with the CNL Board has led to the removal of panels in Sites A, B and C to avoid harm to the CNL. These fields will remain in the Scheme and will be used to provide positive enhancement.

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		shares some potential for a cumulative visual effect with the existing operational Rodbourne Rail Solar farm from elevated vantage points.		
Wiltshire Council	Landscape and visual	Additional Enhancement Measures: 7.42. It is understood that the applicant has requested feedback in relation to the nature and type of landscape enhancement measures suitable for the project to seek to deliver. The council has identified the following measures as a starting point for further project team / stakeholder engagement: • In areas that are considered to comprise the setting to the CNL, or adjacent areas that can be considered as 'complimentary' landscapes to the CNL, mitigation measures and enhancements should support the delivery of policies contained within the 'Cotswolds National Landscape (AONB) Management Plan' which can be further detailed and informed on a landscape character area basis by following advice contained within the 'Cotswolds National Landscape (AONB) Landscape	Yes	It is recognised that Site A, B and C or parts thereof are within the setting of the Cotswold National Landscape (CNL). Consultation with the CNL Board has led to the removal of panels in Sites A, B and C to avoid harm to the CNL. These fields will remain in the Scheme and will be used to provide positive enhancement.

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		Strategy and Guidelines' and other relevant guidance.		
Wiltshire Council	Landscape and visual	Enhancement planting and future management objectives in all areas should be generally aligned to support the delivery of the 'Wiltshire and Swindon Nature Recovery Strategy' (this is currently of draft status, but likely to be adopted prior to DCO submission), Wiltshire Green and Blue Infrastructure Strategy, and supportive of landscape management recommendations for specific landscape character types and areas identified within the hierarchy of published Landscape Character Assessments as identified within the scoping opinion, including environmental opportunities identified within the National Character Area Profiles.	Yes	Mitigation measures have been informed by the Management Guidelines contained within the Landscape Character Assessment relevant to the Site; Wiltshire's Nature Recovery Strategy; Cotswolds National Landscape Nature Recovery Plan; and the Statements of Environmental Opportunities for the Cotswold and Avon Vale National Character Areas. All embedded mitigation measures would provide reinforcement to the host landscape fabric of the Site, strengthening and reinforcing existing landscape elements, in accordance with LCA aims and guidelines and Wiltshire's Nature Recovery Strategy and the Cotswolds National Landscape Nature Recovery Plan.
Wiltshire Council	Landscape and visual	The construction of new, maintenance and repair of existing dry-stone walls. (Note: avoid new hedgerow planting adjacent to existing drystone walls).	Yes	One section of dry stone wall exists within the Site, this is located on the eastern boundary of Field A1. The Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18]

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				provides details of the proposed mitigation and enhancement which are described in Section 9 of Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] , ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] , this includes retention of the existing dry stone wall and repair where necessary.
Wiltshire Council	Landscape and visual	• Replacement of existing stiles with access for all gates along the rural public rights of way network. • Introduction of permissive or dedicated paths through or linking site areas to offer alternative attractive recreational routes, or create new circular recreational routes or linking connections, where this is compatible with ecology / biodiversity objectives.	Yes	The Applicant confirms that direct consultation has been held with the Public Rights of Way Team at Wiltshire Council to determine how the Scheme can improve PRoW network connectivity. Resultantly, the Applicant has committed to incorporate any PRoW access furniture needs as part of the detailed design phase. Any access furniture required within the Order Limits as part of the Scheme will be installed and maintained as set out in the Outline PRoW Management Plan (PRoWMP) [EN010168/APP/7.17] which is

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				secured by requirement in the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. The Applicant furthermore commits to a series of permissive paths within the Solar PV Sites as part of the Scheme, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on Environmental Statement (ES) Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. Any additional requests for improvements to PRoW access arrangements, or permissive routes outside the Order Limits can be explored through the Community Benefit Fund in coordination with the Wiltshire Council and relevant landowners.
Wiltshire Council	Landscape and visual	7.53. Having visited the locations of the Lime Down Areas A-E scheme to ground truth a number of representative visual receptors and representative viewpoints used within the visual assessment, both independently and accompanied with the applicant's appointed landscape consultant,	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Refer to ES Volume 3: Appendix 8.3 LVIA

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		it is the council's Landscape Officer's opinion that there is likely limited potential for substantial levels of shared intervisibility between the separate Lime Down (A to E) site areas from representative viewpoints. However, this requires further work.		Assessment Sheets [EN010168/APP/6.3] for specific assessment of intervisibility of individual sites.
Wiltshire Council	Landscape and visual	7.55. The approach to assessment of cumulative landscape effects in relation to landscape character (in particular the 'Limestone Lowland Type' and its associated 'Landscape Character Areas') are not in the council's Landscape Officer's opinion being appropriately considered but need to be.	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The Cumulative Assessment within the LVIA is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment is provided in ES Volume 3 Appendix 8-9 LVIA Assessment Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				effects on the Landscape Character Areas within the defined Study Areas. Additional mapping has been included in the LVIA to show existing solar schemes, the proposed LD Sites and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. ES Volume 1 Chapter 21: Cumulative and in-combination effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.
Wiltshire Council	Landscape and visual	7.56. There is an evident spatial clustering of existing, proposed and planned large-scale solar PV development and BESS feeding into Minety, Chippenham and Melksham substations in this area of Wiltshire, and in particular within this character type. This is incrementally and progressively significant changing the landscape character baseline due to the magnitude of change effects associated	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The Cumulative Assessment within the LVIA is based on the 10km Cumulative Study area for the Scheme. This is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		with this type of development which should be factored into susceptibility judgements for this additional NSIP project in the same character type and area.		considered suitable to identify any potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment is provided in ES Volume 3 Appendix 8-9 LVIA Assessment Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. A Technical Note has also been issued to Wiltshire County Council. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the Scheme Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. The existing solar developments within the Cumulative Study Area for part of the existing baseline against which the scheme has been assessed. The Cumulative Assessment considers the impact of the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Scheme in combination with these existing schemes as well as other schemes that are within Planning, but not yet built. ES Volume 1 Chapter 21 Cumulative and in-combination effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.
Wiltshire Council	Landscape and visual	7.57. The cumulative landscape assessment should illustrate graphically the application boundary extents of all existing large scale operational solar farms and BESS, those in receipt of planning consent pending construction, and those currently in planning awaiting determination within a clearly reasoned and justified ZOI for this purpose to help understand the extent of their coverage on the baseline Landscape Character Type and Area(s).	Yes	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The Cumulative Assessment within the LVIA is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment is provided in ES Volume 3 Appendix 8-9 LVIA

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Assessment Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. A Technical Note has also been issued to Wiltshire County Council. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the Scheme Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. The existing solar developments within the Cumulative Study Area for part of the existing baseline against which the scheme has been assessed. The Cumulative Assessment considers the impact of the Scheme in combination with these existing schemes as well as other schemes that are within Planning, but not yet built.

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				ES Volume 1 Chapter 21 Cumulative and in-combination effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.
Wiltshire Council	Landscape and visual	DCO Conditions / Requirements: 7.58. At this initial stage, the council requests that the following heads of terms of DCO requirements are included for council approval: 1. Provision of detailed landscaping proposals 2. Implementation of landscaping proposals (including replacement of planting failures during early years establishment 3. Maintenance of landscaping (for duration of project) 4. Tree protection plans and arboricultural method statements for both construction and decommissioning phases 5. Landscape and Ecological Management Plan (LEMP) 6. Decommissioning and Land Restoration Plan	No	1. Provision of detailed landscaping proposals: The Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement. 2. Implementation of landscaping proposals (including replacement of planting failures during early years establishment: The Outline LEMP [EN010168/APP/7.18] provides details of Implementation of landscaping proposals. 3. Maintenance of landscaping (for duration of project): The Outline LEMP [EN010168/APP/7.18] provides an outline of details on maintenance of landscaping for duration of project.

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				4. Tree protection plans and arboricultural method statements for both construction and decommissioning phases: An Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] has been included within the application. 5. Landscape and Ecological Management Plan (LEMP): An Outline LEMP [EN010168/APP/7.18] has been included within the application. 6. Decommissioning and Land Restoration Plan: An Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] has been included with the application.
Wiltshire Council	Landscape and visual	c) The exact detailed landscaping proposals, including all embedded mitigation and enhancement measures.	No	This has been set out within Environmental Statement (ES) Volume 1 Chapter 8: Landscape and Visual [EN010168/APP/6.1], Figure 8-15: Indicative Masterplans [EN010168/APP/6.2] and the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Landscape and visual	b) Completion of a detailed Landscape and Visual Impact Assessment (LVIA) in respect of the final scheme. The LVIA should of course take account of committed development of relevant types and, most particularly, the cumulative impacts of existing and permitted solar PV development. c) Production of Level 3 AVR photomontages for both winter and summer months from all relevant viewpoints for agreement with the CNLB and Wiltshire Council.	No	The applicant notes this comment. This has been set out within Environmental Statement (ES) Volume 1 Chapter 8: Landscape and Visual [EN010168/APP/6.1].
Wiltshire Council	Landscape and visual	3. The detailed design for landscaping, including its specification, to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase.	No	The detailed Landscape and Ecological Management Plan (LEMP), substantially in accordance with the Outline LEMP [EN010168/APP/7.18], must be approved by the relevant planning authority in accordance with the Requirements in the Draft Development Consent Order (DCO) [EN010168/APP/3.1].
Wiltshire Council	Landscape and visual	Management Plans: 9. A Landscape and Ecological Management Plan (LEMP) is to be submitted to and agreed by the Local	No	An Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] has been prepared and submitted with the Development

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Planning Authority prior to the commencement of the construction phase. This will include obligations on the applicant for the implementation of landscaping proposals (including the replacement of planting failures during early years establishment) and maintenance of landscaping for the duration of the scheme. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.		Consent Order (DCO) Application. The detailed LEMP, substantially in accordance with the Outline LEMP [EN010168/APP/7.18] , must be approved by the relevant planning authority in accordance with the Requirements in the Draft DCO [EN010168/APP/3.1] .
Wiltshire Council	Landscape and visual	7.3. It is acknowledged that the survey, assessment and preliminary design of solar panel areas A to E are further advanced at this stage of the NSIP project in comparison to the cable route linking the separate panel areas to onsite substations and for the main cable connection to the point of grid connection. There is limited information provided for the actual cable routes within the PEIR information at this stage, so comments for this element of the project will be limited. However, it is agreed that the cable route connection element of the scheme is	No	Comment noted.

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		unlikely to generate much potential for likely significant landscape or visual effects if the mitigation hierarchy is followed, as no new overhead electricity transmission infrastructure is proposed as a design parameter, and the trenching work would be short duration and temporary in nature largely limited to construction phase effects.		
Wiltshire Council	Hydrology, flood risk and drainage / Soils and Agriculture	10.7. In section 4.0 (soil management), it is noted that as per the council's previous consultation comments, the applicant will be managing soil compaction in order to prevent an increase in runoff on the solar PV sites. 10.8. It is noted that in paragraph 4.1.5, it states that where disturbance to the soil occurs, post construction remediation (deep ploughing) may be required. It is the council's working assumption that all sites will need to be remediated. The applicant should provide details of proposed test regimes in order to confirm which sites would / would not need remediation post	No	An assessment on Soils is included within Environmental Statement (ES) Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The potential effects of construction and maintenance activities (including soil erosion and compaction) on soils will be minimised through adherence to measures contained within a Soil Resources Management Plan. An Outline Soil Resources Management Plan (SRMP) [EN010168/APP/7.15] has been submitted as part of the Development Consent Order (DCO) Application. Where required, post-construction remediation will be undertaken based on

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		construction. 10.9. Similarly, in paragraph 4.1.7, the applicant should also provide details of intermediate remediation to be carried out during construction such that there isn't an increase in flood risk during the temporary condition as a result of soil compaction.		site-specific assessments. Intermediate measures during construction will also be considered to maintain surface permeability.
Wiltshire Council	Ecology and biodiversity	5. The site sits in the Bristol Avon Corridor as defined in the Wiltshire Green Blue Infrastructure (BGI) Plan. It would take a significant part of that corridor, converting it from open farmland to a more enclosed and less diverse landscape. This could potentially affect the Avon catchment area and ecology. As such, the scale of the proposal would potentially cause significant harm to an important part of the BGI plan.	No	The Applicant notes that one of the goals of the BGI Plan is to halt loss of and improve biodiversity. The cessation of arable practices and reversion of land to grassland, in addition to new planting proposed in undeveloped areas of the Order Limits, will lead to a net gain for biodiversity. To demonstrate this a BNG Assessment for the Scheme is provided in the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] in line with best practice guidance, and a completed version of the Statutory Biodiversity Metric [EN010168/APP/7.9] provided.
Wiltshire Council	Hydrology, flood risk and drainage	10. Hydrology, Flood Risk and Drainage Considerations	No	The Applicant acknowledges this comment. Since publication of the Preliminary Environmental Information Report (PEIR),

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		10.1. Chapter 11 (Hydrology, Flood Risk and Drainage) of the PEIR suggests that the majority of the cable route connection corridor and the areas for the solar array are within Flood Zone 1 and at low risk of flooding. It is also confirmed that the preliminary assessment so far undertaken by the applicant is based on baseline and design information available at the time of writing and that a full assessment will be developed and refined following statutory consultation, and as additional information becomes available. The full assessment will be presented within the ES. 10.2. It is noted that the Water Framework Directive screening and scoping assessment referred to in paragraph 11.6.4, will require consideration from the council's ecology team, the Environment Agency (EA) and Natural England. This similarly applies to the potential impacts identified in section 11.8 and with respect to the suitability of mitigations in source protection zones 1.		the Scheme design has progressed and the environmental assessments have been updated accordingly. A full assessment of hydrology, flood risk and drainage is now presented in Environmental Statement (ES) Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], supported by a detailed Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. The assessment confirms that the majority of the solar array sites and cable corridors remain located in Flood Zone 1 and are at low risk of flooding. Where areas intersect with higher-risk zones, these have been assessed in accordance with the relevant policy tests and appropriate mitigation has been incorporated. The Water Framework Directive (WFD) screening and scoping assessment is presented in full within the submitted WFD Assessment Report [EN010168/APP/7.11], which considers

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				potential impacts on relevant waterbodies and Source Protection Zones (SPZs). The WFD Assessment Report [EN010168/APP/7.11] has been prepared with input from the Environment Agency and Natural England, and is available to Wiltshire Council's ecology team to support their review. The Applicant will continue to engage with all relevant consultees to ensure that the proposed mitigation is appropriate and that any residual risks are managed through the detailed design and permitting stages.
Wiltshire Council	Hydrology, flood risk and drainage	10.3. In respect of the Flood Risk Assessment and Drainage Strategy, contained within Volume 3, Appendix 11-1 to the PEIR, the council's Drainage Engineer has the following comments. 10.4. It is noted that in paragraph 1.1.1, it states that in some places the sites are at risk of flooding, primarily from pluvial sources. The determining authority (as well as the council in its capacity as a consultee)	No	The Applicant acknowledges this comment. The Sequential Test has been undertaken and is documented in the Planning Statement [EN010168/APP/7.2], with supporting information provided in Environmental Statement (ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. The test has been applied to each component of the Scheme individually, including the solar PV arrays,

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		will need to consider whether the site has passed the sequential test in so far as there are no other reasonably available sites at lower risk of flooding (noting that this is a planning judgement and not a technical drainage matter).		BESS units, substations and cable route. Where practicable, sensitive electrical infrastructure has been located in areas at lowest risk of flooding, predominantly Flood Zone 1. Where parts of the cable route or other ancillary infrastructure interact with areas of higher flood risk, this has been assessed in accordance with national policy, and mitigation has been embedded into the design to ensure resilience. This includes the use of flood-resilient materials and installation methods. The conclusions of the Sequential Test are a matter of planning judgement, but the technical evidence provided demonstrates that flood risk has been minimised and appropriately managed across all parts of the Scheme.
Wiltshire Council	Hydrology, flood risk and drainage	10.5. In paragraph 3.2.2, the proposal from the applicant to include 8m buffer zones around ordinary watercourses and main rivers is welcomed. It is considered that this will help to simplify and reduce the number	No	The Applicant welcomes the support for the embedded 8 metre buffer zones around all ordinary watercourses and main rivers. These are intended to preserve the natural function of watercourses, reduce the

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		of Land Drainage Consents / Environmental Permits required. 10.6. It states in paragraph 3.2.2, that solar panels etc. will be located outside of areas at risk of the 1 in 100 year plus climate change flood extents (i.e. the design flood), or where not practicable, to areas where there is less than 1m predicted flood depth. Whilst this is potentially a matter for detailed design, the council would like to understand these locations further and understand the detail of the flood modelling used in these locations. The applicant should be undertaking additional flood modelling in these locations so as to confirm predicted flood extents and depths to a higher degree of accuracy. This will likely need additional topographical survey to be completed.		requirement for individual permits, and provide safe access for maintenance during the operational life of the Scheme. With regard to flood risk, the Scheme has been designed to avoid development within the 1 in 100 year plus climate change flood extent wherever practicable. Where this has not been possible, infrastructure has been restricted to areas with low predicted flood hazard. This is based on the latest Environment Agency flood mapping, LiDAR data and, where necessary, site-specific hydraulic modelling. At Lime Down D, bespoke hydraulic modelling was undertaken to refine the understanding of fluvial flood risk. The results confirm that within the proposed development envelope, flood depths are predicted to be shallow, typically less than 300 mm. This allows appropriate resilience measures to be applied without increasing flood risk elsewhere. Full details are provided in Environmental Statement

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				(ES) Volume 3, Appendix 11.6: Flood Risk Assessment and Drainage Strategy – Lime Down D [EN010168/APP/6.3]. The assessment methodologies, including the use of available data and targeted site-specific modelling, have been agreed through consultation with the Environment Agency and Lead Local Flood Authority. These are considered proportionate to the level of risk and sufficient to inform the ES [EN010168/APP/6.1]. The outcomes are presented in ES Volume 3, Appendices 11.2 to 11.9 [EN010168/APP/6.3], which have guided infrastructure placement and the mitigation strategy.
Wiltshire Council	Hydrology, flood risk and drainage	10.10. In paragraph 5.3.6, the council agrees that the access tracks should be designed to be permeable. It is the council's expectation that the applicant will provide cross-sections / construction details to demonstrate that the access tracks will be permeable. Furthermore, access tracks should be installed to match existing ground	No	Access tracks will be constructed at existing ground level using permeable materials to avoid disruption of overland flow routes and ensure the infiltration capacity of the surface is maintained. This design approach is confirmed within Environmental Statement (ES) Volume 3, Appendix 11.1: Flood Risk Assessment and Drainage – Covering Report

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		level so that these do not alter overland flow paths.		[EN010168/APP/6.3] . Construction details, including typical cross-sections, will be developed at the detailed design stage in accordance with this strategy.
Wiltshire Council	Hydrology, flood risk and drainage	10.11. In respect of paragraph 5.3.7, the council's Drainage Engineer agrees in principle with managing surface water runoff through filter drains etc. However, calculations will need to be provided to demonstrate that these perform in accordance with the council's soakaway guidance (given that they are infiltration-based drainage systems).	No	The Applicant notes this comment. Filter drains are proposed in limited locations to manage runoff from small-scale infrastructure such as inverters and transformers, where the extent of additional hardstanding is minimal. These are not soakaways but shallow, linear infiltration features (i.e. French drains) designed to retain water close to its origin, promote infiltration into the surrounding soils, and limit the horizontal migration of surface water. As such, detailed soakaway calculations are not considered necessary. This approach aligns with best practice for managing runoff from dispersed infrastructure and is described in Environmental Statement (ES) Volume 3, Appendix 11.1: Flood Risk Assessment and Drainage – Covering Report [EN010168/APP/6.3] .

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Wiltshire Council	Hydrology, flood risk and drainage	10.12. In paragraph 5.3.8, the council's Drainage Engineer observes that whilst restriction of discharge to the greenfield 1 in 2 year rates will provide betterment against the more extreme return period events, the applicant should note the council's betterment policy and ensure that for the 1 in 1 / 1 in 2-year events, runoff is restricted to 70% of existing greenfield rates for the same storm event.	Yes	The Applicant notes this comment. The updated and the supporting Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] has regard to Wiltshire Council's betterment policy, and for events such as the 1 in 1-year and 1 in 2-year return periods, runoff will be restricted to 70% of the existing greenfield rate where reasonably practicable.
Wiltshire Council	Hydrology, flood risk and drainage	10.13. With regard to paragraph 5.3.10, the council's Drainage Engineer would expect the temporary drainage strategy for the sites to be provided in order for the council to confirm that these would not result in a temporary increase in local flood risk.	No	Surface water management during the construction stage will be addressed through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] , which sets out the principles for managing runoff and minimising localised flood risk during temporary works. Measures may include temporary perimeter bunds, silt fences, filter drains, and check dams to manage overland flow and reduce sediment transport. The Scheme does not involve large areas of impermeable surfacing during construction, and the works will be phased to minimise exposure of bare

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				ground. The Outline CEMP [EN010168/APP/7.12] secures the commitment to these measures, which will be refined through detailed design and approved in consultation with the local planning authority prior to construction.
Wiltshire Council	Hydrology, flood risk and drainage	10.14. In paragraph 5.5.1, it is suggested that the EA should be consulted on the foul strategy and provision of a septic tank. The applicant has currently described that the effluent will be stored and tankered off site; this could suggest that a cesspit may be proposed to be installed. It is considered that further clarification and consultation with the EA is required.	No	The Applicant confirms that the proposed foul water drainage strategy involves the use of sealed tanks with all effluent removed from site via tankering to a licensed facility. No discharge to ground or surface water is proposed, and no septic tanks or cesspits are included in the design. This strategy is set out in Section 5.5 of Environmental Statement (ES) Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage – Lime Down D [EN010168/APP/6.3]. Consultation has been undertaken with the Environment Agency, who have confirmed this approach is acceptable and does not require a permit. This approach is consistent with the assumptions presented in ES Volume 1, Chapter 11: Hydrology,

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				Flood Risk and Drainage [EN010168/APP/6.1].
Wiltshire Council	Hydrology, flood risk and drainage	10.15. The council's Drainage Engineer makes the general comment that the applicant will need to ensure that there is no change to existing overland flow routes as a result of the proposals to ensure that flood risk is not increased elsewhere. The applicant must ensure there is no filling / alteration to / culverting of watercourses (either temporarily or in the permanent case) without prior Land Drainage Consent from the Lead Local Flood Authority.	No	The Applicant confirms that the Drainage Strategy has been developed to ensure existing overland flow routes are preserved and that flood risk is not increased either on-site or elsewhere. The layout has been designed to avoid blocking or diverting surface water paths, with infrastructure such as access tracks and panel arrays sited to maintain existing hydrological connectivity. This approach is set out in the Environmental Statement (ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage – Covering Report [EN010168/APP/6.3] . While works to ordinary watercourses will be avoided where possible, some crossings for access may be necessary. Where this is the case, disapplication of the requirement for Ordinary Watercourse Consent is proposed through the Draft Development Consent Order (DCO), subject to agreement with Wiltshire Council as the Lead Local Flood

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				Authority. Any such works will be secured through protective provisions and the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], which includes embedded mitigation to ensure impacts are minimised and hydraulic connectivity is maintained.
Wiltshire Council	Hydrology, flood risk and drainage	10.16. In respect of the Lime Down D site, paragraph 3.2.5 indicates that BRE 365 soakaway testing is required. The council considers that this should be completed at this early stage to inform feasibility and not left to detailed design stage.	No	The Applicant confirms that infiltration testing in accordance with BRE 365 has been undertaken at the Lime Down D site. The results are set out in the Environmental Statement (ES) Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage – Lime Down D [EN010168/APP/6.3]. Testing was completed in January 2025 within Field D1, and demonstrated negligible infiltration, with no measurable infiltration observed after a three-hour test period. These results confirm that infiltration-based drainage is not feasible at this location. The surface water drainage strategy has therefore been developed using alternative techniques, including filter drains and swales, to

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				manage runoff in line with greenfield rates. This approach is embedded within the site-specific strategy presented in the ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage – Lime Down D [EN010168/APP/6.3] and forms part of the wider application documentation.
Wiltshire Council	Hydrology, flood risk and drainage	10.17. Again, with respect to the Lime Down D site, paragraph 3.8.5 suggests that calculations are to be provided that demonstrate that the full fire suppression flows can be accommodated within the proposed drainage without causing flooding of the site / elsewhere. It is the council's expectation that these are provided.	No	The Applicant confirms that infiltration testing in accordance with BRE 365 has been undertaken at the Lime Down D site. The results are presented in the Flood Risk Assessment and Drainage Strategy – Lime Down D [EN010168/APP/6.3]. Testing was undertaken in January 2025 within Field D1 and confirmed that infiltration is not feasible in this area. Surface water runoff from panelled areas will continue to drain as existing, with no increase in runoff rates anticipated. This conclusion is supported by the assessment findings, which demonstrate that the proposed development does not lead to measurable increases in peak runoff or volume. For the BESS and substation

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				areas, alternative surface water discharge routes have been assessed in line with the drainage hierarchy. Where attenuation is required to manage discharge rates, systems will be designed to prevent infiltration where necessary, subject to detailed design and firewater containment requirements. These areas will be drained using lined SuDS systems that include gravel subbases, flow control devices, and shut-off valves to prevent any uncontrolled discharge. Filter trenches are also proposed around isolated infrastructure, such as inverters, to promote localised infiltration during typical rainfall events. These features are designed to mimic existing hydrological conditions by retaining surface water in close proximity to the source and reducing the potential for lateral migration. This approach is set out in the Flood Risk Assessment and Drainage Strategy – Lime Down D [EN010168/APP/6.3] and is secured

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				through the Draft Development Consent Order (DCO).
Wiltshire Council	Hydrology, flood risk and drainage	10.18. Furthermore, with regard to the Causeway Flow Calculations for Lime Down D, it is considered that the applicant should set the Additional Storage Volume to 0 (not the 20m ³ /ha default) so as there is not an overprediction in attenuation on site.	Yes	The Causeway Flow modelling for Lime Down D has been updated as part of the Environmental Statement submission. The Additional Storage Volume parameter was reviewed during this process and set to 0 m ³ /ha in line with Wiltshire Council's guidance to ensure attenuation volumes are not overestimated. This approach is documented in Environmental Statement (ES) Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage – Lime Down D [EN010168/APP/6.3] , and will continue to inform the detailed design in accordance with the Council's requirements.
Wiltshire Council	Hydrology, flood risk and drainage	e) The exact design affecting watercourses. There must be no filling, alteration to or culverting of watercourses (either temporarily or permanently) without prior Land Drainage Consent from the Lead Local Flood Authority.	No	This matter is addressed within Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] , which confirms that all works affecting ordinary watercourses will be subject to appropriate consents. No permanent culverting, infilling or realignment of watercourses is proposed.

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				Any temporary works, such as access crossings required during construction, will be designed to maintain existing flow paths and minimise disruption. Further detail is provided within the Flood Risk Assessment and Drainage Strategy Appendices [EN010168/APP/6.3] , and implementation procedures are secured through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] .
Wiltshire Council	Hydrology, flood risk and drainage	f) Detailed flood modelling, which confirm the predicted flood extents and depths to a higher degree of accuracy. This will likely require additional topographical survey to be undertaken. g) Detailed calculations to be undertaken and provided to the council to demonstrate that filter drains perform in accordance with the council's soakaway guidance. h) BRE 365 soakaway testing to be undertaken.	No	f) Detailed site-specific flood modelling has been undertaken at Lime Down D and is presented in Environmental Statement (ES) Volume 3, Appendix 11-6: FRA and Drainage – Lime Down D [EN010168/APP/6.3]. Further modelling has been done for the Gauze Brook to refine predicted flood extents and depths. This has informed the site layout and final design submitted within the ES [EN010168/APP/6.1]. g) Filter drains are proposed to manage runoff from isolated infrastructure dispersed

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				throughout the panelled areas. These features are not soakaways and are not intended to provide significant attenuation. They promote localised infiltration and help retain water near its source while limiting horizontal migration. As they are not infiltration basins, detailed soakaway calculations in accordance with the council's soakaway guidance are not applicable. h) BRE 365 infiltration testing has been undertaken and is incorporated into the Flood Risk Assessment and Drainage Strategy Appendices [EN010168/APP/6.3]. The results have informed the feasibility of infiltration-based drainage solutions where proposed.
Wiltshire Council	Hydrology, flood risk and drainage	j) Confirmation that for 1 in 1 / 1 in 2-year events, runoff is restricted to 70% of existing greenfield rates for the same storm event. k) The temporary drainage strategy for the scheme which demonstrates that local flood risk will not be temporarily increased.	No	j) The updated Drainage Strategy for the Scheme applies Wiltshire Council's betterment policy, incorporating a 30% reduction to greenfield runoff rates for the 1 in 1 and 1 in 2-year storm events. This ensures that runoff from the site during these smaller events will not exceed 70% of

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		l) Applicant to undertake consultation with the EA on the foul strategy and provision of a septic tank. m) Detailed assessment to confirm that there will be no change to existing overland flow routes to ensure that flood risk is not increased elsewhere. n) Detailed assessment with calculations to demonstrate that the full fire suppression flows can be accommodated within the proposed drainage without causing flooding of the site and / or elsewhere.		existing greenfield rates, helping to manage downstream flood risk and align with local policy expectations. This approach is set out in Environmental Statement (ES) Volume 3, Flood Risk Assessment and Drainage Strategy Appendices [EN010168/APP/6.3]. k) Temporary surface water management will be implemented through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], which includes embedded measures to mitigate the risk of localised flooding during construction. This includes appropriate access management, mitigation of compaction, and temporary attenuation where required. These measures are designed to ensure that the construction phase does not result in any temporary increase in local flood risk. l) The foul drainage strategy confirms that effluent from welfare facilities will be stored in sealed tanks and removed from site via

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				tankering. No discharge to ground or surface water is proposed, and a cesspit is not proposed. Consultation has been undertaken with the Environment Agency, who have confirmed this approach is acceptable and does not require a permit. This approach is consistent with the assumptions presented in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. m) The Scheme has been designed to preserve existing overland flow routes. Infrastructure such as access tracks will follow existing ground levels and use permeable materials to avoid creating obstructions or redirecting surface water. These embedded measures ensure that the Scheme will not increase flood risk elsewhere. Where any crossing of watercourses is required, separate Land Drainage Consent will be secured from the Lead Local Flood Authority. These commitments are secured within the Flood Risk Assessment and Drainage Strategy

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				Appendices [EN010168/APP/6.3] and the Outline CEMP [EN010168/APP/7.12]. n) A worst-case scenario comprising the simultaneous occurrence of the maximum firefighting water volume and a 1 in 10-year rainfall event has been used to inform the BESS and substation drainage design. The proposed systems include sealed drainage and containment with appropriate attenuation capacity. These systems will ensure that combined flows can be managed without causing on-site or off-site flooding. Calculations demonstrating this are included within the site-specific appendices to the Flood Risk Assessment and Drainage Strategy provided in ES Volume 3, Appendices 11.2 to 11.8 [EN010168/APP/6.3], and the design will be further refined at detailed design stage in line with this conservative assumption.
Wiltshire Council	Ecology and biodiversity / Noise and vibration	Assessment of Likely Impacts and Effects: 8.77. General points regarding the	Yes	The applicant notes this comment. An assessment of impacts relating to operational noise and vibration on ecological features is presented in

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		assessment of likely impacts and effects in Chapter 9 (Ecology and Biodiversity) are set out below. 8.78. Chapter 3 (The Scheme) specifies that there would be either one or two locations where the BESS would be situated, namely in Field D1 and Field D18 within Lime Down D. It explains that each of the individual BESS Battery Containers would have an integrated heating, ventilation, and cooling (HVAC) system which may entail a HVAC system that is external to the container, located either on the top of the unit or attached to the side of the unit. If this uses air to heat and cool the BESS Battery Containers it would have a fan built into it that is powered by auxiliary power. 8.79. It is therefore assumed that the BESS Battery Containers and integrated HVAC systems could generate some noise and / or vibration particularly on account of the in-built fan. The potential for operational		Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] which concludes there would be no resulting significant effects.

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		disturbance as a result of low-level noise associated with electrical equipment is cited in paragraph 9.8.3 of Chapter 9 (Ecology and Biodiversity). Nevertheless, the potential for impacts on ecological receptors as a result of noise and / or vibration that may be generated by the BESS Battery Containers, as well as other solar park infrastructure such as the sub-stations, has not been fully assessed in Chapter 9. It is possible that bats and birds in particular, could be subject to disturbance during the operational phase as a result of an increase in noise and vibration associated with the solar park infrastructure, especially as one of the BESS locations is immediately adjacent to an area of woodland in Lime Down D. Potential for effects on bats and birds as well as other species, has not been assessed in the respective sections of Chapter 9. Therefore, further consideration should be given to the potential for effects arising from noise and vibration generated		

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		during operation and that it may need to be assessed in more detail in the ES.		
Wiltshire Council	Ecology and biodiversity / Noise and vibration	8.80. Chapter 3 (The Scheme) states that it is considered likely that east-west single axis tracker Solar PV Mounting Structures (Option A) will be used within all Solar PV Sites, unless there are practical or environmental constraints at an individual field level that make it necessary to use fixed south facing Solar PV Mounting Structures (Option B). It is apparent that a tracker system involves attaching the Solar PV Panels to a motorised table that can move in relation to the sun. As such, it is assumed that the tracking / tilting of the panels and the motor may generate a degree of noise. The potential for operational disturbance as a result of low-level noise associated with electrical equipment is cited in paragraph 9.8.3 of Chapter 9 (Ecology and Biodiversity). Most notably, birds could be subject to disturbance during the operational phase as a result of an increase in noise and vibration associated with movement of the	Yes	An assessment of impacts relating to operational noise from tracker Solar PV Mounting Structures on birds is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] which concludes there would be no resulting significant effects.

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		solar panels during daylight hours. However, the potential for effects on ecological receptors hasn't been fully discussed in Chapter 9 and there is no discussion in the section of the assessment pertaining to birds. If this potential effect has been screened out due to it having been assessed that any noise / vibration / movement generated by the operation of the solar panels would not lead to significant effects and so hasn't been included in Chapter 9 to be taken forward to the ES, then it would be prudent to provide this rationale.		
Wiltshire Council	Ecology and biodiversity / Noise and vibration	Non-Statutory Designated Sites: 8.93. Fagot Heath, The Privet, fox Covert and Corsham Wood LWS lie within the CRSC. In terms of potential construction phase impacts, Chapter 9 (Ecology and Biodiversity) specifies that installation of the cables could result in direct impacts on the LWS through damage to, or removal of habitat and the council concurs with that assessment. Chapter 9 then explains the	No	The Applicant notes this comment. A full assessment of potential impacts of the Scheme on designated sites is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . The refined Cable Route Corridor now avoids Fagot Heath, The Privet, Fox Covert and Corsham Wood LWS.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		refined CRC is expected to avoid this LWS but that if it cannot be avoided, HDD would be employed and concludes that no significant effects are anticipated. However, if the LWS could not be avoided and HDD were to be employed, it is the council's Ecology and Biodiversity Officer's view that the potential for residual significant effects may remain. This is because even with use of HDD technology and implementation of other measures, the potential for noise and vibrations generated by the use of HDD and an increase in noise, lighting, dust etc. associated with an increase in activity / personnel and use of vehicles, plant and machinery in the vicinity of the woodland to have an impact on the woodland and the species it supports may persist. Furthermore, at present it isn't clear where site compounds would be sited within the CRC and these could also have an impact. As such, it is considered that at this stage and in the absence of field survey data for the CRSC, a conclusive assessment regarding the potential for residual impacts		

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		on the LWS should be withheld until more information is available as it may transpire that further bespoke mitigation measures are required if the LWS were to be affected as a result of the cable route refinement.		
Wiltshire Council	Ecology and biodiversity / Landscape and visual	Plant new areas of mixed native broadleaf woodland or identify areas for natural regeneration of woodland in areas which would help deliver improved habitat connections. Consideration could also be given to introducing new field corner copses and trees as stepping stones to link with and extend existing areas of woodland and tree cover, where this would not lead to the loss of existing important scenic or heritage views or harm other existing valued habitat types or impact the buried archaeological resource.	Yes	Specific mitigation measures and enhancement plans are included in the Environmental Statement (ES) Volume 2: Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] . The measures are also described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .
Wiltshire Council	Ecology and biodiversity / Consultation and engagement	8.11. In light of the above, it is suggested that a supplementary public consultation is carried out whereby all interested parties, including the council, are formally re-consulted once pending surveys have been conducted and any mitigation and compensation	No	The Applicant notes this comment. The Preliminary Environmental Information Report (PEIR) provides a snapshot of the Applicant's assessment at the time statutory consultation is undertaken, providing the information required for consultation bodies to develop an informed

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		measures have been determined, where required. This is particularly pertinent in light of the need for a Habitats Regulations Assessment (HRA) and the necessity to ascertain the potential for effects on the Bath and Bradford-on-Avon Bats Special Area of Conservation (BBOA Bats SAC) and its qualifying species as a result of the proposed CRC. (This is discussed later in this response; however, the applicant's ecological consultant was provided with a Technical Briefing Note regarding this matter by Wiltshire Council's ecology team in autumn 2024 and there are details in the Scoping Opinion). Determination of survey scope within the CRSC needs to take account of the information detailed in the aforementioned Technical Briefing Note and the results of survey should inform the final CRC.		view of the likely significant environmental effects of the proposals. The Applicant considers the amount of information published during statutory consultation was sufficient and in accordance with this standard for preliminary environmental information, and that further statutory consultation is not required in relation to the refined Cable Route Corridor, this being located within the Cable Route Search Area already consulted upon. The Technical Briefing Note referred to by the respondent has been fully considered in the assessment of impacts on the Bath and Bradford-on-Avon Bats SAC within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and in the Habitat Regulations Assessment Report [EN010168/APP/7.10]
Wiltshire Council	Ecology and biodiversity (Arb)	9. Arboriculture Considerations 9.1. It is acknowledged that the Tree Constraints Plans and Arboricultural Report	No	Anticipated impacts to existing arboricultural features within the influence of the Scheme, including the cable route corridor, have been assessed as part of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		submitted as part of Chapter 10 (Arboriculture) of the PEIR identifies the information that the applicant had suggested would be provided. However, due to the limited details within the report and plans, it is not currently possible for the council's Arboricultural Officers to assess the full impact of the proposal on arboricultural assets within the confines of the entire scheme.		Environmental Statement (ES) [EN010168/APP/6.1] Volume 1 Chapter 10: Arboriculture [EN010168/APP/6.1] forming the Arboricultural Impact Assessment [EN010168/APP/6.1] . The Outline Arboriculture Method Statement [EN010168/APP/6.3] also provided with the ES [EN010168/APP/6.1] specifies the necessary protective and / or mitigation measures in order that direct impacts to trees are avoided and/or mitigated or compensated for.
Wiltshire Council	Ecology and biodiversity (Arb)	9.2. It is noted that the Inspectorate's comments in the EIA Scoping Opinion stated: <i>"the Cable Route Search Area is still to be defined and the potential for arboricultural impacts from construction activities, it is not proposed to scope out the impacts to trees within the Cable Route Area (once refined) at this point. It is further stated that this will be kept under review and due to proposed mitigation and refinement of the route, the potential for impacts may be unlikely and</i>	No	The Preliminary Environmental Information Report (PEIR) provides a snapshot of the Applicant's assessment at the time statutory consultation is undertaken, providing the information required for consultation bodies to develop an informed view of the likely significant environmental effects of the proposals. The Applicant considers the amount of information published during statutory consultation was sufficient and in accordance with this standard for preliminary environmental information, and that further statutory

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		<i>there is potential for the Cable Route to be scoped out of the ES."</i> 9.3. Therefore, since the cable connection route has not been defined and the impacts on the trees has not been determined at the time of the PEIR for assessment within the consultation, all arboricultural features within this area should be fully considered within the ES. 9.4. The council recommends that the applicant undertakes a supplementary consultation in advance of DCO submission, to enable these matters to be properly considered.		consultation is not required in relation to the refined Cable Route Corridor, this being located within the Cable Route Search Area already consulted upon. A full tree survey of the cable route corridor has been undertaken, the results of which are shown in Environmental Statement (ES) Volume 2 Figure 10-1-1 to 10-1-23 Tree Constraints Plans [EN010168/APP/6.2]. Impacts to trees along the cable route corridor are shown in ES Volume 2 Figure 10-2-1 to 10-2-23 Tree Impacts Plans [EN010168/APP/6.2] and are summarised and considered fully within ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EN010168/APP/6.3]. The above plans were sent to Wiltshire Council on 5th September 2025.

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Wiltshire Council	Ecology and biodiversity (Arb)	9.5. It is the council's expectation that at the time of the DCO submission, detailed documents including the Arboricultural Impact Assessment, Tree Constraints Plans, Tree Protection Plans and Arboricultural Method Statement, prepared in accordance with BS5837:2012, should be provided. This will ensure that the impact of the proposal in its full detail is determined, and to ensure that sufficient consideration has been given to all trees and hedgerows within the scheme proposals.	No	Anticipated impacts to existing arboricultural features within the influence of the Scheme have been assessed as part of Environmental Statement (ES) Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EN010168/APP/6.3] , inclusive of baseline tree constraints plans and tree impact plans. The Outline Arboricultural Method Statement [EN010168/APP/6.3] , specifies the necessary protective and / or mitigation measures in order that direct impacts are suitably controlled. Effects to hedgerows are considered within ES Volume 1 Chapter 9 Ecology and Biodiversity [EN010168/APP/6.1]
Wiltshire Council	Ecology and biodiversity	4. An Ecology Mitigation and Enhancement Plan (EMEP) to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase. This should include a scaled drawing showing all existing ecological features, together with mitigation and enhancement measures	No	These has been set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , Figure 3-4: Ecological Landscape and Mitigation Plan [EN010168/APP/6.2] and the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18] .

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		in relation to the solar panel layout. It should also specify buffer distances, locations of new planting, sowing and other permanent features, whether retained or created.		
Wiltshire Council	Ecology and biodiversity	6. The applicant wishes to deliver 10% Biodiversity Net Gain. In the revised Local Plan this would need to be 20% to meet the Local Plan targets. There is; however, no evidence supplied to demonstrate how this uplift could be achieved when the land use will be modified grassland and there is no clear baseline for net gain as things stand. Unless the applicant can clearly demonstrate how 20% net gain can be delivered and from what baseline, the application should not be able to proceed.	No	As the Scheme is a National Significant Infrastructure Project (NSIP), it is not yet mandatory to achieve 10% measurable Biodiversity Net Gain, with this requirement for NSIPs expected to be made mandatory for applications made from May 2026. Nevertheless, a BNG Assessment for the Scheme is provided in Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and a completed version of the Statutory Biodiversity Metric [EN010168/APP/7.9] provided, both of which demonstrate the Scheme will achieve BNG of at least 10% in Habitat Unit, Hedgerow Units and Watercourse Units.
Wiltshire Council	Ecology and biodiversity	7. There are significant outstanding concerns regarding species of concern including bats, ground nesting birds, brown hares, great crested newts and white	No	The Applicant notes these concerns. A more detailed assessment of impacts on ecological features than was available at Preliminary Environmental Information

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		clawed crayfish. As things stand, there are serious concerns around the protection of those species which would mean that the planning application could not be approved until they are overcome. There is a specific issue regarding grazing on the site. The assessment from the developer is that it is assumed there would be no grazing during the operation of the solar park however the new Local Plan Policy 86 bullet h requires that grazing is carried out in areas with defined bat sustenance zones.		Report (PEIR) stage is now available within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . The Scheme will result in no changes to grazing regimes with the defined bat sustenance zones referred to by the respondent.
Wiltshire Council	Ecology and biodiversity	8. Ecology and Biodiversity Considerations Response Context: 8.1. This response considers the information provided within the submitted PEIR (January 2025) with a primary focus on Volume 1, Chapter 9 (Ecology and Biodiversity), the suite of Volume 2 supporting figures and Volume 3, Appendix 9.1 to Appendix 9.9. Comments are also provided on other chapters and figures where relevant to the consideration of ecology and biodiversity matters.	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	8.2. It is noted that this statutory consultation phase is within the pre-application stage of the DCO process. Therefore, the objective of the comments, observations and recommendations detailed herein is primarily to provide feedback and steer regarding whether the methodology and approach to the assessment of potential impacts on ecology and biodiversity likely to result from the Lime Down Solar Park scheme as set out in the PEIR, is on the right trajectory and whether it is sufficient to facilitate an informed planning judgement on the likely significant effects arising from the proposed Scheme.	No	Comment noted.
Wiltshire Council	Ecology and biodiversity	8.3. In light of the vast amount of information that required review within a short period of time, please note that this response focuses on issues, concerns, queries or outstanding information that warrant dedicated discussion and those matters where provision of specific feedback or steer has been considered necessary to ensure	No	Comment noted.

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		appropriate and best outcomes for biodiversity and ecology through the EIA process. The objective of this response is therefore, not to summarise or provide details of all matters discussed within the PEIR or to discuss every single ecological receptor. Instead, only those receptors where a particular issue, concern, query or so forth needs to be raised is detailed herein. As such, this response should not be relied upon as a summary of all matters detailed in the PEIR in relation to ecology and biodiversity but instead, as an evaluation of the submitted PEIR.		
Wiltshire Council	Ecology and biodiversity	Consultation Documents: General Observations and Overarching Comments: 8.4. It is evident from a review of the PEIR, that additional areas have been added to the Scheme Boundary as paragraph 9.6.15 of Volume 1, Chapter 9 (Ecology and Biodiversity) states: "All land at the Solar PV Sites will be subject to the same survey scope. At the time of writing, a lesser degree of survey work has been completed	No	Comment noted

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		on the areas of land within Lime Down C and D that were added in February 2024, and still less at the further areas of land within Lime Down C that were added in June 2024, owing to their later addition into the Scheme and the reduced time available for survey work to this point. However, survey across all Sites will be equalised at the point of submission of the DCO application."		
Wiltshire Council	Ecology and biodiversity	8.5. Volume 3, Appendix 9-3 specifies that the first parcels of additional land included within the Scheme Boundary were added in March 2024 rather than February 2024, so there is some discrepancy between the various submitted chapters and appendices in this regard. Nonetheless, paragraph 1.2.19 of Appendix 9-3 explains: "In March 2024, approximately 67.1ha of land was added to the Scheme Boundary, 14.4ha of which was added to Lime Down C with 52.7ha added to Lime Down D. Additionally, approximately 44ha of land was added to Lime Down C in June 2024."	No	Comment noted. The Applicant notes that clarification on this point is provided in Environmental Statement (ES) Volume 3, Appendix 9-3: Bat Survey Report [EN010168/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	8.6. The council's ecology and biodiversity officer notes that a rationale for the addition of these areas at a later stage along with a clear map / plan showing the extent of the respective areas does not appear to be provided within the PEIR, clarity from the applicant would be welcomed. Whilst these additional areas may seem relatively small in comparison to the total area covered by the Solar PV Sites, it is worth highlighting that the areas added in February and June 2024 are of a considerable size in their own right. It is therefore considered that sufficient ecological baseline information for these additional areas should have been included within the PEIR at the statutory consultation stage to ensure that adequate information was provided to facilitate a suitably informed response to this proposed scheme from the council.	No	Comment noted. Ecological baseline information for the total area covered by the Solar PV Sites, including those areas added to the scheme at a later date, is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] as well as ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-7: Wintering Bird Survey Report [EN010168/APP/6.3] .
Wiltshire Council	Ecology and biodiversity	8.7. Volume 1, Chapter 6 (EIA Methodology) states: "The final routing of the cables which connect the Solar PV Sites and the Solar PV Sites to the existing National Grid substation is yet to be defined	No	The Applicant notes this comment. A detailed assessment of impacts in relation to the refined Cable Route Corridor is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		for the PEIR...The final Cable Route Corridor will fall within the Cable Route Search Corridor presented at PEIR, with the final route refined as more information is gathered from fieldwork and through consultation. As such, the assessment of effects in relation to the Cable Search Route Corridor for the majority of topics is necessarily preliminary in this PEIR. Further detailed assessment will be undertaken based on a Cable Route Corridor that will be defined following statutory consultation. Detailed assessment will be contained within the ES submitted with the DCO Application." 8.8. Contrary to the stipulation in the previously submitted Scoping Report that the PEIR would provide details of a refined cable route, the Cable Route Corridor (CRC) has not been refined. Furthermore, there have been no surveys conducted in the Cable Route Search Corridor (CRSC) to date with the exception of some survey at the former proposed location for the BESS at Land near Melksham Substation and as		Biodiversity [EN010168/APP/6.1]. This is supported by baseline ecological information collected from within the Cable Route Corridor which is presented in ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-6 Water Vole and Otter Survey Report [EN10168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		such, the ecological baseline of the CRSC hasn't been established. Therefore, insufficient information has been provided at this stage in the PEIR to enable provision of suitably informed comments regarding this element of the Scheme.		
Wiltshire Council	Ecology and biodiversity	8.9. Given that all surveys are either ongoing or yet to be undertaken in 2025 for the additional areas at Lime Down C and D, and all surveys in the CRSC are currently pending and due to be conducted in 2025, it is not feasible at this stage to provide suitably informed, wholly robust commentary on the likely efficacy and adequacy of mitigation and compensation proposed in relation to a number of ecological receptors. Furthermore, mitigation packages are not confirmed and are still being explored for several species / species groups.	No	The Applicant notes this comment. A detailed assessment of impacts in relation to the refined Cable Route Corridor is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This is supported by baseline ecological information collected from within the Cable Route Corridor which is presented in ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-6 Water Vole and Otter Survey Report [EN010168/APP/6.3] .
Wiltshire Council	Ecology and biodiversity	8.10. Moreover, Volume 1, Chapter 3 (The Scheme) states: "Once the full suite of species surveys has been carried out any new habitat land and / or mitigation that is appropriate will be identified and included in	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the DCO application.” This extract from Chapter 3 serves to augment the above point in so far as the council cannot form a robust stance at this stage regarding the appropriateness and adequacy of mitigation and compensation detailed in the PEIR as the pending survey will potentially necessitate the provision of more mitigation and compensation than has been put forward to date.		
Wiltshire Council	Ecology and biodiversity	8.13. It is evident that at present the PEIR and supporting plans don’t include any details regarding the potential number and / or location of temporary construction compounds that it is understood will be constructed within the Solar PV Sites and the CRSC. Assessment of the siting of compounds within the CRSC is particularly important due to areas of the CRSC falling with consultation zones associated with the BBOA Bats SAC and core areas around Bechstein’s bat core roosts that are considered to be functionary linked with the BBOA Bats SAC. In addition, information regarding the size and proposed locations	No	A detailed assessment of impacts in relation to the refined Cable Route Corridor is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The locations of Temporary Construction Compounds are shown in ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		of on-site car parking areas for site personnel, as well as confirmation of any new highway improvement works haven't been provided. As such, it is considered that Volume 3, Chapter 9 (Ecology and Biodiversity) effectively omits robust assessment of these elements of the construction phase.		
Wiltshire Council	Ecology and biodiversity	8.14. The biodiversity net gain (BNG) requirement for NSIPs to achieve at least 10% measurable net gain on all terrestrial and intertidal development, which is to be secured for at least 30 years, will be mandatory from November 2025. As such, it is recognised that delivery of BNG is not mandatory for this NSIP at the present time. However, Core Policy 50 of the Wiltshire Core Strategy (adopted January 2015) requires no net loss of biodiversity and for major development to achieve a net gain; albeit the latter requirement is not quantified as a percentage in the policy as it was adopted prior to mandatory BNG. 8.15. Nevertheless, it is noted that the PEIR	No	A BNG Assessment for the Scheme is provided in Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and a completed version of the Statutory Biodiversity Metric [EN010168/APP/7.9] provided, both of which demonstrate the Scheme will achieve BNG of at least 10% in Habitat Unit, Hedgerow Units and Watercourse Units.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		indicates that the proposed scheme will achieve at least 10% BNG. Please note that it has not been possible for the council to verify the percentage of BNG that could be delivered because neither Chapter 9 or Appendix 9-1 or any of the other supporting appendices include habitat condition assessment sheets, species lists or a completed Statutory Biodiversity Metric. This information will be required as part of the DCO submission. Please be advised however, that for the purposes of ensuring no net loss of biodiversity and delivery of BNG, the council has adopted a precautionary stance and assumes that only modified grassland can be achieved under the solar panels. This is discussed further herein.		
Wiltshire Council	Ecology and biodiversity	8.16. An Outline Landscape and Ecology Management Plan (LEMP) (Volume 3, Appendix 9-8) has been submitted alongside the PEIR. Whilst the preparation of the Outline LEMP is welcomed, the Council reserves the right to comment on this document in future given that ecological	No	Mitigation and enhancement measures to be implemented as part of the Scheme are described in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . These are shown within ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		surveys and details of mitigation and compensation are still outstanding. 8.17. The ecological assessment presented in Chapter 9 (Ecology and Biodiversity) and the BNG projections on submitted plans appear to assume that there will be provision of enhancement measures for ecology and biodiversity, and this is welcomed. However, paragraph 1.4.3 of Volume 1, Chapter 1 (Introduction) indicates that the applicant may opt not to deliver these enhancement measures as it specifies: <i>“Over and above the secured mitigation measures, the Applicant is also considering providing various enhancement measures to provide additional biodiversity and community benefits. These enhancement measures are not required to mitigate significant adverse effects of the Scheme. The Applicant may or may not provide those enhancement measures and one of the purposes of this consultation is to obtain opinions on the types of enhancement measures to be considered.”</i>		Plan [EN010168/APP/6.2]. The Outline Landscape and Ecological Management Plan [EN010168/APP/7.18] sets out how all proposed mitigation and enhancement measures will be established, managed and monitored for the duration of the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		It is recommended that enhancement measures are provided and that ongoing liaison with the council and other stakeholders is undertaken on this matter.		
Wiltshire Council	Ecology and biodiversity	Appraisal of Ecological Baseline Conditions and Associated Survey Methodology: 8.18. The Council has a couple of general observations collated during the review of the PEIR, particularly Appendix 9-1, and these are as follows: • Appendix 9-1 doesn't provide comprehensive botanical species lists at the back of the report. Therefore, although some species are listed under each habitat type in the main body of the report, the whole list of species identified within each habitat has not been provided. This is required so that the botanical assemblage and number of different species at the identified habitats can be reviewed. • Target Notes have not been included on the Baseline Habitat Maps (Figures 9.1.8 to 9.1.12) and have not been tabulated at the	Yes	The Applicant notes this comment. Botanical species data from grassland quadrat surveys is provided within the Biodiversity Net Gain Assessment Report [EN10168/APP/7.8]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		back of Appendix 9-1 as would have been expected in accordance with the adopted survey methodology. If the decision was taken not to use Target Notes, perhaps on account of the size of the Scheme, it would be helpful for a rationale to be provided within Appendix 9-1.		
Wiltshire Council	Ecology and biodiversity	8.19. General observations regarding the evaluation of the ecological baseline and associated survey methodology as detailed in Volume 1, Chapter 9 (Ecology and Biodiversity) of the PEIR are set out below. 8.20. Paragraph 9.3.12 of Chapter 9 specifies that the NPPF had most recently been revised in December 2023. This wasn't the case at the time that Chapter 9 was published (January 2025) and so if the intention was for the applicant's assessment to continue to cite the NPPF from 2023, it is recommended that this is stipulated in any future assessment work and the ES. 8.21. In respect of the Solar PV Sites, Chapter 9 states that a suite of baseline ecological surveys have been undertaken since June 2023 and will	Yes	The Applicant notes this comment. Reference to the most up-to-date NPPF revision is included within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . A detailed assessment of impacts in relation to the refined Cable Route Corridor is provided within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This is supported by baseline ecological information collected from within the Cable Route Corridor which is presented in ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3] . It is recognised this information was not available at Preliminary

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		continue into 2025. It then explains that the EIA is iterative, and whilst this is agreed, it is deemed that in itself doesn't comprise a sound rationale for the total omission of any baseline ecological surveys in respect of the CRSC. 8.22. In terms of the CRSC, paragraph 9.6.16 of Chapter 9 specifies that the CRC will be assessed in the ES. It then states that disturbance will be limited, that the cable installation works will be temporary and will occur progressively in one direction, and that works will be carried out via a combination of open cut trenching and Horizontal Directional Drilling (HDD), with the latter likely to be employed where ecological features of an increased importance or sensitivity (e.g. main rivers, important hedgerows or Priority Habitats) are to be crossed by the route, and where less impactful routes could not be followed. 8.23. Whilst these points regarding employment of appropriate technologies during construction are duly noted, this in itself is not deemed to comprise a sound		Environmental Information Report (PEIR) Stage

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		justification for the PEIR to have been submitted with complete omission of any field survey data pertaining to the CRSC. Although the council is not the determining authority for this NSIP project, and although the PEIR is intended to comprise a 'preliminary' report, it is nevertheless considered that the documentation submitted at this statutory consultation stage should have been sufficiently advanced in terms of the ecological baseline information and details of mitigation and compensation presented therein to facilitate a suitably informed and robust review of the Scheme proposals and response from the council and other consultee. Although it is recognised and accepted that the PEIR can present preliminary information, that is not to say that total omission of any ecological baseline information in the form of actual field survey results is acceptable. Provision of desk-based information and field survey information pertaining to the Land near Melksham Substation, which was formerly		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		proposed as the BESS site, is not deemed to be adequate to inform robust assessment of impacts in the PEIR. It is therefore considered that there has been an over-reliance on the PEIR being a 'preliminary' document and also a potential overreliance on the Rochdale Envelope approach.		
Wiltshire Council	Ecology and biodiversity	8.24. In respect of the CRSC, paragraph 9.6.17 stipulates that the survey scope has not yet been finalised but that it will be determined once the CRC has been further refined. Therefore, although this paragraph of Chapter 9 goes on to set out what the applicant considers to be a proportionate survey scope, the Council does not wish to comment on this prematurely and instead can provide its stance / feedback once the CRC has been further refined. 8.25. It is noted that Chapter 9, paragraph 9.6.20 specifies that design considerations are ongoing with regards to the potential need for and extent of Highways Improvement Areas and associated works.	No	The Applicant notes this comment. The scope of survey is set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		It states that further surveys will be undertaken if required, which will be detailed in the ES. Provision of the scope of any necessary survey to the council would also be welcomed at that point in time.		
Wiltshire Council	Ecology and biodiversity	Designated Sites: 8.26. Volume 3, 9-1: Ecological Baseline Report stipulates: “3.1.3 <i>There are no internationally designated sites for nature conservation within the CRSC. However, two consultation zones, also known as ‘Core Areas’, lie within the CRSC.</i>” The Council considers that this is not wholly accurate as there are more than two consultation zones. Whilst some of the consultation zones and core areas overlap, there are a greater number of zones than indicated in the appendix. In addition, the paragraph doesn’t mention that the consultation zones are associated with BBOA Bat SAC component sites and core roosts that are considered to be functionally linked to the BBOA Bats SAC as the precautionary principle has been applied in	Yes	The Applicant notes this comment. Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] expands on this point and provides clarification on what the consultation zones constitute.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the absence of evidence to the contrary. It is recommended that the applicant refers to the Technical Briefing Note provided to the applicant's ecological consultant in autumn 2024 for further information together with the council's Scoping Response.		
Wiltshire Council	Ecology and biodiversity	8.27. It is not apparent why the BBOA Bat SAC consultation zones and core areas around core roosts that are functionally linked to the SAC have been illustrated on Figure 9.1.4 – Non-Statutorily Designated Sites within the Cable Route Search Corridor. Although the consultation zones around the BBOA Bats SAC and core areas around core roosts that are functionally linked to the SAC don't formally constitute part of the statutorily designated Bats SAC, they do comprise areas that may be used by the qualifying species and which is considered to be functionally linked land. As such, it may be more appropriate to map these zones on a separate dedicated map rather than on a map pertaining to non-statutory designated sites.	Yes	The Applicant concurs that a separate figure showing the BBOA Bat SAC consultation zones is more appropriate. This has been provided within Environmental Statement (ES) Volume 2, Figure 9-1-4: Wiltshire Impact Zones for Bats [EN010168/APP/6.2]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	8.28. Paragraph 9.3.3 of the PEIR Volume 1, Chapter 9 (Ecology and Biodiversity) states that Likely Significant Effects (LSE) in relation to international sites, will be considered within a HRA report that will be included along with the ES as part of the DCO application." The recognition of the need for HRA in Chapter 9 is welcomed, and the potential for effects on the BBOA Bats SAC and its qualifying species and functionally linked core roosts and associated core areas needs to be considered.	No	A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC which concludes the Scheme will not have significant effects on the designated site.
Wiltshire Council	Ecology and biodiversity	Habitats 8.29. In Section of Appendix 9-1, there seems to be a lack of consistency in terms of when details pertaining to the Land near Melksham Substation site are provided and it appears that only those habitats of lower intrinsic value are discussed such as arable and modified grassland. It's not apparent why this is the case, but it is recommended that this is addressed.	No	Following the preliminary assessment work presented in the Preliminary Environmental Information Report (PEIR), the area near Whitely proposed for potential BESS development (referred to as Land at Melksham Substation within the PEIR) is no longer proposed for BESS. Part of this area remains within the Order Limits and is included within the Cable Route Corridor, with an assessment of impacts to habitats within the Cable Route Corridor set out in Environmental Statement (ES) Volume 1,

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]
Wiltshire Council	Ecology and biodiversity	Modified Grassland: 8.30. Appendix 9-1 stipulates that several fields across the Solar PV Sites comprise modified grassland that are either grazed by cattle or sheep or were in grass silage production. Paragraph 3.2.22 states that the modified grassland is of relatively low intrinsic value for biodiversity, is ubiquitous in the wider landscape, and is considered to be of no more than Site Importance. Whilst it is appreciated that the intrinsic botanical value of cattle grazed permanent pasture is likely to be low, this habitat is an important foraging resource for horseshoe bats, especially greater horseshoe bats.	No	The evaluation of modified grassland habitat within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and ES Volume 3, Appendix 9-1 Ecological Baseline Report [EN010168/APP/6.3] is primarily based upon its botanical characteristics and distinctiveness. The Applicant acknowledges that cattle-grazed pasture is important for horseshoe bats, although the assessment of the habitats within the Order Limits in terms of value to foraging bats is made separately under the relevant 'bats' subheading of both reports.
Wiltshire Council	Ecology and biodiversity	Other Neutral Grassland: 8.31. Appendix 9-1 states: <i>"A relatively small extent of habitat across the Solar PV Sites were classified as falling under the UKHab habitat type 'Other neutral grassland'. This habitat covered an area of</i>	No	To confirm there is no habitat which would qualify as lowland meadow with the Order Limits. Botanical species data from grassland quadrat surveys from all grassland fields is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		<i>12.73ha or 1.45% of the total extent of the Solar PV Sites...Other neutral grassland was generally restricted to a small number of fields or portions of fields within Lime Down E which showed less evidence of intensive agricultural management and input than other grassland parcels at the Solar PV Sites. This habitat was also noted occasionally within some field margins at Lime Down C."</i> 8.32. Section 3.2.29 states that when considered as a whole, the areas of other neutral grassland are of moderate botanical interest and considered to be of Local importance. The Appendix lists 17 species of flora within Field E12, and it is specified that Field E18 has areas of more diverse grassland with some herbaceous species which are indicative of degraded calcareous meadow. Species lists have not been included at the back of Appendix 9-1 and as such, the number of species of flora identified is not actually known and the baseline report does not discuss whether		Lowland meadow habitat is present within two Local Wildlife Sites (LWSs) adjacent to Lime Down E.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		any of the areas of other neutral grassland comprise lowland meadow and if so, whether any areas could qualify as priority habitat / Habitat of Principal Importance (HPI). It is therefore suggested that clarity on this matter is provided and that any areas of lowland meadow are illustrated on the Baseline Habitats Maps (Figures 9.1.8 to 9.1.12) especially given that other technical appendices specify that lowland meadow exists on site even though this seems to have been omitted from the Baseline Report. For example, Appendix 9-4: Breeding Birds Survey Report refers to fields at Lime Down E as comprising cattle-grazed pasture and lowland meadow habitat.		
Wiltshire Council	Ecology and biodiversity	8.33. Table 9-7 in Chapter 9 sets out that other neutral grassland covers 1.45% of the Solar PV Sites area and that 15.80% of this area is in good condition, but that it's not an HPI, although no rationale is provided for this conclusion. A condition assessment sheet and comprehensive species list hasn't been included so the Condition	No	Botanical species data from grassland quadrat surveys is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] . Condition assessments sheets for all applicable habitats within the Order Limits are also provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Assessment Score cannot be verified. Considering that the other neutral grassland has been categorised as being of Local ecological importance however and given the presence of lowland meadow HPI and County Wildlife Sites (CWSs) designated for the presence of lowland meadow immediately adjacent and close to the Solar PV Sites, it is deemed possible that there are areas of lowland meadow priority habitat / HPI within the Solar PV Sites site as well. If none of the other neutral grassland within the Solar PV Sites is considered to qualify as priority habitat / HPI, then a clear rationale should be provided as that is currently omitted from Chapter 9 and Volume 3, Appendix 9-1: Ecological Baseline Report.		
Wiltshire Council	Ecology and biodiversity	8.34. It is important to understand if any lowland meadow priority habitat / HPI exists on the Solar PV Sites, and if so where this habitat is located within the other neutral grassland areas. In accordance with the principles set out in Core Policy 50: Biodiversity and Geodiversity of the	No	To confirm there is no habitat which would qualify as lowland meadow with the Order Limits. Botanical species data from grassland quadrat surveys from all grassland fields is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Wiltshire Core Strategy (adopted January 2015), solar arrays / panels should not be installed on areas of priority habitat / HPI including any areas of lowland meadow present. Instead, any such areas of grassland should be retained and protected.		Lowland meadow habitat is present with two Local Wildlife Sites (LWSS) adjacent to Lime Down E.
Wiltshire Council	Ecology and biodiversity	8.35. Similarly, it is not entirely apparent from the information provided, whether areas of Field E18 may constitute calcareous grassland given the presence of species which are indicative of degraded calcareous meadow. Therefore, it is suggested that further information and clarity in this regard is provided. If calcareous grassland is present in Field E18 or any other fields on site, it is important to establish if any of these areas qualify as priority habitat / HPI. Furthermore, it is advised that solar panels should not be installed on any areas of calcareous grassland that qualify as priority habitat / HPI and instead such grassland areas should be retained, protected and enhanced if degraded.	No	The Applicant notes this comment. Botanical species data from quadrat surveys of Field E18 is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] . Given the presence of calcareous grassland indicator species, further information on whether this field meets the criteria for lowland calcareous grassland priority habitat is provided in Environmental Statement (ES) Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3] which concludes this field does not represent priority habitat.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	Hedgerows: 8.36. Appendix recognises that all the hedgerows present constitute HPI, and the council would concur with that assessment. Paragraph 3.2.59 stipulates that the majority (over 66km) of hedgerows across the Solar PV Sites were categorised as being species-rich and paragraph 3.2.63 classifies the hedgerows as being of District Importance. 8.37. Appendix 9-1 does not discuss whether any of the hedgerows qualify as 'important hedgerow' under the Hedgerow Regulations 1997. Nonetheless, it is expected that there will be substantial extents of hedgerow across the Solar PV Sites that meet the criteria of 'important hedgerow' as set out in the regulations. A rationale has not been included within Appendix 9-1 (or Chapter 9) detailing why there has been no assessment as to whether hedgerow on site comprise 'important hedgerow'. If the reason for	Yes	The Applicant notes this comment. A plan showing all hedgerows within the Order Limits deemed to qualify as Important or otherwise under the Hedgerow Regulations is provided in DCO Volume 2, TPO and Hedgerow Plan [EN010168/APP/2.11]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		omission of this evaluation and because it would have been too labour, time and cost intensive to conduct dedicated survey of all the hedgerow present across the Solar PV Sites given that the proposal is for most hedgerow to be retained and protected by a 15m buffer zone, then this should be stipulated in the appendix for completeness and transparency.		
Wiltshire Council	Ecology and biodiversity	Watercourses: 8.38. Under the Watercourse heading in Table 9-7 in Chapter 9, the priority habitat river and other rivers and streams categories have been assigned an Ecological Importance of District, however, in the Rationale column it specifies that these habitats are of Local Importance. This discrepancy should be rectified.	Yes	The Applicant notes this comment. These habitats have been assigned an Ecological Importance of District within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]
Wiltshire Council	Ecology and biodiversity	Protected and notable species: 8.39. There are a few general observations and comments regarding matters detailed in the Baseline Conditions section of Chapter 9 that have been set out below	No	Baseline habitat surveys within the Cable Route Corridor have now been undertaken, the findings of which are provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		before the discussions under the respective sub-headings for various species / species groups. 8.40. In the council's Ecology and Biodiversity Officer's view, the title of Table 9-8 should only refer to the Solar PV Sites and not the 'Scheme' as, at present, no species-specific surveys have yet been undertaken in the CRSC and only a desk study has been undertaken in respect of the CRSC. The current title of Table 9-8 infers that a suitably informed assessment has been possible for the entire Scheme which is not yet the case. This should be updated for the ES once the surveys have been undertaken. .41. It is suggested that the use of the term 'legislative protection' is inaccurate against invasive non-native species (INNS) in Table 9-9. It is suggested that instead it should just read 'legislation' or 'legislative context' given that no legal protection is afforded to INNS.		The term 'legislative protection' when referring to INNS has been removed.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	Bats: 8.42. Appendix 9-3 explains that buildings on site were subject to inspection for roosting bats and potential roosting features (PRFs) but that as all buildings are expected to be retained and unaffected by the proposed development, no further detailed surveys to establish the presence or likely absence of roosts within the buildings has been undertaken. 8.43. Even though buildings are likely to be retained within the Scheme layout, depending on where site compounds, sub-stations and so forth are to be sited (some of which is not yet confirmed), there could be indirect disturbance to any bats using the buildings as roost sites during the construction phase. As such, further survey of buildings with identified PRFs would have served to inform the layout of the Scheme in terms of ascertaining where infrastructure, BESS sites, compounds and	No	It is noted that no detailed bat roost surveys have been conducted on buildings. During a meeting with Wiltshire Council representatives on 04.03.2025, it was agreed that as undeveloped buffers from all buildings with Potential Roost Features (PRFs) will be implemented, no further detailed survey for buildings would be necessary.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		so forth should be sited to minimise the potential for impacts on bats.		
Wiltshire Council	Ecology and biodiversity	8.44. Table 9-8 in Chapter 9 assesses the importance of protected and notable species present or potentially present within the Scheme. In terms of roosting bats, Table 9-8 specifies there are a large number of trees and a small number of buildings that afford potential to support roosting bats and stipulates that specific survey to ascertain the presence or likely absence of bat roosts has not taken place. Table 9-8 assigns an ecological importance of Local (Assemblage) to roosting bats. It is unclear how this conclusion has been reached given that the preliminary roost assessment undertaken identified a large number of trees with PRFs and the presence of several buildings with potential to support roosting bats and in light of absence of further targeted survey. It is deemed that the assessment has potentially undervalued roosting bats in terms of the Solar PV Sites and as further survey of the trees with PRFs and buildings	Yes	Ground-based inspections of all buildings and trees within the Order Limits has identified abundant suitable roosting habitat, and in the absence of detailed survey data to confirm presence/likely absence of roosting bats within suitable features, roosting bats within the Order Limits are considered to be of District Importance. This has been elevated from the evaluation of Local Importance at Preliminary Environmental Information Report (PEIR) stage applying the precautionary principle.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		with bat roosting suitability was not undertaken, the precautionary principle should be applied.		
Wiltshire Council	Ecology and biodiversity	8.45. In addition, the title of Table 9-8 refers to the 'Scheme' and so if this is intended to encompass the CRSC, the possibility that roosts (including unidentified roosts of Annex II species) could be located with this area should be considered in the assessment, particularly given the proximity of roosts associated with the BBOA Bats SAC. This has not been discussed in Table 9-8. If the intention were that Table 9-8 does not attempt to assess the importance of roosting bats within the CRSC, which is advocated given the lack of survey conducted in the CRSC to date, then it is considered that this should have been clearer that the assessment presented therein pertains solely to the Solar PV Sites at this stage rather than the whole Scheme.	No	Comment noted.
Wiltshire Council	Ecology and biodiversity	8.46. In respect of discussion in Appendix 9-3 about the most suitable foraging and commuting habitat for bats, paragraph 1.2.12 recognises that permanent	No	The Applicant notes this comment. References to potential grazing at the operational scheme within the Preliminary Environmental Information Report (PEIR)

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		grassland utilised for cattle grazing or hay / silage cutting, provides suitable foraging habitat for bats, particularly greater horseshoe and lesser horseshoe bats. The appendix goes on to specify, however, that grassland habitats will be retained within the development proposals and enhanced where practicable, and that management practices i.e. grazing or cutting will be finalised within the Outline LEMP for the Scheme. This assumption is incorrect because whilst grassland habitats will be retained, grassland that comprises permanent pasture will not continue to be grazed during the construction phase and may not be grazed during the operational phase either and should have been assessed on this basis. This is due to the stipulation in Volume 1, Chapter 3 (The Scheme), under the heading of 'Grazing' that: <i>"For the purposes of assessment and reporting of effects, it is assumed that vegetation will be managed with machinery and there will be no grazing at the Solar PV Sites during the operation and maintenance</i>		Chapter 9 were only made on the basis that grassland habitats which develop under panels can be beneficial for a range of wildlife species compared to existing arable habitat, and that these benefits can be achieved through management via cutting <i>or grazing</i>, and does not depend on which management option is adopted. No firm assumption that the operational site will be managed via grazing to any extent is made within the Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The applicant disagrees with the statement that 'it should be assumed for the purposes of the ES [EN010168/APP/6.1], that bats would not forage over grassland in the Solar PV Sites'. There is emerging evidence (with limitations) that bats show reduced activity over fields with solar panels in them, but these studies do not conclude that bats do not forage over solar panels. For the purpose of assessment of impacts in ES Volume 1, Chapter 9:

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		<i>phase...However, should consent be granted, grazing by sheep will be explored, noting that there are no known landowner restrictive covenants or other reasons that would prevent such use."</i> 8.47. Therefore, the ecological assessment in Chapter 9 of the PEIR and the subsequent ES should be undertaken on the assumption that there will not be grazing at the Solar PV Sites during the operation and maintenance phase and that there will be loss of permanent grassland / grazed pasture as a foraging resource for bats particularly as grazing by cattle, rather than sheep, provides the greatest value due to the associated invertebrate assemblage it encourages. Retention of grassland that is not grazed would not be of equal foraging value for horseshoe bats. In addition, there is emerging evidence (notwithstanding limitations of associated studies) to suggest that bats avoid foraging over solar panels. As such, regardless of the retention of grassland beneath the panels, the		Ecology and Biodiversity [EN010168/APP/6.1], it has been assumed that bat activity over panels would be reduced and reference has been made to the emerging evidence on this topic. The applicant believes the Precautionary Principle has been applied appropriately in this case.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		precautionary principle should be applied and it should be assumed for the purposes of the ES, that bats would not forage over grassland in the Solar PV Sites.		
Wiltshire Council	Ecology and biodiversity	8.48. Paragraph 1.2.12 states: <i>"Consequently, the combined Sites as a whole were considered to represent habitat of 'Low to Moderate' suitability for foraging and commuting bats in accordance with the BCT guidance."</i> Presumably this was assessed in accordance with Table 4.1 of the 3rd edition of the Bat Conservation Trust (BCT) Bat Survey Guidelines (2015) given that the survey methodology has followed that edition rather than the 4th edition published in September 2023. Assuming so, it is the council's Ecology and Biodiversity Officer's view, that the conclusion of low to moderate suitability potentially comprises an underestimation of the suitability of the habitats across sites. Whilst there are not significant areas of woodland across and adjacent to the Solar PV Sites which would increase the suitability, favourable commuting and	Yes	The rationale for the survey scope chosen is provided in Environmental Statement (ES) Volume 3, Appendix 9-3: Bat Survey Report [EN010168/APP/6.3]. The assessment of habitat and survey methodology was in accordance with the 3rd edition of the Bat Conservation Trust (BCT) Bat Survey Guidelines (2015) to ensure consistency in comparable data, as surveys had already commenced prior to the 4th edition being published. However, both the 3rd and 4th edition contain almost identical guidance for assessing the potential suitability of sites for bats. Although the majority of habitats at the Order Limits, namely monoculture arable fields, represent low suitability habitat for bats, based on the precautionary principle and to reflect the value of more diverse habitats and connective boundary features, the Order Limits as a whole were

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		foraging habitat for bats is present across the sites including Gauze Brook and other watercourses and associated riparian corridors, areas of permanent pasture and extensive well-established / mature species-rich hedgerows with trees that have functional connectivity with suitable habitats in the wider landscape. As such, it is suggested that the Solar PV Sites as a whole afford at least moderate suitability for foraging and commuting bats rather than low to moderate.		considered to represent habitat of 'Moderate' suitability for foraging and commuting bats in accordance with both editions of BCT guidance. This is detailed in section 1.3 of ES Volume 2 Appendix 9-3: Bat Survey Report [EN010168/APP/6.3]
Wiltshire Council	Ecology and biodiversity	8.49. Bat activity surveys were conducted at the Solar PV Sites. Appendix 9-3 sets out a rationale for why manual transect surveys were not undertaken in conjunction with static detector surveys in accordance with BCT guidelines. It sets out that this approach to survey was considered appropriate given the relative homogeneity of the habitats within the Survey Area and wider landscape and on account of the likely retention of the best foraging and commuting habitat. The last justification put forward is the cost of undertaking manual	No	The rationale for the survey scope chosen is provided in Environmental Statement (ES) Volume 3, Appendix 9-3: Bat Survey Report [EN010168/APP/6.3] . The survey scope for bat activity surveys at the Solar PV Sites was agreed with Natural England via email on 12.07.2024

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		activity surveys, and Appendix 9-3 specifies that to be precautionary, the level of static detector survey carried out was for that of 'high' suitability habitats (according to BCT guidelines) in lieu of walked transects. 8.50. The rationale explaining why manual activity transect surveys were not conducted is understood and there is validity to these arguments. Nonetheless, the council would highlight the presence of mature species-rich hedgerows, especially those adjoining woodlands, and watercourses / riparian corridors and areas of permanent pasture across the Solar PV Sites and reiterate that there will effectively be loss of permanent pasture as a foraging resource for horseshoe bats and so this optimal foraging habitat will not be retained. Given the scale of the proposed Scheme and the potential for impacts on bat activity and behaviour across the sites, it is the council's Ecology and Biodiversity Officer's view that it would have been preferable for some walked transect surveys to have at		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		least been conducted in the most suitable habitats. This would collate data and visual observations regarding bat behaviour and activity at the site and to augment the static detector surveys.		
Wiltshire Council	Ecology and biodiversity	8.51. Appendix 9-3 details that two extra detectors were deployed in the additional substantial area of 44 ha added in June 2024. It's apparent that 28 static detectors were deployed in total across the Solar PV Sites. Given the substantial land area covered by the Solar PV Sites, it should be noted that even deployment of that number of detectors could have left areas of suitable bat habitat unsampled.	No	The rationale for the survey scope chosen is provided in Environmental Statement (ES) Volume 3, Appendix 9-3: Bat Survey Report [EN010168/APP/6.3] . The survey scope for bat activity surveys at the Solar PV Sites was agreed with Natural England via email on 12.07.2024
Wiltshire Council	Ecology and biodiversity	8.52. It's noted that survey of the additional land at Lime Down added in June 2024 has not yet been conducted in the months of April to June and that survey of this area is provisionally scheduled for April to June 2025. Ideally, the council and other interested parties would be re-consulted subsequent to completion of these survey visits.	No	Applicant notes this comment. Complete ecological survey information for this area was issued to Wiltshire Council on 26 August 2025.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	8.53. The discussion under the headings of Cable Route Search Corridor and Designated Sites mentions two bat consultation zones and it's also mentioned in paragraph 1.4.14. However, there are some omissions which were touched on earlier in this response. Firstly, there are more than two bat consultation zones that coincide with the CRSC. Secondly, the discussion presented in Appendix 9-3 does not fully identify the importance of these zones which includes zones around component areas of the BBOA Bats SAC itself, whilst three others are around Bechstein's bats 'core roosts' that are considered to be demographically and functionally linked to the BBOA Bats SAC in the absence of evidence to the contrary. Paragraph 1.4.14 does make reference to qualifying bat species but doesn't explicitly specify that these comprise qualifying species of the BBOA Bats SAC. It is suggested that the applicant and their consultant ecologist refer to the Scoping Opinion and Technical Briefing Note	Yes	The Applicant notes this comment. Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] expands on this point and provides clarification on what the consultation zones constitute.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		provided by the council for more information on this matter and HRA implications. 8.54. In the absence of survey data for the CRSC, the precautionary principle should be applied when considering the habitat suitability for foraging / commuting bats especially as consultation zones associated with the BBOA Bats SAC coincide with the CRSC.		
Wiltshire Council	Ecology and biodiversity	Breeding Birds: 8.55. Volume 3, Appendix 9-4: Breeding Bird Survey Report states that: <i>"Six breeding bird surveys have been carried out at Lime Down A-E and Land near Melksham Substation between June 2023 and June 2024. Surveys followed good practice guidelines (Ref 9-4-1). Surveys of additional land at Lime Down C added to the Solar PV Sites in June 2024 are scheduled for April to June 2025."</i> The report goes on to state: <i>"Surveys were carried out over two survey seasons, with two visits at Survey Zones 1-12 and Land</i>	No	The Applicant notes this comment. Environmental Statement (ES) Volume 3, Appendix 9-4: Breeding Bird Survey Report EN010168/APP/6.3] provides further clarification on the limitations of the breeding bird survey and the implications on the robustness of the assessment, but these are concluded to have no significant limitations on the assessment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		<i>near Melksham Substation occurring between June and July 2023, and a further four visits between April and May 2024. All six visits of Survey Zone 13 were undertaken during a single season between April and June 2024 (Table 9-4-1 refers)."</i> 8.56. The council makes a couple of observations regarding the survey methodology. Firstly, it's not evident why surveys in 2024 didn't start until 10-12th April. This is a relatively late start to the survey, especially given that breeding bird surveys can commence in late March and generally commence by early April. If this was due to poor weather or some other factor it would be prudent for this to be explained in the report.		
Wiltshire Council	Ecology and biodiversity	8.57. Furthermore, apart from Survey Zone 13, it appears all other areas were subject to survey visits that were split over two survey seasons i.e. two consecutive years. Whilst it is appreciated that there may have been limited control over when surveys were instructed in 2023, it is not apparent	No	The Applicant notes this comment. Environmental Statement (ES) Volume 3, Appendix 9-4: Breeding Bird Survey Report EN010168/APP/6.3] provides further clarification on the limitations of the breeding bird survey and the implications on the robustness of the assessment, but

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		why the decision was taken not to conduct a full season's worth of survey at those sites surveyed in 2024 and to instead only conduct survey visits in April and May of 2024 at those survey zones where survey visits had been conducted in June and July in 2023. As a result of employing this approach to survey, most survey zones haven't been subject to a complete season's worth of survey visits. It would have been preferable for a full suite of survey visits to have been conducted in 2024 even though June and July visits were undertaken in 2023, in order to have provided a complete dataset for 2024. Splitting the survey across two years doesn't provide such robust data regarding number of breeding birds and territories.		these are concluded to have no significant limitations on the assessment.
Wiltshire Council	Ecology and biodiversity	8.58. In addition, no rationale is provided in Appendix 9-4 as to why a full season's worth of visits was not conducted in 2024 to ensure collation of a complete and robust dataset. This is important given the considerable loss of habitat important to a number of bird species and displacement of	No	The Applicant notes this comment. Environmental Statement (ES) Volume 3, Appendix 9-4:Breeding Bird Survey Report EN010168/APP/6.3] provides further clarification on the limitations of the breeding bird survey and the implications on the robustness of the assessment, but

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		species, especially those that nest in open habitats and arable field margins, that the proposed Scheme is likely to cause. The Limitations section of Appendix 9-4 does explain that survey visits were completed over two years. However, it stops short of fully acknowledging the issues associated with quantifying / estimating numbers and extents of territories when the survey is split across two years and there isn't a complete dataset for any given survey year. It also omits full discussion regarding how this approach to survey draws into question the robustness of any estimations made.		these are concluded to have no significant limitations on the assessment.
Wiltshire Council	Ecology and biodiversity	8.59. Survey visits were also split across consecutive days with a single transect being surveyed across more than one day, and this is explained in paragraph 1.2.10. Although this doesn't represent optimal survey methodology, and employing this approach does comprise a limitation to degree, it is understood that this approach likely proved necessary due to the scale of the Solar PV Sites and the large areas that each surveyor would have covered on foot	No	The Applicant notes this comment. Environmental Statement (ES) Volume 3, Appendix 9-4:Breeding Bird Survey Report EN010168/APP/6.3] provides further clarification on the limitations of the breeding bird survey and the implications on the robustness of the assessment, but these are concluded to have no significant limitations on the assessment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		before the survey cut-off time each morning.		
Wiltshire Council	Ecology and biodiversity	8.60. Appendix 9-4 states in paragraphs 1.3.53 – 1.3.54: <i>“The estimated minimum total number of skylark territories within the Sites was 167...The greatest number of skylark territories were recorded at Lime Down C, the largest of the five Sites, although the density per hectare was among the lowest (0.16/ha). The large open fields at Lime Down C represent ideal nesting habitat for the species; Field C10 in particular appeared to be of particular importance for the species, supporting 20% of the total skylark territories at the Site.”</i> It is recommended that those fields which have the greatest number of skylark territories, such as Field C10, are not subject to installation of solar panels but are instead retained and protected in accordance with the mitigation hierarchy.	No	The Applicant notes this comment. Environmental Statement (ES) Volume 3, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] includes an assessment of the impact of the Scheme on birds (including skylark) and sets out how mitigation will reduce significant effects, including how the design of the Scheme has included provision of entire fields designated as set-aside to provide suitable habitat for ground nesting birds (particularly skylark) for the lifetime of the Scheme. These areas are shown in ES Volume 2, Figure 3.4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] and include Field C10.
Wiltshire Council	Ecology and biodiversity	Great Crested Newts: 8.61. In respect of survey undertaken to date, Volume 3, Appendix 9-5: Great	No	The applicant notes this comment. A detailed assessment of impacts in relation to great crested newts is provided within Environmental Statement (ES)

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Crested Newt Survey Report specifies: <i>"eDNA surveys have been carried out on accessible waterbodies within the Solar PV Sites and Land near Melksham Substation, and within the 250m buffer surrounding the Sites between April 2023 and June 2024."</i> 8.62. The report states: <i>"259 ponds identified during the desk-based assessment have not yet been accessed for survey, between April 2023 and June 2024, including a large number associated with the Cable Route Search Corridor. District Level Licensing (DLL) for GCN is currently being explored as a potential compensation option for the Scheme, which does not require survey data to be collected. The proposal for GCN eDNA mitigation, compensation and scope of further eDNA surveys is therefore still to be confirmed...Where access has not been possible to date on further ponds on third-party land within 250m of the Scheme Boundary and within the Cable Route Search Corridor, attempts will be made to</i>		Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. This is supported by baseline ecological information collected from great crested newt surveys which are presented in ES Volume 3, Appendix 9-5: Great Crested Newt Survey Report [EN010168/APP/6.3]. It is recognised this information was not available at Preliminary Environmental Information Report (PEIR) Stage. It is intended for the Scheme to be registered under the DLL scheme as part of the mitigation package.

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		<i>secure access for survey in the 2025 season."</i> 8.63. The report doesn't clearly stipulate how many ponds are yet to be surveyed around the Solar PV Sites. As such, it is recommended that clarity is provided in the report and to the council to make it clear exactly what survey is outstanding and where. Also, it is queried whether it has now been determined whether the DLL route will be used or will surveys be conducted in 2025; or whether there will be a combination of the two approaches, such as surveys of the remaining ponds around the Solar PV Sites and use of DLL for the CRSC. 8.64. Given the amount of outstanding survey and gaps in the ecological baseline information in respect of great crested newts, and that a suitably informed and comprehensive mitigation strategy has not yet been formulated for the species, comment cannot be provided at this stage		

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		regarding whether proposed mitigation and compensation at the site is adequate and likely to be effective.		
Wiltshire Council	Ecology and biodiversity	Otter and Water Vole: 8.65. Volume 3, Appendix 9-6: Otter and Water Vole Survey Report explains that no field surveys for these riparian mammals have been conducted in the CRSC to date. Chapter 9 stipulates that in terms of water vole and otter surveys at the additional land at Lime Down C included within the Scheme boundary in June 2024, a spring survey is scheduled for April / May 2025. It is therefore, recommended that a further supplementary consultation is undertaken subsequent to completion of this survey.	No	The Applicant notes this comment. Complete survey information pertaining to water voles and otters was issued to Wiltshire Council on 26 August 2025.
Wiltshire Council	Ecology and biodiversity	8.66. Evidence of otter and water vole presence has been found within Lime Down D and otter field signs have also been identified in Lime Down E and both species have been assigned an ecological importance of Local in Chapter 9. However, dormouse, for which presence has been assumed due to no dedicated survey being	Yes	Rationale for how the ecological importance valuations have been derived is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3] . The Applicant concurs that water vole and otter

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		undertaken, has been assumed to be of higher District level importance. The approach and application of the precautionary principle in respect of dormice in the absence of survey data is welcomed, however, both otter and dormouse are European Protected Species (EPS), and all three species are Species of Importance (SPI), and survey has confirmed presence of otter and water vole. The associated rationales for how the ecological importance valuations for otter and water vole have been derived don't robustly justify the disparity in the approach to these species compared to how dormouse has been assessed. It is suggested that this is re-evaluated, and consideration be given to otter and water vole likewise being assessed as District level importance. Moreover, the survey identified presence of American mink at Lime Down E which serves to indicate how under threat water vole are in this locality and therefore, the importance of the population at Lime Down D. It is worth		are assessed as District level importance on account of the protection afforded to these species, and the level of rarity of water voles in the locality and declines in numbers nationally.

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		highlighting that water vole is the country's fastest declining mammal.		
Wiltshire Council	Ecology and biodiversity	Wintering Birds: 8.67. Chapter 9 (Ecology and Biodiversity) sets out that wintering bird surveys are still ongoing at additional land at Lime Down C and D added in February 2024 and additional land at Lime Down C added in June 2024. Surveys are due to finish in February 2025. It is therefore recommended that a supplementary consultation is undertaken once the outstanding surveys are complete and an appropriate mitigation strategy has been devised, if appropriate.	No	The Applicant notes this comment. Complete ecological survey information for this area was issued to Wiltshire Council on 26 August 2025.
Wiltshire Council	Ecology and biodiversity	White-Clawed Crayfish: 8.68. In respect of the assessment of white-clawed crayfish in Chapter 9, although no specific survey has been undertaken, in light of the data search yielding records within watercourses in the surrounding landscape and the existence of suitable habitat for the species at Gauze Brook,	No	The Applicant notes this comment. Rationale for how the ecological importance valuations have been derived is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Gabriel's Well and connecting ditches, it has been assumed that the species is present within these features. This approach and application of the precautionary principle is welcomed. However, as it is being assumed that white-clawed crayfish is present, assigning an ecological importance of greater than 'Local (assumed)' may need to be considered given that the species is in decline and under threat.		
Wiltshire Council	Ecology and biodiversity	Embedded Mitigation Measures: 8.69. Section 9.9 titled 'Embedded Mitigation Measures' states under the sub-heading of 'Construction': <i>"The Scheme has been designed to retain the most valuable habitats and protect these with undeveloped buffer zones at the Solar PV Sites during construction and decommissioning and through the operation of the Scheme. These are shown on the Indicative Masterplan in Volume 2, Figures 8.15.1 to 8.15.5. Similarly, habitats with particular importance for protected / notable</i>	No	The Applicant notes this comment. To confirm there is no habitat which would qualify as lowland meadow with the Order Limits. Botanical species data from grassland quadrat surveys from all grassland fields is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		<i>species, even if the habitats are of low importance in themselves, will be retained outside the Development Area, where appropriate, to avoid impacts."</i> 8.70. The use of these embedded mitigation measures is supported, however, as detailed earlier, it's not entirely apparent whether any grassland habitat of intrinsic value (lowland meadow and calcareous grassland) could be present within the Solar PV Sites and if so, whether these areas will be retained and protected or whether solar panels will be installed on any such areas, if present with the areas currently mapped as other neutral grassland. The applicant should provide further information and clarity in this regard. Also, any areas of permanent pasture which may be a foraging resource for horseshoe bats will be lost.		
Wiltshire Council	Ecology and biodiversity	8.71. Since the Scoping stage, Chalkenhams Local Wildlife Site (LWS) and Brickyard Scrub LWS, which were formerly included within Lime Down E, have been	No	The Applicant notes this comment. To confirm there is no habitat which would qualify as grassland priority habitat with the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		removed from the Scheme Boundary due to these sites comprising species-rich lowland meadow habitat and this is advocated. It is advised that if any areas of intrinsic botanical value, which could qualify as grassland priority habitat, do exist within the Solar PV Sites, these areas should also be retained and remain undeveloped.		Order Limits. Botanical species data from grassland quadrat surveys from all grassland fields is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] .
Wiltshire Council	Ecology and biodiversity	8.72. In terms of Operation, paragraph 9.9.20 of Chapter 9 specifies: <i>“Grassland habitats under operational arrays will be either managed through grazing or cutting. The proportion of grazing and cutting will be balanced to maximise the ecological benefits which can arise from a sensitively-timed cutting regime.”</i> Nonetheless, as aforementioned, Chapter 3 (The Scheme) of the PEIR indicates that for the purposes of the assessment it should be assumed the site won’t be grazed. As such, paragraph 9.9.20 and the remainder of the ecological assessment presented in Chapter 9 should be amended accordingly and the assessment adjusted as necessary given that impacts, and the efficacy of	No	Comment noted. The assessment of ecological impacts presented within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] assumes the operational management of grassland within the Solar PV Sites will be via cutting.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		mitigation and compensation measures detailed therein have been assessed on the basis that the Solar PV Sites may be grazed.		
Wiltshire Council	Ecology and biodiversity	8.73. Chapter 9 details proposed buffer widths to be implemented from different habitats and features, and states that these buffers will not contain any array structures, hard standing or electrical hardware, with the exception of where new access and cables need to cross existing field boundary habitats. It should be specified that access tracks cannot run the length of buffers. Also, there must be no encroachment of compounds or welfare units into the buffers, or storage of materials, equipment or machinery within the buffers; they should remain free of development and associated activities.	No	Comment noted. All proposed ecological buffers are set out within Environmental Statement (ES) Volume 2, Appendix 9-8: Schedule of Protective Ecological Buffers [EN010168/APP/6.3] . There are a small number of locations where the buffers are encroached for practical reasons, for example to take advantage of existing farm tracks already lying within buffers. Such instances are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]
Wiltshire Council	Ecology and biodiversity	8.74. In addition, it should be stipulated that where the habitat to be buffered is a boundary habitat, the buffer zone should extend from the edge of the habitat to the perimeter fence rather than to the solar panels / arrays or any other structure /	No	The Applicant notes this comment. All specified design buffers and offsets as set out in Environmental Statement (ES) Volume 2, Appendix 9-8: Schedule of Protective Ecological Buffers [EN010168/APP/6.3] are between the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		infrastructure. Likewise, the 15m buffer to woodland must be between the edge of the woodland and the perimeter fencing rather than between the woodland edge and solar panels.		ecological feature specified and the perimeter fencing in all locations where perimeter fencing is required, so that perimeter fencing does not encroach into the specified buffer. Where perimeter fencing is not required, for instance at internal hedgerows, the buffer will extend to the nearest built element (i.e. panels, access or other infrastructure). ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] sets out where buffers will not be observed in a small number of locations, for instance to take advantage of existing tracks for access.
Wiltshire Council	Ecology and biodiversity	8.75. In respect of the final cable route, which hasn't yet been refined or determined, paragraphs 9.9.12 – 9.9.14 specify that it will be sited to avoid impacts on ecological features and buffers from sensitive boundary features will be observed where practicable. It then specifies that general principles are provided in Volume 3, Appendix 3.2 and that a Precautionary Method of Working will be employed which will include deployment	No	The applicant notes this comment. A detailed assessment of impacts and mitigation measures for identified impacts relating to cable route installation is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] supporting by baseline information presented in ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		of an Ecological Clerk of Works and use of horizontal directional drilling. It states: "The ecological avoidance, mitigation and compensation measures determined to be necessary for cable route installation will be detailed within a CEMP." 8.76. This approach to mitigating potential impacts associated with the cable route and the production of a suitably comprehensive CEMP is supported. Nonetheless, use of this approach and formulation of a CEMP will need to be informed and supported by an appropriate level of survey. It is also possible that further avoidance, mitigation and compensation measures will need to be devised especially given that the location and number of temporary site compounds to be constructed is not known at present and could give rise to a mechanism for effect on ecological receptors. There are likely to be other potential pathways for effect associated with the construction of the cable route that may necessitate dedicated mitigation		The Preliminary Environmental Information Report (PEIR) provides a snapshot of the Applicant's assessment at the time statutory consultation is undertaken, providing the information required for consultation bodies to develop an informed view of the likely significant environmental effects of the proposals. The Applicant considers the amount of information published during statutory consultation was sufficient and in accordance with this standard for preliminary environmental information, and that further statutory consultation is not required in relation to the refined Cable Route Corridor, this being located within the Cable Route Search Area already consulted upon.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		strategies over and above that which would be covered in the Outline CEMP due to be submitted with the DCO application. This will need to be assessed further within the ES as the cable route construction comprises a considerable element of the Scheme and should be subject to adequate assessment. As previously mentioned, the council recommends that the applicant undertake a secondary, supplementary public consultation subsequent to surveys being carried out in the CRSC.		
Wiltshire Council	Ecology and biodiversity	8.81. As discussed, Chapter 3 of the PEIR stipulates that for the purposes of assessment and reporting of effects, it is to be assumed that vegetation will be managed with machinery and there will be no grazing at the Solar PV Sites during the operation and maintenance phase. Chapter 3 does go on to specify that should consent be granted, grazing by sheep will be explored and that there are no known landowner restrictive covenants or other reasons that would prevent such use. Nevertheless, the assessment of likely	No	The Applicant notes this comment. References to potential grazing at the operational scheme within the Preliminary Environmental Information Report (PEIR) Chapter 9 were only made on the basis that grassland habitats which develop under panels can be beneficial for a range of wildlife species compared to existing arable habitat, and that these benefits can be achieved through management via cutting <i>or grazing</i> , and does not depend on which management option is adopted. No assumption that the operational site will be

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		impacts and effects in Chapter 9 appears to be based on an assumption that the Solar PV Sites will probably be subject to grazing and so assumes attainment of the benefits to ecology that a grazing regime can confer. Although Chapter 9 stipulates that management options will be set out within the LEMP, it is the council's Ecology and Biodiversity Officer's view that it doesn't sufficiently caveat the assessment to explain that the potential for grazing has yet to be confirmed. In fact, paragraph 9.9.20 indicates that the assessment of impacts on grassland habitats during operation is predicated on grazing taking place. It discusses balancing the proportion of grazing and cutting to maximise the ecological benefits and specifies that grazing methods such as pulse-grazing, aftermath grazing, and conservation grazing can be employed and that conventional grazing regimes are typically less beneficial to habitat diversification. 8.82. It is therefore recommended that the		managed via grazing to any extent is made within the Environmental Statement (ES) Volume 1, Chapter9: Ecology and Biodiversity [EN010168/APP/6.1].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		approach taken in Chapter 9 is reviewed accordingly and any necessary amendments are undertaken and carried forward to the ES to ensure that the assessment (and the discussion regarding mitigation, compensation and enhancement) hasn't relied on grazing taking place during operation contrary to the stipulation in Chapter 3 of the PEIR.		
Wiltshire Council	Ecology and biodiversity	8.83. Section 9.8 in Chapter 9, titled 'Potential Impacts', doesn't include discussion of artificial lighting / light pollution / light spill under the 'Construction' sub-heading. Lighting at construction compounds, welfare units and from the considerable number of vehicles and machinery which will present on site, particularly during the construction phase, may give rise to impacts on wildlife. It is recommended that this is taken forward in the ES.	No	The applicant notes this comment. An assessment of impacts relating to construction phase lighting on ecological features is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This concludes that lighting would not give rise to significant effects on ecology. Measures to control construction phase lighting are prescribed within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] .
Wiltshire Council	Ecology and biodiversity	8.84. In Section 9.8 titled 'Potential Impacts' in Chapter 9, under the sub-heading of 'Operation' there is no discussion of the	No	The applicant notes this comment. An assessment of impacts relating to cleaning of solar panels on ecological features is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		cleaning of the solar panels during the operational phase and the potential associated impacts. It is suggested that this maintenance activity should be included in the list and potentially under the sub-headings of 'Habitat Loss and Habitat Change', 'Killing and Injury' and 'Disturbance'. It should not be assumed that cleaning of the solar panels will have no impact on ecological receptors. This is because the use of machinery to periodically clean the solar panels may cause damage and disturbance to habitats, flora and soils around with the solar array areas, and damage could be exacerbated if the ground is water-logged or very dry. This could have a detrimental effect on the establishment of grassland habitats within the Solar PV Sites. Cleaning of the solar panels, which the PEIR stipulates will take place at night using artificial lighting, could also cause low-level disturbance to wildlife, such as nesting and roosting birds. Chapter 9 does not sufficiently assess the cleaning of the solar panels and the potential		presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. This concludes that cleaning of panels would not give rise to significant effects on ecology.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		mechanisms for effect on ecological receptors. As such, is suggested this omission is addressed in the ES.		
Wiltshire Council	Ecology and biodiversity	Designated Sites: 8.85. The assessment of the potential construction and operational phase impacts on the BBOA Bats SAC provided under the sub-heading of 'Designated Sites' in Chapter 9 (Ecology and Biodiversity) recognises that permanent pasture at the Solar PV Sites comprises important foraging habitat for horseshoe bats. Nonetheless, the assessment goes on to state: "Permanent pasture coverage at the Solar PV Sites is comparably small, accounting for approximately 60.56ha or 6.9% of the total area of covered by the Solar PV Sites." 8.86. Whilst the area of permanent pasture is relatively small when considered as a proportion of the whole Solar PV Sites area, 60.56ha is not an insubstantial area and could comprise an locally important	Yes	The applicant notes this comment. A detailed assessment of impacts relating to loss of permanent pasture on horseshoe bats is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The buffer areas at the Solar PV Sites have been designed to take account of foraging/commuting bats. A minimum offset of 15m from all hedgerows, tree lines and woodlands has been designed in to the proposals. This is in accordance with minimum offset from 'core bat habitat' for horseshoe bats, as advised and defined in Wiltshire Council's Trowbridge Bat Mitigation Strategy SPD which the Applicant refers to. Notwithstanding this assessment, a much reduced quantum of permanent pasture now remains within the Solar PV Sites, which now totals approximately 16.2 ha

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		foraging resource for bats. Therefore, the potential for adverse effects as a result of change of use of this habitat and the effective loss of this foraging resource for horseshoe bats should be appropriately assessed. Aside from reference to embedded mitigation in the form of 15m undeveloped buffer zones, there doesn't appear to be any other avoidance or mitigation measures proposed to address or offset the potential impacts that could arise as a result of the loss of permanent pasture, and in turn on the loss of foraging habitat for horseshoe bats. Moreover, emerging research and evidence is increasingly suggesting that bats are avoiding foraging over solar farm sites and so retention of grassland within the Solar PV Sites will not provide like-for-like or better compensatory habitat for horseshoe bats than the permanent pasture that will be lost. Bat activity across and in the vicinity of the solar park decrease further if artificial light were to spill onto / illuminate retained field boundary habitats of value to bats.		following changes to the Order Limits subsequent to Preliminary Environmental Information Report (PEIR) stage.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		8.87. It is therefore suggested that the areas of permanent pasture on the Solar PV Sites should be retained as far as reasonably practicable, especially given that contrary to the supposition in Chapter 9 (Ecology and Biodiversity), Chapter 3 (The Scheme) indicates that there may not be grazing on the site during the operational phase and that if this is implemented, it would likely comprise sheep grazing rather than cattle grazing.		
Wiltshire Council	Ecology and biodiversity	8.88. The assessment in respect of BBOA Bats SAC acknowledges that bat surveys are ongoing and that insufficient information is currently available to fully evaluate the scope and significance of any potential impacts on the SAC. It assumes a reasonable worst-case scenario and concludes there could be a significant adverse impact on the integrity of the SAC. This precautionary approach to the assessment is welcomed and advocated given the current absence of any survey information for the additional land at Lime	No	The Applicant notes this comment. A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC including Bechstein's Bat roosts. A full assessment of potential impacts of the Scheme on bats is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Down C and the CRSC. However, the assessment seems to focus on loss of foraging habitat and doesn't consider that there could be unidentified Bechstein's roosts within the CRSC especially given the proximity of the recently identified Bechstein's bat maternity roosts south of Chippenham which we provided a Technical Briefing Note regarding in the autumn.		
Wiltshire Council	Ecology and biodiversity	8.89. The assessment presented in Chapter 9 of impacts on the BBOA Bats SAC during construction and operation concludes that the assessment will be updated once full survey information has been collected and analysed and that a full assessment of effects will be detailed within the ES, including the proposed mitigation package to manage the full extent of impacts identified, and assessment on whether the Scheme will have a likely significant effect upon the SAC which will be provided in the HRA report that will accompany the DCO application.	No	Complete survey information pertaining to bats was issued to Wiltshire Council on 26 August 2025. A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC, which gives full consideration to identified Core Roosts as well as component sites.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		8.90. Therefore, it is recommended that a secondary, supplementary consultation is undertaken by the applicant once comprehensive survey data has been collated. It is also advised that the HRA should give full consideration to not just the SAC component sites and qualifying species but also to core roosts which are known and / or considered to be functionally and demographically linked to the SAC.		
Wiltshire Council	Ecology and biodiversity	Sites of Special Scientific Interest (SSSIs): 8.91. In terms of the assessment of impacts on Harries Ground, Rodbourne Site of Special Scientific Interest (SSSI) which lies immediately adjacent to Lime Down D, Chapter 9 (Ecology and Biodiversity) outlines 'Enhancement Measures' and states that prescriptions for the creation and management of all grassland within the Scheme (under panels and in buffer / ecological mitigation zones) would be set out within the final LEMP and that the general objective would be to generate a	No	The Applicant notes this comment. A Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and Completed Metric [EN010168/APP/7.9] has been submitted with the Development Consent Order (DCO) application setting out proposed habitat types and conditions. This is accompanied by an Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] which sets out how the habitats will be secured and maintained/managed for the lifespan of the Scheme along with a comprehensive ecological monitoring schedule. A

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		simple mosaic of grassland habitats through the adoption of a number of different habitat management types. It states that grassland management objectives may range from conservation-grazed pasture, to tussocky grassland, flowering meadow and ruderal-mix grassland. In addition, paragraph 9.10.62 refers to the creation of areas of species-rich grassland within the Solar PV Sites. 8.92. Although these aspirations are welcomed, as already discussed, the assessment should assume there will be no grazing during operation (as dictated in Chapter 3) and as such, the assessment and proposed measures in Chapter 9 are not entirely correct or reflective of the Scheme proposals put forward by the applicant. Also, whilst it may be possible to provide some areas of species-rich grassland, this cannot be guaranteed. Thus, in terms of projections of the type, quality and diversity of grasslands that will be achievable under the solar panels,		Requirement in the Draft DCO [EN010168/APP/3.1] secures the provision of BNG as part of the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Wiltshire Council are applying the precautionary principle and taking a risk-based view in line with the approach also being taken by other Local Planning Authorities and are assuming that only modified grassland would be delivered under the solar panels. Without knowing the exact details of how the grassland will be managed the council does not have assurance that anything better than modified grassland would be achieved under and around the solar panels. Furthermore, as NSIPs are not currently subject to statutory biodiversity net gain (BNG), details of appropriate habitat creation, enhancement and management measures cannot be secured by means of the BNG route and a Habitat Management and Monitoring Plan (HMMP) and biodiversity gain plan (BGP). Instead, the detailed LEMP will be an important document.		
Wiltshire Council	Ecology and biodiversity	Assessment of Impacts on Habitats: Arable Field Margins:	No	Comment noted.

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		8.94. In terms of assessment of operational phase impacts on arable field margins, Chapter 9 (Ecology and Biodiversity) specifies that the value of these marginal areas will be maximised for biodiversity through favourable cutting / grazing regimes. The applicant is advised to cross-refer to earlier comments regarding grazing during operation and take this into account in the ES accordingly.		
Wiltshire Council	Ecology and biodiversity	Other Neutral Grassland: 8.95. In respect of construction phase impacts on other neutral grassland, Chapter 9 states that although some areas of this grassland may be lost during the construction phase, the Scheme will be designed to ensure that the most valuable habitats are retained and protected. It then specifies that a BNG Assessment (taking account of habitat trading rules and ensuring that a minimum 10% net gain for biodiversity is achieved) will ensure that any losses of other neutral grassland are fully	No	The Applicant notes this comment. Botanical species data from grassland quadrat surveys is provided within the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]

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		compensated for through the creation of new areas of this habitat type and enhancement of retained areas over lifetime of Scheme. It states that it will be designed to ensure no net loss of other neutral grassland across the entirety of the Scheme. It concludes that any losses are considered likely to be minor and that there will be no significant adverse effects on extent or quality of this grassland habitat during construction. 8.96. Although Chapter 9 stipulates that the most valuable habitats will be retained and protected and this is advocated, as discussed earlier, it hasn't been clearly specified within the main body of the report whether there are any areas of other neutral grassland that may comprise lowland meadow or calcareous grassland. It is acknowledged that Table 9-7 in Chapter 9 states that the grassland on site is not priority habitat / HPI. However, a robust rationale is not provided and given the number and assemblage of species listed in		

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		the reporting against some areas and in the absence of a comprehensive botanical list (which ordinarily would be included within the Ecological Baseline Report), the council's Ecology and Biodiversity Officer cannot corroborate the conclusion presented in Table 9-7 regarding the importance and priority habitat status of the more botanically diverse areas of other neutral grassland within the Solar PV Sites. As previously indicated, solar panels should not be installed in any areas of grassland that qualify as priority habitat / HPI.		
Wiltshire Council	Ecology and biodiversity	8.97. In terms of operational phase impacts, Chapter 9 concludes no significant adverse effects on other neutral grassland and that the Scheme will support habitats of higher biodiversity value during the operation and maintenance phase than at baseline. Whilst it is agreed that this is likely to be the case when considering the Solar PV Sites in their entirety, any areas of other neutral grassland that are already of moderate botanical interest could decline in diversity and condition if solar panels were to be	No	The Applicant notes this comments. As set out in the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] , all proposed grassland beneath Solar PV Panels will assumed to represent modified grassland, and can be expected to achieve 'poor' condition on a precautionary basis.

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		installed them. Moreover, as aforementioned, application of the precautionary principle means the council has to assume that beneath the solar panels, grassland of no greater value than modified grassland will be attained. As such, the council must appraise the proposed solar park on this basis. Also, as already detailed, grazing should not have been assumed as a possibility in the assessment.		
Wiltshire Council	Ecology and biodiversity	Assessment of Impacts on Species: Roosting Bats – Construction Phase Impacts: 8.98. Chapter 9 states that insufficient information is currently available to fully assess potential impacts on roosting bats associated with the loss of trees or buildings, as well as through the potential isolation of roosts through the fragmentation of key connecting habitats within the CRSC. The precautionary approach taken in the assessment of	No	The applicant notes this comment. An assessment of impacts relating to construction phase impacts (including cable route installation) on roosting bats is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This is also specifically considered with reference to bats of the BBOA Bats SAC within the Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10]

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		impacts on roosting bats is advocated and the council concurs with that conclusion. It is suggested however, that reference to the BBOA Bats SAC and functionally linked core roosts and habitat and the potential for unidentified roosts of SAC qualifying species to be present in the Scheme, particularly the CRSC, should be mentioned in the assessment.		
Wiltshire Council	Ecology and biodiversity	8.99. Chapter 9 discusses the potential for artificial lighting at night to impact bat activity and roosting bats and this is corroborated. The assessment does not, however, consider that site compounds, welfare units etc. in place during the construction phase will utilise security lighting at night during the summer months as well as the winter months, and that this could have an adverse impact on roosting bats. As a result, Chapter 9 also omits discussion regarding additional mitigation measures during construction phase to address the potential for the aforementioned impact and it is recommended this is addressed in the ES.	No	The applicant notes this comment. An assessment of impacts relating to construction phase lighting on ecological features (including bats) is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This concludes that lighting would not give rise to significant effects on bats.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	Foraging / Commuting Bats – Construction Phase Impacts: 8.100. In terms of the potential for effects in the CRSC, Chapter 9 specifies this will be fully assessed within the ES chapter once a refined CRC is available and an assessment of habitats and features within the CRS for bats has been completed. This is deemed to be the correct approach but the council's Ecology and Biodiversity Officer would suggest that reference to the potential for impacts on habitat used by qualifying species of the BBOA Bats SAC and of the need for HRA is included in this section of the assessment going forward. This is on account of the potential for effects on bat habitat within consultation zones around BBOA Bats SAC component areas and within core areas around core roosts functionally linked to the SAC given that the CRSC coincides with these zones.	No	The Applicant notes this comment. A Habitats Regulations Assessment (HRA) Report [EN010168/APP/7.10] has been completed for the Scheme, considering potential impacts on the Bath and Bradford on Avon Bats SAC A full assessment of potential impacts of the Scheme on bats is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].
Wiltshire Council	Ecology and biodiversity	8.101. Chapter 9 specifies that the removal of grassland fields within the Solar PV Sites during construction will result in temporary	Yes	The applicant notes this comment. A detailed assessment of impacts relating to loss of permanent pasture on horseshoe

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		reduction in available foraging habitat of low suitability which is likely to reduce the availability of invertebrate prey for foraging bats in the short-term. It assesses that the loss of sub-optimal habitat is non-significant. It is deemed that this assessment neglects to wholly consider the impacts associated with loss of permanent pasture which is a foraging resource for horseshoe bats, which are Annex II qualifying species of the BBOA Bats SAC, especially given that grazing is not to be considered as a possibility on this solar park during the operational phase. In addition, the assessment again fails to identify that artificial lighting in the form of security lighting will probably be used at site compounds, welfare units etc. in the summer during the hours of darkness as well as in the winter months.		bats is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The buffer areas at the Solar PV Sites have been designed to take account of foraging/commuting bats. A minimum offset of 15m from all hedgerows, tree lines and woodlands has been designed in to the proposals. This is in accordance with minimum offset from 'core bat habitat' for horseshoe bats, as advised and defined in Wiltshire Council's Trowbridge Bat Mitigation Strategy SPD which the Applicant refers to. Notwithstanding this assessment, a much reduced quantum of permanent pasture now remains within the Solar PV Sites, which now totals approximately 16.2 ha following changes to the Order Limits subsequent to Preliminary Environmental Information Report (PEIR) stage. An assessment of impacts relating to construction phase lighting on ecological

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				features (including bats) is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This concludes that lighting would not give rise to significant effects on bats.
Wiltshire Council	Ecology and biodiversity	Foraging / Commuting Bats – Operation Phase Impacts 8.102. Paragraph 9.10.160 of Chapter 9 states: <i>“The present uncertainty over how bats use solar arrays is another reason why 15m wide buffers from field boundaries are proposed. A precautionary approach has been taken which assumes that bat foraging activity could be reduced directly over solar panels.”</i> 8.103. This assessment is concurred with and whilst the limitations to the studies undertaken to date as set out in the assessment are noted, it does appear that emerging evidence indicates there is a reduction in bat foraging activity over fields containing solar panels. Moreover, the	No	The applicant notes this comment. A detailed assessment of impacts on foraging/commuting bats is presented in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This concludes that with the implementation of appropriate mitigation, there will be no significant impact on foraging/commuting bats. It is recognised that the Scheme has been amended since Preliminary Environmental Information Report (PEIR) stage, with more details on retention of habitat for foraging/commuting bats now available.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		council has to apply the precautionary principle in the absence of ecological survey data / information to the contrary and so must assume there will be a reduction in bat activity (foraging / commuting) over the fields with solar panels. 8.104. The assessment in Chapter 9 concludes no significant adverse effects on foraging / commuting bats at the Solar PV Sites given embedded mitigation measures, and that with implementation of habitat creation and enhancement measures set out on the LEMP, that residual effects on foraging / commuting bats during the operation and maintenance phase would be neutral and not significant. It goes on to suggest there is potential for a significant beneficial effect on the bat population at a Local level. It is considered that this neglects to fully take account of the likely impacts on foraging / commuting bats associated with the loss of permanent pasture and the fact that a precautionary		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		approach must be taken when considering impacts on bat activity over fields containing solar panels. The assessment also assumes that the enhancement measures will be realised, whereas paragraph 1.4.3 of Volume 1, Chapter 1 (Introduction) indicates that the applicant may opt not to deliver enhancement measures. 8.105. Therefore, it is considered that insufficient information and evidence has been submitted to augment the conclusion put forward in Chapter 9 of no significant adverse effect on foraging / commuting bats during the operational phase. Furthermore, in light of the discussed emerging evidence regarding how bat activity over fields with solar panels seems to be adversely affected, in the absence of evidence to suggest otherwise, and given the vast scale of the proposed solar park, the council must consider the worst-case scenario and apply a risk-based approach. As such, the council's Ecology and Biodiversity Officer		

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		does not agree with the conclusion of no significant adverse effect and consider this likely constitutes an underestimation of the potential adverse effects.		
Wiltshire Council	Ecology and biodiversity	Brown Hare: 8.106. The assessment of operation phase impacts suggests a benefit to hares as a result of the expected reversion of land to sheep grazed or cut grassland, but as already discussed, Chapter 3 indicates that the assessment should have assumed there will be no grazing during operation of the solar park.	No	Comment noted. The assessment of impacts on brown hare within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] assumes the operational Solar PV Sites will be managed through cutting. A beneficial impact on brown hares is concluded.
Wiltshire Council	Ecology and biodiversity	Breeding Birds: Ground Nesting Birds of Open Farmland – Construction Phase Impacts: 8.107. Chapter 9 states that installation of Solar PV panels and BESS compounds will displace ground-nesting bird species which preferentially nest in open habitats and that the species of conservation concern most likely to be impacted are skylark and yellow wagtail. The assessment includes a	No	The Applicant notes this comment and the limitations of carrying out surveys spread across two seasons are acknowledged in section 1.2 of Environmental Statement (ES) Volume 3, Appendix 9-4: Breeding Bird Survey Report [EN010168/APP/6.3] However, the survey results are considered to be representative of breeding bird activity as annual crop rotations will typically influence bird diversity, abundance and productivity in any given year. Surveys

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		preliminary territory analysis that indicates that 167 skylark territories and 3 yellow wagtail territories are present within the Solar PV Sites; although it acknowledges that surveys at an additional area of Lime Down C added in June 2024 have not yet been undertaken. As highlighted earlier, an entire breeding season's worth of survey visits have not been undertaken in any one year, with survey visits instead split across two years – this approach is not advocated and places doubt on the robustness of the territory analysis. Therefore, it is recommended that the numbers of territories quoted are treated very much as estimates.		completed over two separate years will also mitigate for some of the annual variations for each species.
Wiltshire Council	Ecology and biodiversity	8.108. The assessment specifies that skylark and yellow wagtail will likely be displaced to a significant degree due to installation of tall structures and other hardware in arable fields, which may lead to population fragmentation and increased intra-specific pressures on surrounding arable and grassland habitat, which may be	No	The Applicant notes this comment.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		at, or approaching, carrying capacity. The council concurs with this appraisal.		
Wiltshire Council	Ecology and biodiversity	8.109. Paragraph 9.10.230 indicates that as scheme design is evolving it is likely some fields will be removed from the developable area of the Scheme and that a proportion of these may be utilised to deliver nesting bird mitigation within the Scheme but highlights that design proposals are yet to be finalised. It concludes that in the absence of mitigation, skylark and yellow wagtail would be displaced for the lifetime of the Scheme which would likely constitute a significant adverse effect at a District level. In addition, corn bunting, grey partridge and quail comprise additional ground-nesting species recorded within the Sites and quail is listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). The assessment specifies that the proposed mitigation package will be detailed in the Environmental Statement (ES) once the full extent of impacts has been identified. 8.110. As such, the council cannot provide	No	The Applicant notes this comment. Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] includes an assessment of the impact of the Scheme on ground nesting birds (including skylark) and sets out how mitigation will reduce significant effects, including how the design of the Scheme has included provision of entire fields designated as set-aside to provide suitable habitat for ground nesting birds (particularly skylark) for the lifetime of the Scheme. These areas are shown in ES Volume 2, Figure 3.4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		comments on the adequacy and efficacy of proposed mitigation for ground nesting birds, and it is strongly suggested that a supplementary consultation is conducted by the applicant once surveys are completed. Nonetheless, it is recommended that considerable areas outside of the solar arrays are set aside and subject to appropriate management for these species as compensation for the loss of nesting habitat. These areas must comprise suitable areas of grassland or arable farmland as indicated in paragraph 9.10.234 and must be appropriately situated and managed such that the habitat requirements of these species are met. It is critical that adequately sized areas are provided as compensatory habitat for the substantial loss of territories. Paragraph 9.10.234 states that the approach to mitigation will be discussed with relevant stakeholders and it is strongly advised that this should include Wiltshire Council.		
Wiltshire Council	Ecology and biodiversity	8.111. Paragraph 9.10.235 states that residual effects on skylark and yellow	No	Comment Noted

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		wagtail haven't been predicted as there is insufficient information at this stage. The council concurs with this judgement.		
Wiltshire Council	Ecology and biodiversity	8.112. In terms of the operational phase impacts on ground nesting birds of open farmland, paragraph 9.10.239 discusses enhanced foraging opportunities over time and suggests a significant beneficial effect at the District level could be possible. However, the council's Ecology and Biodiversity Officer would heed some caution in respect of this projection in light of the substantial displacement likely to have occurred and which may not be adequately offset if adequate areas of compensatory habitat are not provided in the vicinity.	No	As set out in section 9.12 of Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] as part of additional mitigation for ground nesting bird mitigation, a number of fields have been removed from hosting infrastructure for the Scheme and will be managed sensitively as set out to provide improved nesting habitat for these species. These fields will either be managed as permanent grassland with a late season hay-cut (to avoid disturbance to birds during the breeding season) or as set-aside. These areas are shown in ES Volume 2, Figure 3.4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. Ecological mitigation and enhancement measures for birds, including areas to be set aside for the benefit of ground-nesting birds (particularly skylark) are described in

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				ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], and are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]
Wiltshire Council	Ecology and biodiversity	Overwintering Birds – Construction Phase Impacts 8.113. Wintering bird surveys are still ongoing at areas of additional land at Lime Down C and Lime Down D. The assessment assumes a significant adverse effect is possible due to potential displacement of a wintering bird assemblage but states that the assessment will be revisited upon completion of the wintering bird surveys and that a package of mitigation measures, if deemed to be required, will be presented in the ES chapter. Thus, it is strongly advised that the applicant undertakes a supplementary consultation once surveys are complete and any mitigation measures have been determined.	No	Survey findings are set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] supported by baseline information presented in ES Volume 2, Appendices 9-1: Ecological Baseline Report to 9-7: Wintering Bird Survey Report [EN010168/APP/6.3].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	DCO Conditions / Requirements: 8.114. At this initial stage, the council requests that the following heads of terms of DCO requirements are included for council approval: 1. Ecology Mitigation and Enhancement Plan (EMEP) – a scaled drawing showing all existing ecological features, together with mitigation and enhancement measures in relation to solar panel layout. Specify buffer distances, locations of new planting, sowing and other permanent features, whether retained or created. 2. Biodiversity Monitoring Strategy – detailing surveys of habitats and species /species groups. 3. Detailed Landscape and Ecology Management Plan (LEMP). 4. Final Construction Environmental Management Plan (CEMP). 5. Mechanisms to secure compliance with approved documents and plans, including for any remedial action required.	No	The comment is noted. The Requirements are set out in Schedule 2 to the draft Development Consent Order (DCO) [EN010168/APP/3.1]. These include a number of Requirements securing the approval of detailed management plans, substantially in accordance with the outline management plans that have been submitted with the DCO Application, including: • Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18]; • Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]; • Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]; and • Outline Decommissioning Strategy (DS) [EN010168/APP/7.14].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		6. Lighting Strategy, which covers construction and operational / maintenance phases. 7. Requirement to secure use of horizontal directional drilling (HDD) under watercourses, woodland, hedgerows and any other habitats of importance lying along the cable route. 8. Monitoring contribution from applicant to be payable to the Local Planning Authority (amount to be agreed). 9. Phasing programme for the delivery of mitigation, compensation and enhancement alongside the development of the solar farm. 10. Decommissioning plan.		
Wiltshire Council	Ecology and biodiversity	d) The exact ecology and biodiversity proposals, including all embedded mitigation and enhancement measures for all species / species groups.	No	This has been set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.2] and the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Ecology and biodiversity	d) Full and complete ecological surveys, with corresponding baseline information, which address the methodology deficiencies highlighted in this response, for the solar PV sites and cable connection route, ideally covering both seasons within same year period. e) Detailed Biodiversity Net Gain (BNG) assessment, including habitat condition assessment sheets, species lists and completed Statutory Biodiversity Metric.	No	Survey findings are set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] supported by baseline information presented in ES Volume 2, Appendices 9-1: Ecological Baseline Report to 9-7: Wintering Bird Survey Report [EN010168/APP/6.3]. A detailed Biodiversity Net Gain Assessment Report [EN010168/APP/7.8], including habitat condition assessment sheets, species lists and completed Statutory Biodiversity Metric [EN010168/APP/7.9] is provided in Volume 7 of the Development Consent Order (DCO) submission.
Wiltshire Council	Ecology and biodiversity	d) Detailed and robust assessment of the likely effects of the scheme, including the cable connection route and the solar PV sites, for ecology and biodiversity matters and in relation to all habitat types and species / species groups (please note this should also be provided for all other technical disciplines). e) Detailed assessment of the potential noise and vibration effects from scheme	No	Detailed assessments have been set out within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1],

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		components and associated hardware on ecological receptors/ species. f) Detailed assessment of the potential effects to ecological receptors / species resulting from maintenance (cleaning) of the solar PV hardware. g) Detailed assessment of the potential effects caused by lighting during the construction, operation and decommissioning phases on ecological receptors / species.		
Wiltshire Council	Ecology and biodiversity	10. A Biodiversity Monitoring Strategy is to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase. This should detail surveys of habitats and species / species groups. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures. A monitoring contribution payable to the Local Planning Authority will be sought from the applicant (amount to be agreed).	No	An Outline Landscape and Ecological Management Plan (LEMP) has been prepared and is available in Development Consent Order (DCO) Volume 7 [EN010168/APP/7.18]. This prescribes a comprehensive ecological monitoring programme to be undertaken during the operational phase which will be a legal requirement and would be fully funded.

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Wiltshire Council	Decommissioning and construction / Transport and access	u) The identification of a suitable set of Key Performance Indicators (KPIs) to measure the applicant's activities against. Of particular interest, would be the generation of KPIs associated with 'empowering communities' and measures to monitor compliance with the Construction Traffic Management Plan and Construction Work Travel Plan.	No	Measures to monitor construction vehicle traffic and construction worker travel are set out in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] which includes an appended Construction Worker Travel Plan (CWTP) .
Wiltshire Council	Decommissioning and construction / Transport and access	7. The location and specification for all scheme accesses and Highways Improvement Areas which affect the Local Highway Network are to be submitted to and agreed by the Local Highways Authority prior to the commencement of the construction phase.	No	All accesses are listed in Environmental Statement (ES) Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] and shown on ES Volume 2, Figure 13-9: Construction Access Locations: Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-10: Construction Access Locations: Cable Route Corridor [EN010168/APP/6.2]. The Highway Improvement Areas are listed in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] and shown on ES Volume 2, Figure 2-1: Elements of the Site [EN010168/APP/6.2].

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				These works are authorised in the Draft Development Consent Order [EN010168/APP/3.1] and must be completed to the reasonable satisfaction of the relevant street / highway authority.
Wiltshire Council	Decommissioning and construction / Transport and access	13. A Construction Traffic Management Plan (CTMP), including any provisions for abnormal loads, to be submitted to and agreed by the Local Highway Authority prior to the commencement of the construction phase. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.	No	An Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] which aims to ensure that the effect of the construction phase on the local highway network is minimised has been prepared and is secured as part of the Development Consent Order (DCO). This document includes an appended Construction Work Travel Plan and AIL assessment in Annex D [EN010168/APP/7.22] , highway improvement areas have been added to include for AIL movements. The AIL movements will occur under licence and agreed with the LHA and police
Wiltshire Council	Decommissioning and construction / Transport and access	14. A Construction Work Travel Plan (CWTP) to be submitted to and agreed by the Local Highways Authority prior to the commencement of the construction phase. This plan is to include suitable monitoring	No	An Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] which aims to ensure that the effect of the construction phase on the local highway network is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		measures to assess compliance, including appropriate remediation measures.		minimised has been prepared and is secured as part of the Development Consent Order (DCO). This document includes an appended Construction Work Travel Plan in Annex D of the Outline CTMP [EN010168/APP/7.22] .
Wiltshire Council	Decommissioning and construction / Transport and access	15. A Public Rights of Way Management Plan (PRoWMP) to be submitted to and agreed by the Local Highways Authority prior to the commencement of the construction phase, which will contain sufficient mitigation measures to protect the safety and usability of the public rights of way network during the construction phase. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.	No	An Outline PRoW Management Plan (PRoWMP) [EN010168/APP/7.17] containing relevant measures to minimise disruption to PRoW users has been prepared and is secured as part of the Development Consent Order (DCO).
Wiltshire Council	Decommissioning and construction	Once the detailed design proposals for the scheme are known, further information will be required by the council in order to fully assess the associated impacts of the proposals. To assist the council with this, further information is required as follows:	No	The Applicant confirms that a Decommissioning Statement forms part of the Application documents. This is set out in the Outline Decommissioning and Restoration Plan [EN010168/APP/7.9] , which has been submitted alongside the Development Consent Order (DCO) Application.

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		c) A detailed Decommissioning and Land Restoration Plan.		A Requirement in the Draft DCO [EN010168/APP/3.1] secures that a detailed Decommissioning and Restoration Plan must be approved by the relevant planning authority before decommissioning.
Wiltshire Council	Decommissioning and construction	Once the detailed design proposals for the scheme are known, further information will be required by the council in order to fully assess the associated impacts of the proposals. To assist the council with this, further information is required as follows: s) A site-specific Construction Management Statement which covers dust suppression during construction works.	No	An Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] , which includes dust suppression measures has been prepared and submitted as part of the Development Consent Order (DCO) application.
Wiltshire Council	Decommissioning and construction	5. A Phasing Programme for delivery of Mitigation, Compensation and Enhancement alongside the construction of the solar farm should be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase.	No	A phasing programme for delivery of mitigation, compensation and enhancement has been provided in the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] , the Biodiversity Net Gain (BNG) Report [EN010168/APP/7.8] and the

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				Commitments Register [EN010168/APP/6.5].
Wiltshire Council	Decommissioning and construction	11. A Lighting Strategy is to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase, which will contain sufficient consideration of / or provision of mitigation measures to protect the environment during the construction, operational and decommissioning phases.	No	A Lighting Strategy is included as part of Environmental Statement (ES) Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] . Lighting it also covered in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] , Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13] , Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] and Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] .
Wiltshire Council	Decommissioning and construction	12. A Construction Environmental Management Plan (CEMP) is to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase which will contain sufficient mitigation measures to protect the environment during the construction phase. This plan is to include suitable monitoring measures to	No	An Outline Construction Environmental Management Plan (CEMP) has been prepared and is available in Development Consent Order (DCO) Volume 7 [EN010168/APP/7.12] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		assess compliance, including appropriate remediation measures.		
Wiltshire Council	Decommissioning and construction	18. A Decommissioning Strategy and Decommissioning Environmental Management Plan (DEMP) are to be submitted to and agreed by the Local Planning Authority prior to the commencement of the decommissioning phase of this development which will contain sufficient mitigation measures to protect the environment during the decommissioning phase. This will include maximising recycling and reuse of scheme components at the end of their life. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures.	No	An Outline Decommissioning Strategy (DS) has been prepared covering these aspects and is available in Development Consent Order (DCO) Volume 7 [EN010168/APP/7.14] .
Wiltshire Council	Cumulative Effects / Soils and agriculture	12. The recent motion passed by Wiltshire Council regarding solar farms states: Whilst not opposed to the principle of the development of solar farms in line with the National Planning Policy Framework, this Council is increasingly concerned at the concentration of solar farms, battery	No	The cumulative impact of the Scheme along with other proposed developments (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		storage and associated infrastructure in Wiltshire. Some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside. Wiltshire Council therefore calls on the Secretary of State for the Department of Levelling Up, Housing and Communities to define more closely what is meant by 'cumulative impact' regarding solar farms, battery storage, and associated infrastructure and to take clear steps to ensure that solar developments are more evenly spread across the UK and not concentrated in specific areas effectively industrialising the countryside. We would also ask for clarity of the priority given to ensuring that food production and farming are not destroyed as industries in specific areas through an excessive concentration of solar farms given the massive impact that would have on the		The Applicant recognises that is the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. It is agreed that agricultural land will be taken out of production temporarily for 60 years. The Scheme is classed as a Nationally Significant Infrastructure Project and the decision to grant consent for the Scheme must be made in accordance with the relevant National Policy Statements for Energy. The Scheme is designated as 'critical national priority' (CNP) infrastructure by National Policy Statement for Energy EN-1, and therefore the overarching need case for this energy infrastructure must be given substantial weight by the decision maker when assessing the application. Paragraph 4.2.15 of NPS EN-1 confirms that, the mitigation hierarchy having been applied to the design of the proposals and

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		rural way of life in villages that have been farmed for time immemorial. This application does not address the concerns raised in that motion and needs to do so in order to be acceptable in planning terms.		identification of mitigation measures, the residual impacts of a project “are unlikely to outweigh the urgent need for this type of infrastructure” and that it is unlikely that consent will be refused in any but “the most exceptional circumstances”.
Wiltshire Council	Cumulative effects / Landscape and visual	Chapter 21 (Cumulative and In-Combination Effects): 7.43. Chapter 21 (Cumulative and In-Combination Effects) considers the potential for effect and interactions and cumulative effects as a result of the Scheme. This chapter includes Table 21-1 Zol Extents for Assessment of potential Cumulative Effects, which identifies that the Zol extents for the cumulative assessment of landscape and visual effects extends up to 5km from solar PV sites (Lime Down A to E), and 0.5km from the cable connection route search corridor. 7.44. Despite a reference from Chapter 21, there is no justification included within Chapter 8 (Landscape and Visual) or its	No	The Cumulative Assessment within the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment provided in ES Volume 3 Appendix 8-1 LVIA Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		supporting Volume 3 appendices as far as has been observed to justify ZoI extents for the purpose of Landscape or Visual cumulative assessment.		defined Study Areas. A Technical Note has also been issued to Wiltshire County Council. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the proposed Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. The existing solar developments within the Cumulative Study Area for part of the existing baseline against which the scheme has been assessed. The Cumulative Assessment considers the impact of the Scheme in combination with these existing schemes as well as other schemes that are within Planning, but not yet built. ES Volume 1 Chapter 21 Cumulative and in-combination effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Cumulative effects / Landscape and visual	7.45. Previous council feedback on the long and short lists of projects to be included within the Cumulative Assessment highlighted some concerns in relation to the current 5km cumulative Zol extent for the cumulative assessment of certain landscape receptors, scoped in for assessment i.e. the specific Landscape Character Types / Areas, the setting to the Cotswold National Landscape Designation, and in relation to visual assessment for certain linear routes such as the Fosse Way where there is potential for sequential visual effects, all potentially extending beyond the existing 5km study area / Zol limits.	No	The Cumulative Assessment within the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment provided in ES Volume 3 Appendix 8-1 LVIA Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. The Methodology sets out the differences between In combination, or In succession and Sequential Visual Effects (Para 2.29). In terms of sequential effects, receptors assessed will be popular paths- those typically promoted or recognised in some

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				way such as National Trails, Recreational Routes, long distance trails or locally promoted walks. A Technical Note has also been issued to Wiltshire County Council. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the proposed Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. The existing solar developments within the Cumulative Study Area for part of the existing baseline against which the scheme has been assessed. The Cumulative Assessment considers the impact of the Scheme in combination with these existing schemes as well as other schemes that are within Planning, but not yet built. ES Volume 1 Chapter 21 Cumulative and in-combination effects [EN010168/APP/6.1] assesses the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Cumulative interactions for all technical disciplines.
Wiltshire Council	Cumulative effects / Landscape and visual	7.46. A number of existing operational solar PV / BESS developments (as built) and proposed (in planning or with planning permission) schemes were additionally highlighted in feedback to the applicant. The applicant has subsequently confirmed that existing operational solar schemes identified by the council will not be included on short lists but will form part of the existing landscape and visual baseline. It is the council's Landscape Officer's view that all large-scale solar development within the cumulative ZoI should be scoped into the cumulative landscape assessment.	No	The Cumulative Assessment within the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment provided in ES Volume 3 Appendix 8-1 LVIA Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. A Technical Note has also been issued to Wiltshire County Council. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the proposed Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. The existing solar developments within the Cumulative Study Area for part of the existing baseline against which the scheme has been assessed. The Cumulative Assessment considers the impact of the Scheme in combination with these existing schemes as well as other schemes that are within Planning, but not yet built. ES Volume 1 Chapter 21 Cumulative and in-combination effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.
Wiltshire Council	Cumulative effects / Landscape and visual	7.51. It is noted and welcomed that the applicant's approach will be to continue to liaise with the host authority (Wiltshire Council) in relation to potential further planning applications that come forward	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		within the Cumulative Zone(s) of Influence for consideration as to whether these should be included on long and short lists and screened for their potential combined cumulative effects. Further discussions would be welcomed to agree final schemes with potential for likely significant cumulative landscape or visual effects. Further to the council's initial feedback on long and short lists, planning consent has subsequently been granted for the large solar farm located at 'Land at Red Barn, East of Kington St Michael, Chippenham' (Planning Application Reference: PL/2023/08481) and a new application for a solar farm is additionally identified at Land East of Battens Farm, Allington, Chippenham, SN14 6LT (Planning Application Reference: PL/2024/09410) both of these schemes are included within the extent of the cumulative landscape and visual ZoI.		
Wiltshire Council	Cumulative effects /	7.52. A summary of cumulative effects is included within Table 21-3. In relation to	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	Landscape and visual	Chapter 8 (Landscape and Visual) topic area, the summary states: "Overall, cumulative landscape and visual effects are not anticipated to be significant due to the distance between the Solar PV Sites and other developments, limited intervisibility between the Scheme and other developments, and the short-term and minor nature of impacts from the Scheme along the Cable Route Search Corridor." The council agrees that it is unlikely that there is much potential for either significant landscape or visual effects to arise from the cable connection route element of the scheme (even though the final route remains to be confirmed at this stage) due to the low magnitude and short-term nature of change connected with this project element in landscape or visual terms.		
Wiltshire Council	Cumulative effects / Landscape and visual	7.54. There is also likely to be limited potential for shared intervisibility between the Lime Down (A to E) site areas and existing operational large scale solar PV developments already present in the	No	Comment noted.

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		landscape, however the council's Landscape Officer considers that there is potential for some shared intervisibility between the existing operational solar development at Rodbourne Rail Farm, north of Corston and the northern field parcels located within Lime Down Area E. There is also limited potential for shared intervisibility between the existing operational solar development at Hill Hayes Lane, Hullavington and Lime Down C. While this potential is limited and unlikely to result in an assessed significant cumulative visual effect, the potential for some shared intervisibility exists. This could influence overall judgements in relation to cumulative effects upon landscape character in terms of perceptual aspects of character.		
Wiltshire Council	Cumulative Effects	2. Cumulative impact. Whilst cumulative impact is not clearly defined in the NPPF, there is a clear need to take into account the cumulative impact of renewable energy provision. Lime Down in itself represents a proposal that we feel goes far beyond a reasonable test for cumulative impact. To	No	The cumulative impact of the Scheme along with other proposed developments (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] .

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		see that much farmland converted and the essential industrialisation of the countryside on that scale definitely, in the Council's view, goes beyond any reasonable cumulative impact and provides good grounds for refusal.		The Applicant recognises that is the role of the planning system to assess the balance of the impact of withdrawing land from agricultural production for a period of time against the benefits of renewable energy generation. It is agreed that agricultural land will be taken out of production temporarily for 60 years. The Scheme is classed as a Nationally Significant Infrastructure Project and the decision to grant consent for the Scheme must be made in accordance with the relevant National Policy Statements for Energy. The Scheme is designated as 'critical national priority' (CNP) infrastructure by National Policy Statement for Energy EN-1, and therefore the overarching need case for this energy infrastructure must be given substantial weight by the decision maker when assessing the application. Paragraph 4.2.15 of NPS EN-1 confirms that, the mitigation hierarchy having been applied to the design of the proposals and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				identification of mitigation measures, the residual impacts of a project “are unlikely to outweigh the urgent need for this type of infrastructure” and that it is unlikely that consent will be refused in any but “the most exceptional circumstances”.
Wiltshire Council	Cumulative effects	7.47. It is noted that the approach to the cumulative assessment within the PEIR includes. • The assessment of Cumulative Sites based on the Lime Down Solar PV Sites A to E. • The assessment of Cumulative Developments being the Scheme in combination with other similar developments, these being solar projects in the local area.	No	Comment noted.
Wiltshire Council	Cumulative effects	7.48. For the purpose of the cumulative assessment a long list of developments is provided in Appendix 21-1 (Volume 3) which lists all potential developments within the identified Zol. 7.49. The PEIR states the identified long list of developments has been screened by the applicant to determine their potential to	No	Comment noted.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		interact with the Scheme in a manner that has the ability to generate cumulative effects. This initial screening is stated to consider the scale of the development and its potential to generate significant environmental effects, the location of the development, and how the development's programme relates to that of the Scheme.		
Wiltshire Council	Cumulative effects	7.50. A short list of developments is then formed (provided in Table 21-2) which details why the development has been selected for further assessment (i.e. those developments progressing to further Stages 3 and 4 of the cumulative assessment). The location of these developments is shown in Figure 21-1. It is noted that while the location of these developments is indicated with a pin marker on this Figure, the spatial extents are not currently illustrated. Due to the substantial areas of land required for these schemes, the council considers that the development areas should be included on the Figure to understand the spatial relationship with the Lime Down areas A to E.	Yes	The spatial extent of nearby solar projects are shown on Environmental Statement (ES) Volume 2, Figure 21-2 Location of Cumulative Solar Infrastructure in Proximity to Lime Down [EN010168/APP/6.2].

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Wiltshire Council	Cumulative effects	8.12. For similar reasons, the provision of suitably informed commentary on the assessment of cumulative and in-combination effects has not been possible. Thus, comments relating to the potential for such effects can be provided subsequent to completion of the scheduled surveys on the additional land at Lime Down C and D and within the CRSC.	No	Comment noted.
Wiltshire Council	Cumulative effects	l) Provision of further clarity on cumulative assessment methodology, applicable Zones of Influence and criteria for inclusion in the long and short lists. Mapping information should be provided to aid the Council in its assessment.	No	Further detail regarding the cumulative assessment methodology including Zone of Influence extents for potential cumulative impacts with other developments, and the long and short list criteria is provided within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. The chapter is supported by ES Volume 2, Figure 21-1 Location of Short List Cumulative Schemes [EN010168/APP/6.2] and ES Volume 2, Figure 21-2 Location of Cumulative Solar Infrastructure in Proximity to Lime Down

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				[EN010168/APP/6.2]. The long list of Schemes is contained within ES Volume 3, Appendix 21-1: Long List of Cumulative Schemes [EN010168/APP/6.3].
Wiltshire Council	Cultural heritage / Cumulative Effects	11.9. However, the council is concerned that the detailed methodology for identifying the long and short list of projects for consideration in the cumulative impact assessment continues to lack clarity. Additional justification and explanation on how the zone of influence (Zol) for cultural heritage of 2km from the development area has been derived would also be helpful. As identified in the Landscape and Visual section above, it is noted that paragraph 6.8.12 states that "The justification for each Zol is presented in Volume 2, Figure 21-2", however this figure has not been published. The council sought clarification from the applicant who indicated that this should instead refer to Figure 21-1. Furthermore, and as previously advised, the applicant is asked to provide GIS mapping of the	No	The assessment of cumulative impacts on the historic environment has been informed by a flexible, proportionate approach in line with Historic England guidance and agreed with Wiltshire Council (WC). Further detail is provided in Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] Table 20-4. The Cumulative Assessment within the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] is based on the 10km Cumulative Study area for the Scheme. This is considered suitable to identify any

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		development areas, which would aid interrogation of the data. At present, this is only identified in written format and via point data on maps.		potential cumulative effects on identified receptors. The Methodology for the Cumulative Landscape Assessment provided in ES Volume 3 Appendix 8-1 LVIA Methodology [EN010168/APP/6.3] has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. A Technical Note has also been issued to Wiltshire County Council. Additional mapping has been included in the LVIA in ES Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] to show existing solar schemes, the proposed Site and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas. The existing solar developments within the Cumulative Study Area for part of the existing baseline against which the scheme has been assessed. The Cumulative

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				Assessment considers the impact of the Scheme in combination with these existing schemes as well as other schemes that are within Planning, but not yet built.
Wiltshire Council	Cultural heritage	Policy Context 11.1. The applicant has set out the relevant policy and legislation within Chapter 12 (Cultural Heritage) of the PEIR. These include: • The requirements of the Planning (Listed Building and Conservation Areas) Act 1990. • Section 66 of the aforementioned act referring to planning permissions, which requires that special regard be given to the desirability of preserving or enhancing listed buildings, their settings or any features of special architectural or historic interest which they possess. • Paragraph 58B of the Planning Act 1990 which requires special regard to be given to the desirability of preserving or enhancing	No	The Applicant notes the policy context and legislation set out by the Council, and welcomes confirmation that the assessment methodology, study areas and scoping tables included in Environmental Statement (ES) Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3] are agreed.

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		registered parks and gardens. • Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas. 11.2. The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. 11.3. Wiltshire Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance." It is also required that distinctive elements of		

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		Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.		
Wiltshire Council	Cultural heritage	Consultation Documents 11.4. In preparing these comments, the council has considered Chapter 12 (Cultural Heritage) of the PEIR and its associated figures and technical appendices. Chapters 1 to 6 of the PEIR have also been reviewed, which set out introductory information to the proposals and the scheme, its development area, design evolution and alternatives considered, the legislative context and the EIA methodology. Consideration has also been had to Chapter 21 (Cumulative and In-Combination Effects). 11.5. It is noted that there are no designated heritage assets located within any of the solar sites and that the key issues to be taken into account will	No	The Applicant notes agreement that designated heritage assets are not located within the solar sites and that the key consideration relates to the setting of heritage assets in the wider vicinity. The full assessment of the cable route corridor is now provided within the Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by appendices in ES Volume 3 (12.1 to 12.7 [EN010168/APP/6.3]), which addresses these matters in accordance with the agreed methodology.

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		therefore be the setting issues, i.e. the likely impact on any contribution made by the site to the significance of assets in the vicinity. However, the applicant has acknowledged that the cable connection route is less well defined, and the assessment is consequently not so advanced. The applicant has indicated that full assessment will follow in the ES. 11.6. The council confirms that the methodology guiding the identification of assets which are likely to be impacted, including the proposed study areas and the commitment to allowing some flexibility / discretion in considering highly graded assets has previously been agreed. Additionally, the council welcomes the inclusion of the additional assets within the scoping tables as previously requested. Therefore, the council can confirm that the scoping tables (Volume 3, Appendix 12-1) indicating which assets are to be scoped into the assessment are agreed. Volume 3, Appendix 12-4 sets out the Historic		

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		Environment Record (HER) Records and Designated Heritage Assets within the Cabe Route Study Area and the council confirms that this has also previously been agreed.		
Wiltshire Council	Cultural heritage	11.7. With regard to the Cultural Heritage Impact Assessment Tables, as set out in Volume 3, Appendix 12-5, it is understood that detailed assessment of the significance of scoped in assets and the extent and nature of the contribution made by their settings has not yet been undertaken. This will lead on to more detailed assessment of the impacts of the scheme. As a consequence, the impact tables are based on the high level, in principle, assessment which has been undertaken to date and a range of possible values have been identified for the magnitude of impact and significance of effect and for the residual impacts following mitigation. These are wide ranges (covering the whole range of possibilities from neutral to major adverse) and it is agreed that they cover the potential outcomes.	No	The assessment of residual effects to designated and non-designated heritage assets has been completed and is presented in Table 5 to 16 in Environmental Statement (ES) Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]. Where no additional mitigation measures are required beyond the embedded mitigation, the residual effects for designated heritage assets located outside the Order Limits remain as identified following embedded mitigation, ranging between Neutral and Minor/Moderate Adverse.

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Wiltshire Council	Cultural heritage	11.8. It is noted that some mitigation has been suggested at this stage based on the potential for impact and the applicant's current (desktop) understanding of the significance of scoped in heritage assets, industry best practice and professional judgement. This mitigation is shown on the indicative site layouts and masterplans included in the consultation documents. The indicative site layouts at this stage appear to indicate initial mitigation via the exclusion of areas from development as buffers. This is welcomed by the council as this is likely to address some specific and immediately obvious areas of concern.	No	An overarching mitigation strategy has been prepared in Environmental Statement (ES) Volume 3, Appendix 12.6: Archaeological Mitigation Strategy [EN010168/APP/6.3.12.6] , and engagement with the Council will continue through the post-determination stage of the project to ensure appropriate implementation.
Wiltshire Council	Cultural heritage	11.10. At this stage, and based on the information available to date, the council agrees that impacts on built heritage assets are likely to be temporary in nature and are therefore of lesser concern. However, alternative routes are noted in some areas and, where possible, routes would ideally be chosen to avoid highly graded assets, and particularly landscapes to avoid even the temporary harm from the proximity of	No	Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] , supported by ES Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3] has assessed the potential impacts of the Scheme on built heritage assets. Where required, appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage

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		construction. For example, close to the Grade I Listed Corsham Court and Grade II* Corsham Court registered landscape.		[EN010168/APP/6.1] for embedded mitigation and Section 12.11 for additional mitigation). Temporary construction impacts have been assessed and are not considered to result in harm to designated assets. Alternative route options were considered to avoid proximity to highly graded heritage assets where possible, and the final cable route design reflects these considerations. As a result, there would be no harm from indirect (i.e., setting) impacts caused by the cable route corridor.
Wiltshire Council	Cultural heritage	11.11. However, in order for the council to reach a definitive position on the likely heritage impacts, further work is required to be undertaken by the applicant. It is the council's expectation that the following works will be undertaken for inclusion in the ES, which will be submitted with the DCO application.	No	The Environmental Statement (ES) [EN010168/APP/6.1] has now been completed and includes the detailed assessment of heritage impacts, as set out in ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and supporting technical appendices [EN010168/APP/6.3] .
Wiltshire Council	Cultural heritage	11.12. The applicant is required to prepare significance and setting assessments for	No	Significance and setting assessments for individual heritage assets have been

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		the individual assets and these should be used to determine the contribution made by the site to this significance. Once available, this should be followed by an impact assessment, which takes the findings of the significance and setting assessments into account.		completed and are presented in Environmental Statement (ES) Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3] , and an impact assessment is presented in ES Volume 3 Appendix 12.8: Impact Assessment Table [EN010168/APP/6.3] .
Wiltshire Council	Cultural heritage	11.13. Verification on site will be required. It is acknowledged that the applicant's heritage team have committed to undertaking joint site visits to achieve this.	No	Site visits were undertaken, See Table 122 of Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] which describes the visits in detail.
Wiltshire Council	Cultural heritage	11.14. The applicant is required to undertake full assessment of the cable routes and cable connection corridor. The council also requires further detail on the likely impacts associated with the Highway Improvement Areas in order to allow assessment of heritage impacts.	No	Assessment of the cable route corridor has been completed in Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] , supported by appendices in ES Volume 3 Appendix 12.1 to 12.7 [EN010168/APP/6.3] .
Wiltshire Council	Cultural heritage	11.15. Furthermore, and as indicated above, clarity is required on the methodology for the cumulative impact assessment. In addition, the developable areas for the short-listed projects should be presented on mapping to aid assessment.	No	The methodology for the cumulative impacts is set out Section 12.12 of the Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] .

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		Further assessment will then be required once the individual significance assessments for assets have been undertaken.		
Wiltshire Council	Cultural heritage	11.16. It is understood that additional mitigation may be found to be necessary in order to limit the impact on heritage assets as required by current legislation and policy, and that this will be formulated as part of the continuing development of the scheme following the completion of significance and impact assessments. It is the council's expectation that all mitigation is identified within the ES and detailed scheme design.	No	Additional mitigation is set out in Section 12.11 of the Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] . An overarching archaeological mitigation strategy is provided in ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3] .
Wiltshire Council	Cultural heritage	12. Archaeology Considerations 12.1. Please note that the comments in this section only address aspects of the PEIR which relate to archaeological sites, features and findspots. Aspects related to setting and built heritage have been considered in the above section and Historic England will be considering scheduled monuments.	No	The Applicant notes the Council's comments regarding archaeological considerations. Since the preparation of the Preliminary Environmental Information Report (PEIR), the trial trench evaluation has been completed. The full assessment is now presented in Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] , supported by

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		12.2. Chapter 12 (Cultural Heritage) of the PEIR has collated all currently known archaeological data from within the proposed development area, including a sweep of all data from the Wiltshire Historic Environment Record, LiDAR plots and the results of a recently completed geophysical survey of all the fields that make up the site. 12.3. As the applicant acknowledges, the true archaeological potential of the scheme area is still to be determined as the trial trench evaluation, which is exploring the archaeological features identified by the geophysics, is currently underway and will not be completed for some time. 12.4. As a result of this developing situation, the council is unable to provide a definitive response to the likely impact of the proposed development upon cultural heritage issues. However, the council is able to provide an opinion on the mitigation strategies and the assessment of effects		appendices in ES Volume 3 (12.1 to 12.7 [EN010168/APP/6.3]). The ES [EN010168/APP/6.1] provides a definitive assessment of the likely impacts on archaeological assets and the measures proposed to manage these impacts in line with best practice.

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		that have been set out in Chapter 12. The council will also provide an outline of what the council's Archaeology Service will be expecting from the applicant during the preparation of the ES.		
Wiltshire Council	Cultural heritage	12.5. The applicant has set out the assessment assumptions and limitations in section 12.4. With regard to the assumptions contained within paragraph 12.4.3 (and specifically bullet points 6 to 9), the council would endorse most of the consultation and assessment process set out here, although the assumption that concrete feet for the solar panels can be accepted as embedded mitigation is not agreed. If solar panels are to be placed over areas of archaeological sensitivity, then these areas will have to be made the subject of either archaeological area excavations or Strip, Map and Sample (SMS), depending on the value of said archaeology. This is the strategy that the council's Archaeology Service employed for the solar farm at Wick Farm Lacock (20/06840/FUL), a strategy that has then		A meeting to discuss the archaeological mitigation strategy was undertaken with Wiltshire Council on the 13 August 2025. It was agreed that the AMS will be a flexible document that can be updated following further ongoing discussions after submission.

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		been followed for all subsequent solar farm application in the county.		
Wiltshire Council	Cultural heritage	12.6. Paragraphs 12.9.6 and 12.9.7 set out the embedded mitigation measures specific to archaeology. The council welcomes this strategy but again questions whether concrete feet are an acceptable mitigation measure.	No	Noted. The AMS will be a flexible document that can be updated following further ongoing discussions after submission.
Wiltshire Council	Cultural heritage	12.7. The applicant has set out its proposed approach to the decommissioning phase in paragraph 12.9.13. The council considers that it is refreshing to see the decommissioning phase addressed at this early stage and welcomes the commitments contained within this paragraph. However, these proposals do of course assume that they will suffice in 60 years' time when national and local political priorities and legislation (as well as available technologies) are likely to be different to today.	No	Comment noted.
Wiltshire Council	Cultural heritage	12.8. With regard to the applicant's initial assessment of the likely impacts of the scheme upon buried archaeology, as	No	Comment noted.

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		contained within paragraph 12.10.4, the council wishes to make the following comments: 12.8.1. The council concurs with the following statement contained in the first bullet point: <i>Where possible settlement activity is suspected (but currently unproven), for example, from the presence of a cluster Roman coin findspots, the sensitivity score is given as a range from Very Low (i.e., if these were just chance losses with no associated buried archaeological evidence) to Medium (i.e., if they represent the location of a buried Roman settlement);</i>		
Wiltshire Council	Cultural heritage	12.8.2. With respect to bullet point two, which states: <i>Where Medium value archaeological remains such as Iron Age/Romano-British settlement and field systems have been identified in areas where solar panels are proposed it has been considered that, with</i>	No	Noted. The AMS will be a flexible document that can be updated following further ongoing discussions after submission.

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		<i>standard mitigation in place in the form of placing the panels on concrete feet or evaluation trenching, the impact would be avoided, and it is therefore considered that the effects upon these remains would be Neutral during the construction phase. This is notwithstanding the fact there could be some impacts due to construction traffic movement, though such impacts could also occur anyway in the 'future baseline without the Scheme scenario' scenario, due to impacts from agricultural machinery;</i> As previously indicated, the council disputes that concrete feet are an adequate mitigation measure per se. It is considered that this issue will need to be resolved following the completion of the trial trench evaluation.		
Wiltshire Council	Cultural heritage	12.8.3. The applicant states in bullet point three that: <i>Whilst the magnitude of the impacts from the installation of panels (in the absence of mitigation) have been generally scored as a</i>	No	The assessment of the magnitude of the impacts has been completed and is presented in Tables 5 to 16 in Environmental Statement (ES) Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3] .

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		worst case Low adverse upon buried archaeological remains. Where there are also impacts from other infrastructure (i.e. proposed substations, BESS Area, fences, access tracks etc) within the Sites, these impacts have been scored as Low-High; The council considers the impacts of all aspects of the proposed development will not be fully assessed until the completion of the trial trench evaluation and therefore the range of impacts must remain open-ended.		
Wiltshire Council	Cultural heritage	12.8.4. The council concurs with the following statement contained within bulletpoint four: <i>Impacts to findspots are recorded as 'No impact likely', due to the possibility that they might be redeposited or represent chance losses, and the context of the find may have been lost; and</i>	No	Comment noted.
Wiltshire Council	Cultural heritage	12.8.5. Whilst the council concurs with the following statement within bullet point five, the issue of the impact of the solar panels themselves is to be addressed within the	No	Addressed within Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] , supported by appendices in ES Volume 3

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		ES: <i>Where archaeological excavation and recording are proposed as mitigation, (for example along the cable routes, access and haul roads, conversion units, battery storage compound, and substations), the adverse impacts upon the archaeological resource would still occur, with or without this mitigation in place, although the recording will serve to offset the adverse effects.</i>		Appendix 12.1 to 12.7 [EN010168/APP/6.3].
Wiltshire Council	Cultural heritage	12.9. The council welcomes the applicant's approach to the assessment of the significance of effect as set out in paragraphs 12.10.13 and 12.10.14. It is the council's expectation that these issues will be discussed with the applicant's archaeological consultants once the evaluation has been completed and the ES prepared. 12.10. Overall, the council is broadly content with the approach set out in Chapter 12 of the PEIR in relation to	No	Noted and addressed within Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].

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		archaeological matters. 12.11. The geophysical survey has provided the county with a valuable resource of new data on ancient settlement in the north-west of the county. 12.12. Additionally, the council welcomes the potential (as laid out in the PEIR) to scope sites of high archaeological potential out of the development altogether and for the funding of archaeological excavations and SMS investigations to mitigate impacts on areas that cannot be scoped out. Further to this, it is the council's expectation that a detailed mitigation strategy will be included in the ES following discussions between the archaeological consultants and the council's Archaeology Service once the full results of the trial trench evaluation are known.		
Wiltshire Council	Cultural heritage	12.13. The council are pleased to note that the PEIR has given thought to the impacts, not just of the construction phase, but also	No	Comment noted.

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		the operational phase (which is often dismissed) and the decommissioning phase. However, it is considered that looking ahead to the environmental and political conditions in 60 years' time may prove problematic.		
Wiltshire Council	Cultural heritage	12.14. At present, the main area of contention with the PEIR is the potential impact of the solar panels themselves. The council is sceptical as to the effectiveness of the 'concrete feet' mitigation and in the past, the council's Archaeology Service has insisted that areas of archaeological high potential in solar panel areas are to be made the subject of archaeological excavations in order to preserve such sites 'by record'. This policy has been consistently followed for all solar park schemes within Wiltshire and it is considered that this scheme, which is so full of potentially important archaeology, shouldn't be approached differently.	No	Noted. The AMS will be a flexible document that can be updated following further ongoing discussions after submission.
Wiltshire Council	Cultural heritage	f) The exact mitigation measures proposed to address identified cultural heritage impacts.	No	This has been set out within Environmental Statement (ES) Volume 1 Chapter 12: Cultural Heritage

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				[EN010168/APP/6.1]. All embedded mitigation is secured in the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/13.2], the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18], the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and the Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13].
Wiltshire Council	Cultural heritage	i) Significance and setting assessment for all individual cultural heritage assets should be prepared and used to determine the contribution made by the site to this significance. j) Joint site visits to be undertaken with respect to the verification of cultural heritage matters.	No	The applicant notes this comment. This has been set out within Environmental Statement (ES) Volume 1 Chapter 12: Cultural Heritage [EN010168/APP/6.1] and Table 12:22 describes site visits undertaken.
Wiltshire Council	Cultural heritage	m) Completion of the archaeological evaluation fieldwork.	No	The applicant notes this comment. This has been set out within Environmental Statement (ES) Volume 1 Chapter 12: Cultural Heritage [EN010168/APP/6.1].

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				Results of the fieldwork are set out in ES Volume 3 Appendix 12-5 Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3] .
Wiltshire Council	Cultural heritage	o) A full cultural heritage impact assessment, which takes the findings of the significance and setting assessments into account. This should include impacts associated with the Highway Improvement Areas. p) A detailed archaeological mitigation strategy.	No	A cultural heritage impact assessment is included in Section 12.8 of Environmental Statement (ES) Volume 1 Chapter 12: Cultural Heritage [EN010168/APP/6.1] and Volume 3, Appendix 12.8: Impact Assessment tables .
Wiltshire Council	Consultation and engagement	7. It is also recommended that the applicant consider the employment of an independent third party to act as a “relationship manager” between the applicant, local authorities, and the impacted communities to ensure that conversations remain positive and helpful.	No	The Applicant notes this comment and hopes that the availability for members of the public to express their views through the examination process pre-determination, and the provision of a dedicated Community Liaison Manager, as secured through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] would provide community groups a substantially helpful way of engaging with the Applicant and Scheme’s operators. It would be hoped that these avenues can be used to

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				positively respond to local concerns without the need for active protest. Should protests go ahead during the Scheme's construction or operation, the Scheme's operators would engage with Wiltshire Council and the Wiltshire Police to ensure the safety of both protesters and onsite workers is protected.
Wiltshire Council	Community benefits and impact	Appendix 1C Ideas for Community Benefit Initiatives 1. The council notes that the applicant has invited consultees to identify community benefit initiatives, which could be undertaken both on-site and off-site through a community benefit fund. 2. Wiltshire Council's suggestions for potential community benefit initiatives that could be delivered by the scheme are set out below: a) The creation of permissive public paths and bridleways so as to provide additional linkages between existing Public Rights of Way. If those permissive paths could be dedicated as formal Public Rights of Way	No	The Applicant welcomes Wiltshire Council's input in regard to Community Benefits. The Applicant has sought feedback on both onsite community benefits which are built into the scheme design, and offsite community benefits delivered via an administered fund. Where the Scheme is anticipated to benefit local people more specifically, this is done through, providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements.

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		upon the development reaching the end of its life, there would be additional public benefits. Consideration could also be given to creating an annual grant for work to improve the PROW network. b) The provision of public access land as part of the proposals, either in conjunction with proposals for biodiversity net gain or in other respects through making land available for specific uses which would benefit local communities. As part of other solar array type development in Wiltshire, this has sometimes taken the form of allotments, open space or perhaps even picnic or dog-walking areas. c) Off-site community benefits may be brought through a fund which may be administered for the lifetime of the development through representatives of the relevant Town and Parish councils or perhaps via existing Area Board structures. Such a fund could be used for local projects so as to bring economic, social and environmental benefits to the area. It may also be used as a source of educational		That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds.

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		purposes linked to the solar development. d) The development could include a component of shared community ownership of the solar farm, with consequent savings on energy bills to the local community. Alternatively, it may be helpful if local communities were able to benefit from the development through the provision of free or reduced-price electricity.		
Wiltshire Council	Community benefits and impact	3. The applicant also asked consultees to consider the framework, which could be put in place to manage and administer funding from the Community Benefit Fund. 4. The council has highlighted above that there is already a framework in place to facilitate grants through the Town and Parish councils and Wiltshire Council's Area Boards. In the event that the applicant did not wish to pursue management of the Community Benefit Fund through these mechanisms, the applicant could consider establishing a Community Forum for the scheme.	No	The Applicant welcomes the Council's comments regarding existing mechanisms for the administration of community benefit funding and acknowledges the role of Town and Parish Councils and Area Boards in distributing local grants. The Applicant confirms that the structure and mechanisms for administering the Community Benefit Fund will form a key part of ongoing consultation. As part of this process, the Applicant is seeking to secure an administered and independently

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				managed fund to ensure transparency, inclusivity, and long-term effectiveness. While existing frameworks will be considered, the Applicant is also open to exploring alternative models which would ensure that local communities are meaningfully engaged in the decision-making process and that funding is directed towards initiatives that deliver lasting local benefit.
Wiltshire Council	Community benefits and impact	5. A Community Forum could act as a good conduit between the local communities and Island Green Power. In addition to the oversight and management of any community benefit fund, the Community Forum could also facilitate engagement and communication between local communities, its elected representatives and the applicant throughout the life of the scheme. 6. If the applicant was minded to establish a Community Forum for this scheme, it is recommended that the applicant appoint an Independent Chair for the Forum so that it was impartial and run and steered	No	The Applicant is open to exploring alternative governance models, including the potential establishment of a dedicated Community Forum for the scheme, as suggested. The Applicant agrees that a Community Benefit Fund should be independently facilitated to ensure impartiality and to prevent any one party, or group of parties, from monopolising it.

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		independently. This could ensure that the Forum did not become monopolised by Island Green Power, its suppliers, or any one particular local group or interest.		
Wiltshire Council	Community benefits and impact	7. The council considers that there is merit in the applicant considering the establishment of a Community Forum, even if any Community Benefit Fund was administered through different means, due to the lack of formal engagement channels between the applicant and interested parties once the DCO has been consented. The council would welcome the opportunity to work with the applicant to devise suitable terms of reference for this Forum.	No	The Applicant is open to exploring alternative governance models, including the potential establishment of a dedicated Community Forum for the scheme, regardless of where the administrative responsibilities lie.
Wiltshire Council	Climate change and energy need / Site selection and alternatives	6.7. Additionally, the council considers that the following minor points should be incorporated into the further assessment on this topic: • Paragraph 7.3.16 should be updated to reflect the December 2024 NPPF publication. • The National Policy section should include reference to the Clean Power 2030 Action Plan, which was published in December	No	Comment noted. The applicant has submitted a Statement of Need [EN010168/APP/7.1] which address these and related comments as part of its application.

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		2024. • Paragraph 7.3.22 refers to the adopted Wiltshire Council Climate Strategy. Please note that this is a non-statutory document and is not part of the local development plan. • The Local Planning Policy needs to refer to the adopted Wiltshire Core Strategy and emerging Local Plan review, including CP42 and Policy 86 respectively. Based on existing timetables, the emerging Local Plan review is likely to be the development plan at the point of DCO determination.		
Wiltshire Council	Climate change and energy need	6.8. It is noted that the Chapter 7 of the PEIR analysis of whole life carbon (WLC) shows that the adverse impacts (in climate change terms) from the construction and decommissioning phases is clearly outweighed by the operational phase where renewable energy will be generated and stored. To clarify in this regard, the WLC includes embodied carbon, for example in the form of the carbon emitted to produce the panels, concrete blocks and supports, cabling, battery storage, transportation	Yes	Comment noted.

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		etc.,as well as how this will be managed in the decommissioning.		
Wiltshire Council	Climate change and energy need	14. The grid capacity absorbed by the solar farm puts at significant risk the ability to deliver the Local Plan which proposed a large amount of housing in the surrounding area which will also require grid connections. Given government's clear directive to deliver more housing, the solar farm should not even be considered until suitable increases.	No	By connecting to the National Electricity Transmission System, the Scheme will not impact on the ability for grid connections for local housing to be secured. Local housing connections are made to local Distribution Networks. Connecting more low-carbon generation to the National Electricity Transmission System will help to ensure that the electricity consumed by new (and existing) homes and businesses is low-carbon, i.e. consistent with the UK's legal requirement to achieve Net Zero by 2050. Once operational, the scheme will only import from the grid when there is excess generation on the grid, this would always be subordinate to national consumption needs, and/or in support of the smooth operation of the national electricity system and 'keeping the lights on'. The Applicant has secured a grid connection at Melksham to support the connection and operation of the proposed

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				scheme. This confirms that the necessary network capacity is available for the Scheme. Further details are provided in the Grid Connection Statement [EN010168/APP/7.5] .
Wiltshire Council	Climate change and energy need	4.2. National Policy Statements for Energy EN-1, EN-3 and EN-5, offer significant support for NSIP renewable energy development. Furthermore, both the last and the current government have issued Written Ministerial Statements (WMS) confirming the importance of renewable energy development.	No	Comment noted.
Wiltshire Council	Climate change and energy need	6. Climate Change Considerations Policy Context 6.1. It is considered that communicating the current action anticipated to meet net zero targets within the Climate Change Act 2008 (2050 Target Amendment) Order 2019 is important, and especially that information is relayed in a manner that is accessible to non-technical audiences. Unlike other areas of planning, there is no aggregation of need across local authority areas. Therefore, it is	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses the role of the Scheme in contributing to national net zero targets and related comments as part of its application. The significance of the Scheme is assessed against the national carbon budgets in the section 7.10 of the Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1] .

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		appropriate to place such development, especially nationally significant infrastructure, within a national context.		Specifically, in paragraphs 7.10.49 to 7.10.51, 7.10.72 and 7.10.87 to 7.10.89.
Wiltshire Council	Climate change and energy need	6.2. In tandem with the most recent NPPF, the UK Government published the Clean Power 2030 Action Plan. It is considered that it is worth highlighting two key infographics [See Page 10 of Technical Response PDF] within this publication because they detail the scale of challenge to decarbonise the UK's energy systems and sets out the energy mix it is anticipating, which includes a significant solar generation capacity growth and battery storage capacity growth. In common with all form of energy generation development, there is a degree of loss of energy through transmission.	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses these and related comments as part of its application.
Wiltshire Council	Climate change and energy need	6.3. Decarbonisation of the electricity grid is a key milestone towards net zero by 2050. Solar electricity generation and short-duration battery storage, as proposed here, are considered to be important parts of the future energy mix for UK energy security. In this context, this proposal could play an	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses these and related comments as part of its application.

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		important role in meeting the required deployment at the necessary sharply accelerated scale and pace anticipated by the UK Government		
Wiltshire Council	Climate change and energy need / Scheme description and DCO process (Planning)	6.6. The applicant sets out that the proposal will have a total electricity generating capacity exceeding 50MW and up to 500MW with 500MWh battery storage (Chapter 7 of the PEIR is written with the assumption of 500MW (= 0.5GW) electricity generation capacity). The applicant states that there is no limit on the generating capacity because the environmental effects are determined by the design parameters rather than capacity. Furthermore, as technology develops (at pace) greater capacity may be achieved within the same design parameters. However, whilst this approach is not considered to be unreasonable and the need for flexibility is respected, the council considers that the capacity figures need to be refined within the future ES. This would allow interested parties to have the	No	The assumptions for the Greenhouse Gas assessment are set out in the section 7.10 of the Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1] .

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		best information on the likely benefits of this scheme in climate change terms available.		
Wiltshire Council	Climate change and energy need	6.9. The WLC of the proposal is also compared to a baseline scenario that doesn't consider construction and decommissioning phases. As with most types of development, it is the construction phase, and to a lesser degree the decommissioning phase, that result in the greatest carbon emissions. As such, it is considered that the approach by the applicant in this work could underestimate the benefits of the scheme compared to the baseline. Furthermore, other assumptions in their baseline, such as, that the existing land-use (agricultural) will result in no carbon emissions are agreed – they will be conservative. In short, the council considers that for a variety of reasons the baseline carbon impacts are most likely understated in the PEIR.	Yes	The effects of emissions generated from embodied carbon within products to be used on site as well as construction, operation and decommissioning emissions are all considered in Environmental Statement (ES) Chapter 7: Climate Change EN010168/APP/6.1]. The CO₂e figures are included in detail within the ES chapter. Emissions from production of the required cables are included within the assessment. The chapter concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme contributing to decarbonisation of energy from the National Grid. Further, as outlined in the chapter, the emissions of replacing the solar panels, inclusive of the embodied carbon (manufacturing and transportation

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				emissions) are considered in the assessment. The DESNZ conversion factors, which were used for the assessment of embodied carbon, cover the extraction, primary processing, manufacture and transportation of materials. Baseline and future conditions are set in section 7.7 of the assessment. Although, it is expected there will be some baseline emissions from the Site's current use and some carbon sequestration from the grassland once the Scheme is in place, as a conservative approach, the baseline emissions and the grassland sequestration were considered zero.
Wiltshire Council	Climate change and energy need	Surveys / Further Assessment Required to be Completed: 4. It is acknowledged that the surveys and analysis work undertaken to date primarily relate to the solar panel sites. Significant survey and analysis work is yet to be undertaken in respect of the corridor route, which is required to fully assess the impacts of this scheme. 5. Council officers have identified the need	No	Section 8.2 of the Statement of Need [EN010168/APP/7.1] explains that the Scheme is able to carry a connection to the National Electricity Transmission System, and therefore the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County

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		for the following survey / further assessment work to be undertaken and urge IGP to complete this as soon as possible: a) The impact of the proposed development on the electricity needs and requirements for Wiltshire's planned growth.		Council's growth plans. Indeed, the Scheme will provide low carbon energy to support the demand growth associated with Wiltshire's planned growth.
Wiltshire Council	Air quality	Dust associated with Construction Impacts: 15.14 The Construction Dust Assessment and Methodology Assessment report references the Institute of Air Quality Management (IAQM) guidance for controlling construction dust and uses the best practice therein as proposed mitigation measures. 15.15 The risk to ecology and human health from dust generated has been assessed and the latter is referenced as low impact for dust from site earthworks, construction and vehicle track out. Higher risk ratings have been allocated to ecological receptors. 15.16 As a result of the risk to ecology, the applicant has recommended that the best	No	A construction dust assessment has been undertaken as part of the air quality assessment, and site specific mitigation measures have been proposed, where required. Please refer to Environmental Statement (ES) Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1] for further details. These measures have been incorporated into the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] submitted as part of the Development Consent Order (DCO) Application.

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		practice in the IAQM guidance be adopted throughout the project. The council requires the applicant to submit a site-specific Construction Management Statement to ensure appropriate dust suppression techniques are incorporated and implemented in full during construction works.		
Wiltshire Wildlife Trust	Ecology and biodiversity	Lime Down is a large scale renewable energy project, having the potential to displace local wildlife across a considerable area. Given that habitat destruction, fragmentation and climate change are all contributing to the current biodiversity crisis, it is vital to ensure projects of this scale are appropriately located and where at all feasible, contribute to the enhancement or creation of habitats to support biodiversity. The developers present a suitable level of evidence of current habitats, designations and species through their desk study, which included a data search from the WSBRC as well as other open-source datasets. We believe these checks to be thorough and in	No	Following the preliminary assessment work presented in the Preliminary Environmental Information Report (PEIR), the Ecology and Biodiversity assessment has now been completed and is documented within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The number of potentially significant adverse effects has reduced since the preliminary assessment presented at PEIR stage, with surveys now having been completed and the Scheme design and mitigation package having been finalised.

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		line with legal requirements at this stage. The Preliminary Environmental Information Report (PEIR) summarises significant residual effects of the development, remaining following the implementation of mitigation measures. The presence of potential significant long term adverse impacts on ecological receptors, some of which are at national or international level, is concerning. Further detail on these, and additional comments on the current documentation, are summarised below:		
Wiltshire Wildlife Trust	Ecology and biodiversity	Habitat and Connectivity The solar farm is located on mainly arable and pasture fields with a percentage of the project area allocated to environmental enhancement and buffer zones. Buffer zones of existing significant habitats such as ancient woodland have been included but does not account for the likely significant negative impacts of the panels to a range of commuting and foraging species, such as bats.	No	A detailed assessment of the potential impacts of the Scheme on ecology and biodiversity is set out in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The impacts of solar PV panels on foraging/commuting bats is poorly researched. A small number of recent studies have indicated that certain bat species may show reduced foraging behaviour in the presence of solar PV panels, although these studies have a

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		The solar development will result in the loss of agricultural land, with long-term adverse effects on Best and Most Versatile (BMV) agricultural land. This could have a negative impact on local food production, and result in a loss of rare plants and arable weeds through cessation of arable farming activities. Creation of species-rich grassland underneath the solar panels has been proposed. We question whether it is possible to achieve 'significant beneficial effect' from this. Research indicates that shading under solar panels creates a microclimate which can negatively impact plant and soil biodiversity, alongside increased soil compaction. In addition, hay cuts tend to be unfeasible and reliance on grazing falls to sheep which produce a mono-sward height and usually are insufficient in the development of a diverse grassland.		number of limitations and the reasons for these observations are unclear. Nevertheless, the Scheme has been designed with this preliminary research taken into consideration, with the most important habitats for foraging/commuting bats retained and protected with suitably wide buffers, following published guidance on protection of habitats for bats adopted in Wiltshire (namely the Trowbridge Bat Mitigation Strategy). The assessment concludes there will be no significant residual effects on bats. The Applicant recognises that there are concerns relating to the potential for the Scheme to impact upon agricultural food production. Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of

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				arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. This is considered in Environmental Statement (ES) Volume 1, Chapter 17: Soils and Agriculture and Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1].

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				Sheep grazing is not being relied upon for management of the grassland, The Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] sets out how cutting of grassland will be timed to take places after the main flowering period in order to encourage the establishment of a diverse sward. In terms of the loss of rare plants and arable weeds, there is provision of entire fields designated to be as set-aside, which will be regularly cultivated and managed for the duration of the Scheme, which will provide large areas with suitable conditions for notable arable weeds to thrive and persist within the Order Limits. These areas are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation [Plan EN010168/APP/6.2] and will be secured through prescribed measures within the Outline LEMP [EN010168/APP/7.18]. Additionally, the cessation of intensive arable farming practices (particularly herbicide spraying)

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				and reversion of the land to permanent grassland (for at least the duration of the Scheme) can be expected to result in an increase in the overall diversity of plant species within the Order Limits, and may facilitate the establishment of a number of notable species. The potential for a microclimate to be created by solar panels is extremely unlikely. An Outline LEMP [EN010168/APP/7.18] has been prepared which includes a framework for how the species-rich grassland will be established and managed in the long term. The aim of grassland establishment and maintenance will be to encourage development of a diverse sward of grasses and herbs. Ecological monitoring results from 124 operational solar developments, presented in Solar Habitat 2025 (published by Solar Energy UK) has shown how well-managed solar farms can result in the establishment of species-rich grassland and other important habitats which can benefit a wide

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				range of species
Wiltshire Wildlife Trust	Ecology and biodiversity	Watercourses and aquatic wildlife The development site is located approximately 24km from the Severn Estuary. We agree with the Environment Agency response that the Avon Bristol Rural Operational Catchment is hydrologically connected, therefore functionally linked, to the Severn Estuary Ramsar and SSSI, and there is potential for additional pollution impacts from the solar farm. In addition, despite the proposed shielding mitigation, the potential for electric and magnetic fields (EMF) at Grid Connection Cable crossings to negatively impact migrating eels and fish movement is of concern. The potential for additional habitat loss and fragmentation due to cable works and watercourse crossings is likely to adversely affect any associated riparian	No	A detailed assessment of the potential impacts of the Scheme on ecology and biodiversity is set out in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. This includes an assessment of the impact of EMF on migratory eels and sea trout which concludes no significant residual effects as the cables will be buried to a minimum depth of 5m below the channel, which is far greater than typical installation depths, to minimise the risk of adverse impacts. In terms of the impact of habitat loss and fragmentation due to cable works and watercourse crossings on riparian mammals and white-clawed crayfish, with the implementation of pre-works inspections and subsequent mitigation, to be secured via the Outline Ecological Protection and Mitigation Strategy

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		ecological receptors such as water vole and white clawed crayfish.		[EN010168/APP/7.19] no significant residual effects are predicted. From a hydrological perspective, the Scheme has been assessed within ES Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the accompanying Flood Risk Assessments and Drainage Strategies (Appendices 11-1 to 11-9) [EN010168/APP/6.3]. These confirm that watercourse crossings will be undertaken using trenchless techniques such as Horizontal Directional Drilling (HDD) for Main Rivers (e.g. Gauze Brook and Gabriel's Well) and open-cut only for minor drains where proportionate. This approach avoids disturbance to aquatic habitats, maintains hydrological connectivity, and ensures no deterioration in downstream water quality or flood risk. In addition, the Water Framework Directive Assessment [EN010168/APP/7.11] demonstrates that

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				the Avon Bristol Rural Operational Catchment is functionally linked to the Severn Estuary Ramsar and SSSI, and confirms that the Scheme will not result in deterioration of status or adverse effects on water-dependent designated sites.
Wiltshire Wildlife Trust	Ecology and biodiversity	Birds Whilst current research indicates that solar farms can be of benefit to some bird species if managed with biodiversity in mind, negative impacts have been recorded for species such as skylark and lapwing. Given that a possible 167 skylark breeding territories are specifically highlighted within the Lime Down PEIR, consideration must be given to the significant negative impact of this project on these populations. We question whether a suitable alternative site of the required scale to support displaced birds could be identified. There is additional risk of displacement of	No	A detailed assessment of the potential impacts of the Scheme on ecology and biodiversity is set out in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. This includes an assessment of the impact of the Scheme on birds, including skylark (lapwing were not recorded using the Order Limits during surveys), and sets out how mitigation will reduce significant effects, including how the design of the Scheme has included provision of entire fields designated as set-aside to provide suitable habitat for ground nesting birds (particularly skylark) for the lifetime of the Scheme. These areas are shown in ES Volume 2, Figure 3.4: Landscape and Ecology Mitigation Plan

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		overwintering and breeding birds from the solar PV sites, which could disrupt their current foraging and breeding behaviour and lead to adverse population effects.		[EN010168/APP/6.2]. The assessment present within the ES Chapter concludes there will be inevitable residual significant adverse effects at a Site to Local level for ground nesting birds as a result of displacement. No significant displacement impacts are expected for other breeding birds (i.e. non-ground nesting birds) or overwintering birds as a result of the Scheme.
Wiltshire Wildlife Trust	Ecology and biodiversity	Bats The current Cable Route Search Corridor (CRSC) passes through sensitive bat consultation zones (for Bath and Bradford-on-Avon Bats SAC), and in close proximity to core roost and buffer zones for lesser and greater horseshoe bats. The habitats surrounding the SAC would provide additional feeding and commuting resource for these highly mobile species, and other native bats, therefore any degradation or removal of such habitats within this functionally-linked landscape could have an adverse impact with a potentially	No	A detailed assessment of the potential impacts of the Scheme on ecology and biodiversity is set out in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. This includes an assessment of the impact of the Scheme on bats. As shown in ES Volume 3 Appendix 9.8: Schedule of Protective Ecological Buffers [EN010168/APP/6.3] buffer areas have been incorporated into the Scheme design to take account of foraging/commuting bats. A minimum offset

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		international scale of significance. Current research indicates that bat foraging behaviour can be negatively impacted by the presence of solar panels, both through reduction in the quality and scale of quality feeding habitat and also impeded orientation. We question whether the proposed buffer areas surrounding the solar farm sites are sufficient to offset the loss of existing foraging areas. Mitigation for damage or disturbance should accommodate 'lead in' time for any new planting to become effective. As per recommendations within the SAC, such features should be protected and managed in perpetuity, which is of additional concern with regards to possible future impacts from decommissioning activities listed at 60 years.		of 15m from all hedgerows, tree lines and woodlands has been incorporated into the Scheme. This is in accordance with minimum offsets from 'core bat habitat' for bats of the SAC, as advised and defined in Wiltshire Council's Trowbridge Bat Mitigation Strategy SPD which the respondent refers to. All new planting and habitat creation will be managed for the lifespan of the Scheme in accordance within the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18]. The Applicant cannot secure ongoing management of habitat in perpetuity following the end of the 60 year lifespan of the Scheme, as land at the Scheme is returned to the landowner, although at the decommissioning stage consideration will be given to retaining important habitats and features for wildlife that have established in according with relevant policy and legislative framework which exists at that time.

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Wiltshire Wildlife Trust	Ecology and biodiversity	Biodiversity Net Gain It is difficult to comment on the development's compliance with mandatory Biodiversity Net Gain without copies of the statutory metric to assess the level of impact/unit losses and gains. Habitats under BNG must currently be secured and managed/maintained for a minimum of 30 years, and often in perpetuity. The 60-year timeline of the project, with current proposals indicating decommissioning activities to revert the project area back to arable at the end of the project lifespan is of concern. More detail is required on supporting the longevity of habitats on site, and consideration into assessing final habitat classifications and associated condition prior to decommissioning activities. The production and appropriate review/consultation of associated Habitat Management and Monitoring Plans (HMMP) will be required to ensure all	No	As the Scheme is a National Significant Infrastructure Projects (NSIP), it is not yet mandatory to achieve 10% measurable Biodiversity Net Gain, with this requirement for NSIPs expected to be made mandatory for applications made from May 2026. Nevertheless, a BNG Assessment is provided in the Biodiversity Net Gain Assessment Report [EN010168/7.8] and Biodiversity Net Gain Assessment Statutory Biodiversity Metric Calculation [EN010168/7.9], both of which demonstrate the Scheme will achieve BNG of at least 10% in Habitat Unit, Hedgerow Units and Watercourse Units. Details of management plans for securing Biodiversity Net Gain and protecting and/or buffering impacts on important habitats surrounding the Scheme area are contained within Environmental Statement (ES) volume 3 Appendix 9.8: Schedule of Protective Ecological Buffers [EN010168/APP/6.3] as well as the Outline Landscape and Ecological

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		habitats are appropriately monitored and managed. This should be evaluated on release of the Environmental Statement (ES) after the consultation process. It appears that the developers are only aiming for a 10% net gain rather than the 20% as stated in the Wiltshire Draft Local Plan - Policy 89 by Wiltshire Council. We would like to see further detail on management plans for protecting and/or buffering impact on the important habitats surrounding the project area, for example ancient woodland blocks, and also ongoing monitoring schedules to assess the impact on protected species following project installation, and throughout the project lifespan. Due to the size of the documentation pack, and limited resources within the team, we have not been able to scrutinise and assess these proposals to the level of detail we would have liked. In addition, there are gaps in the current document pack relating		Management Plan (LEMP) [EN010168/APP/7.18] which sets out how the habitats will be secured and maintained/managed for the lifespan of the Scheme along with a comprehensive ecological monitoring schedule. The Outline LEMP [EN010168/APP/7.18] will achieve the purpose of a HMMP in terms of BNG habitat creation/establishment, and long-term management and monitoring. All retained and proposed newly created habitats are shown in ES Volume 2, Figure 3.4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. Please refer to ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] for details of the completed baseline survey reports.

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		to additional species surveys, BNG metric calculations, and management/monitoring proposals. The issues listed above are therefore the most apparent or 'headline' issues and are limited to the information currently available. We would anticipate further review of the issues raised as above, and to identify and raise further comment as and when more information becomes available in the coming months. As previously stated, Wiltshire Wildlife Trust supports the development of appropriate renewable energy projects, but only in the right place, being the right size and serving nature as well as the local community.		
Yatton Keynell Parish Council	Transport and access	Workforce Transport Little if any thought has been given to the adverse consequences of the need to transport the workforce during the 2 years of construction - There have been no alternative options	No	The capacity of local roads/infrastructure to accommodate construction vehicles is assessed in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] , This includes the assessment of workers. A worst case assumption has been made in relation to the distribution of workers

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		offered regarding modes of transport, the numbers presented have assumed 50/50 split between coach & private vehicles with a 100% load factor on a coach. It has also been assumed that the coaches will remain on site all day, these numbers are clearly optimistic and a truer picture should be presented with other scenarios modelled. - As there are no practical means of controlling routes that private vehicles will take to the construction sites, this raises serious concerns regarding road safety having regard to the suitability or otherwise of the local route network (C roads). This needs to be fully considered, modelled, risks assessed and mitigations proposed. - There has been no recognition of the traffic generated around transportation of school children, the 'no travel' period for construction workers should also cover both the morning and afternoon school travel period.		assuming they are all on the proposed construction routes, any other assumptions would dilute the trips over various routes and dilute any impact. The assumption that 50% of the workers will use the shuttle bus is robust given most workers will not be from the local area. The Applicant does not have control over the use of the railway network, nor the mentioned siding, and it is considered unfeasible to make deliveries to the Order Limits via the railway. The Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] includes a commitment to the provision of a shuttle bus to transport staff to site. A conservative assumption of 50% has been made regarding the number of construction workers using the shuttle bus, however, it is expected that this will be higher in reality due to the proportion of the workforce that will be staying in local accommodation from

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				which shuttle buses will run from/to. The shuttle bus routes will be controlled through the CTMP which will be prepared in substantial accordance with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). Private vehicle users associated with the Scheme will be advised of the construction vehicle routes and instructed to follow these. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised and will include measures to restrict HGV arrival and departure times to reduce any conflicts with peak commuter times and school drop-off/pick-up times. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. Some deliveries may be required outside of these hours, if unavoidable. Construction worker shifts will be scheduled so that workers are not traveling during the network peak hours of 08:00-09:00 and 17:00-18:00.

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Yatton Keynell Parish Council	Transport and access	No indication has been given regarding the nature of the plant and machinery required for constructing the cable run although it was indicated that where practicable, internal temporary road would be used for plant and construction vehicle movements. Nevertheless, some use of public roads cannot be ruled out. Therefore, for the avoidance of doubt we contend that the B4039 - The Street, is unsuitable for large construction vehicles. Grittleton Road (C86) from its junction with B4039 northwards through the village has a number of pinch points also making this route unsuitable. Access to the cable construction compounds for places north of the village should be from the north and avoid the village at all times.	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accordance with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised and will include measures such as the requirement for road condition/dilapidation survey. An AIL assessment has been undertaken of the routes to the substations and is presented in Annex D of the Outline

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				CTMP [EN010168/APP/7.22] . Outside of the identified construction vehicle routes, there will not be transport and access effects.
Yatton Keynell Parish Council	Scheme description and DCO process / IGP	Cable route The very idea of erecting an industrial scale solar park 20 kilometres from the grid connection point seems fundamentally flawed. This was raised with IGP and the only answer offered related either to the non-availability or unsuitability of land any closer. Both project timings, completion deadlines and cost suggest that this proposal must at the very limit of viability. Albeit on a much-reduced timeframe, that it requires the temporary acquisition of as much land for the cable run as for the panels and other infrastructure suggests this is an ill-conceived and possibly unsustainable plan with numerous critical factors remaining completely unknown.	No	The Applicant has followed a step-by-step site selection process which confirms the location of the Scheme and associated Cable Corridor is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Report [EN010168/APP/6.3]. For the Stage Two statutory consultation, the Applicant identified and invited feedback on an area of land (the Cable Route Search Corridor) which covered

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				approximately 1,947 ha of land within which the Cable Route Corridor would be sited. Details of the Cable Route Corridor (as refined for Development Consent Order (DCO) application submission) can be found in ES Volume 1 Chapter 2: The Order Limits [EN010168/APP/6.1]. More information regarding selection of the cable route corridor is contained within ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. In recognition of consultee interest in the Cable Route Search Corridor, the Applicant committed to providing updates on its proposals for the Scheme, including the Cable Route Search Corridor. On 03 June 2025, the Applicant published a Summer Newsletter on the Scheme website and issued this to the 14,000+ addresses located in the Core Consultation Zone. The Newsletter provided an update on the ongoing work being undertaken to refine the Cable Route Search Corridor as

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				presented at PEIR and introduced the Targeted Consultation on minor amendments to the development boundary area for the Scheme. This presented an opportunity for recipients to provide comments on the updates regarding the Cable Route Search Corridor should they have further feedback. The Summer Newsletter is provided in Consultation Report Appendix I-1: Targeted Consultation EN010168/APP/5.2].
Yatton Keynell Parish Council	Scheme description and DCO process / Cultural Heritage	Only the broadest indication of where the cable will be routed has been indicated. Consequently, no archaeological assessments have been undertaken.	No	The location of the Cable Route Corridor is shown within Environmental Statement (ES) Volume 2, Figure 2-1: Elements of the Site [EN010168/APP/6.2]. Please refer to ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] which assesses the impact of the Scheme on cultural heritage (including archaeology). As stated within this Chapter, in terms of archaeological field evaluation, geophysical surveys were undertaken within all areas of the Scheme that were suitable for survey

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				(for example, excluding roads and areas of woodland) and where land access was permitted. The results of the geophysical survey are provided in ES Volume 3, Appendix 12- 4: Archaeological Geophysical Survey Reports [EN010168/APP/6.3]. Geophysical survey on the cable route has been partially completed; it is intended for survey to be completed in autumn 2025 and the archaeological mitigation strategy will be updated accordingly. Evaluation trial trenching was undertaken to test the results of the geophysical survey. Interim reports detailing the results of the evaluation trial trenching are provided in ES Volume 3, Appendix 12- 5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3].
Yatton Keynell Parish Council	Scheme description and DCO process	Turning to the main areas of contention as they affect Yatton Keynell Calling the proposed development a 'Solar Park' is highly inappropriate. It is more	No	The Applicant disagrees that the naming of the Scheme is inappropriate. There is an important distinction between the term 'park' and 'solar park'. The latter is defined

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		accurately a patchwork of separate parcels of land widely spread across North Wiltshire.		by Collins dictionary as " <i>an area of land that has been set aside for the generation of solar energy</i> ". This term is commonly used within the solar industry with many other schemes named similarly.
Yatton Keynell Parish Council	Scheme description and DCO process	It is not an argument to say that the Lime Down application is for temporary permission. In planning terms it may be, but in reality it is for 60 years and for what amounts to 3 generations, the whole area will be blighted by solar panels.	No	The 60-year operational period is considered 'temporary' in nature given that, upon the lapse of the operational period, the Scheme is decommissioned thereby returning the landscape to its previous state; thus, giving the Scheme its temporariness.
Yatton Keynell Parish Council	Landscape and visual	Damage to the local landscape and implications for the Cotswold National Landscape (CNL) Whilst the panel areas lie outside the Cotswold National Landscape (CNL), they are close to the boundary and therefore the visual impairment looking both from and towards the CNL is highly significant.	No	The Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and Appendix 8.6 LVIA of the Special Qualities of the Cotswold National Landscape (CNL) includes an assessment of the impact of the Scheme on the CNL and the Special Qualities. The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and

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				restore and finally offset or, failing that, compensate in order to reduce development impacts and control any negative effects on the environment. Parcels within the setting of the CNL, on the boundary of the CNL have been removed from the scheme. Paragraph 189 of the NPPF is considered in the ES [EN010168/APP/6.1] has directed the design with the removal of all fields on the boundary of the CNL or within its immediate setting. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The CNL is fully assessed as its own standalone receptor in ES Volume 3,

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				Appendix 8.6: LVIA of Effects on the Special Qualities of the CNL [EN010168/APP/6.3]. It assesses the impacts of the proposal upon landscape character, visual amenity and the CNL's special qualities and addresses how the scheme seeks to further the purpose of the National Landscape's designation. Fields C2, C3 and C4 have been removed from the scheme entirely to avoid significant adverse landscape and visual effects on the CNL and its setting. Panels within C1, C6, C8, the western section of C9, and the majority of C10 have been removed and the land used for ecological mitigation to protect the setting of the CNL. Panels within fields A11 and A12 have been removed and the land used for ecological mitigation to protect the setting of the CNL towards Sherston. All fields on the edge of the CNL provide habitat enhancement to further the purpose of the CNL designation and have been informed by the CNL Management Plan

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				and the Cotswolds National Landscape (AONB) Landscape Strategy and Guidelines' In addition, a detailed assessment of the likely significance of effects from the Scheme on the use and desirability individual PRowS, tourism destinations such as the Cotswold National Landscape and Badminton Horse Trials, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations and events, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
Yatton Keynell Parish Council	Landscape and visual	This area of the CNL is defined as Dip Slope Lowland and the characteristics equally apply to the adjoining land. These characteristics will be lost by the industrialisation of the landscape with vast areas of monochrome solar panels and associated infrastructure.	No	The Applicant agrees with the area of the Cotswold National Landscape (CNL) being defined as Dip Slope Lowland. The effects of the Scheme are assessed in the Landscape and Visual Impact Assessment (LVIA) provided in Environmental Statement (ES) Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1]. The LVIA has assessed effects of the Scheme on landscape character extending out to a 5km Study Area, and to 10km for potential cumulative effects. The effects on the Special Qualities of the Cotswold National Landscape are also assessed in ES Volume 3: Appendix 8-6-Assessment of Effects on the Special Qualities of the CNL [EN010168/APP/6.3]. This Assessment found that as a result of the Scheme, the Special Qualities of the CNL would not be adversely effected, and that there would be opportunity to provide benefit to further the purpose of the CNL.

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Yatton Keynell Parish Council	Landscape and visual	The need to screen these structures (which for the larger 4.5m high structures is highly doubtful) will fundamentally change the characteristics of the area renowned for its scenic beauty and therefore popular with tourists whose patronage supports and sustains a range of local leisure related businesses. No thought has been given by IGP to the potential for long lasting damage to the local economy should Lime Down be developed.	No	The landscape and visual effects of the scheme are assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1]. Mitigation measures have been incorporated into the Scheme to reduce adverse effects. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline LEMP [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. A detailed assessment of the likely significance of effects from all stages of the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Scheme, from construction to decommissioning, on individual PRoW, tourism destinations, recreational features, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme.
Yatton Keynell Parish Council	Cumulative Effects	Furthermore, and it is important to realise, that many local residents will be constantly passing close by solar parks just going about their daily business with a 49.9 MW solar park to be built between Sevington & Leigh Delamere and a further 40 MW solar	No	The cumulative impact of the Scheme along with other proposed developments (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21:

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		park at Kington St Michael/Kington Langley. There is an existing solar park at nearby Corston along with smaller ones at Battens Farm, Allington and Castle Combe Circuit. A second solar park at Battens Farm is under consideration. It is noted that the Kington St Michael/Kington Langley site known as Red Barn has, we believe, been erroneously excluded from the analysis (PEIR Volume 3 Appendix 21.1 – Long List of Cumulative Schemes Line 243 Page 73).		Cumulative and In-Combination Effects [EN010168/APP/6.1]. In terms of the Schemes mentioned, the Applicant confirms that Red Barn Solar Farm, Battens Solar Farm and Leigh Delamere Solar Farm were included in the shortlist and have been assessed in ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. The Applicant notes that Red Barn Solar Farm was only presented on the long list of cumulative schemes at Preliminary Environmental Information Report (PEIR) and agrees that this should have been carried across to the short list. As mentioned above this has now been rectified within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. Castle Combe Solar PV Park was considered in ES Volume 3, Appendix 21-

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				1: Long List of Cumulative Developments [EN010168/APP/6.3] but was not taken forward to the shortlist. Allington solar farm was included in the long list but was not considered within the short list as it has already been constructed and will therefore form part of the baseline assessed within the technical chapters of the ES [EN010168/APP/6.1]. The Statement of Need [EN010168/APP/7.1] describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20).

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Yatton Keynell Parish Council	Cultural Heritage / Transport and access	Yatton Keynell Parish Council Submission to Lime Down Solar Park Statutory Consultation March 2025 Yatton Keynell Parish Council represents the village of Yatton Keynell as well as the settlements of Tiddleywink & Broomfield. The centre of the village is in a conservation area within which there are numerous listed buildings. On the B4039 (The Street), which passes through the centre of the village, there is a Primary School whose pupils travel by car and bus from a wide area and a doctors' surgery which also attracts private vehicle movements and parking issues. The proposed cable route corridor passes to the immediate east of Yatton Keynell.	No	It is not proposed to route construction vehicles through the centre of Yatton Keynell. Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [E N010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accordance with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Regarding schools and facilities, the CTMP includes restricted deliveries outside of

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				peak hours. However, an assessment on safety and accidents is provided in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] . Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area.
Yatton Keynell Parish Council	Cultural Heritage	It is known, or can be inferred, from the results of the Leigh Delamere (Eden Renewables) application that the cable search corridor crosses several known areas of significant archaeological interest. A comprehensive survey will be required and any resulting restrictions fully enforced.	No	Assessment of the cable route corridor undertaken within the Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] , supported by appendices in ES Volume 3 (12.1 to 12.7) [EN010168/APP/6.3]
Yatton Keynell Parish Council	Consultation and engagement	Councillors attended the consultation events and have also received feedback from residents. There was widespread disappointment at the standard of the information presented. In the hierarchy of knowledge, what was offered although abundant, was mostly unrefined data of low	No	The Applicant's pre-application consultation is described and evidenced in the Consultation Report [EN010168/AP/5.1] . Through consultation, the Applicant has prepared and published a range of consultation materials available in a various

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		value. Furthermore, the knowledge of staff present, who were either unable or unwilling to answer questions. It was also recorded that contradictory answers to questions (e.g. surface water drainage and flooding) were forthcoming from different representatives of Island Green Power (IGP).		formats to cater for differing preferences and levels of interest and expertise. For example, this includes: a Preliminary Environmental Information Report (PEIR); a Non-Technical Summary of the PEIR; Community Consultation Leaflet; and a Feedback Form. A Document Navigation Booklet was published to assist with the review of community consultation literature and technical documents. This document is available online, and was available to view and take away from Community Access Points (CAPs) and in-person information events. The Applicant then published an Environmental Statement (ES) [EN010168/APP/6.1] which presents updated information as part of the Development Consent Order (DCO) Application.

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Yatton Keynell Parish Council	Consultation and Engagement	Conclusion - - Information presented on the website is very poorly presented and resembles a datadump rather than a source of information. - The Parish Council are fully supportive of the stance taken by Wiltshire Council's Cabinet on 4th March both with the unanimous vote against the project and the public rebuke issued to IGP for failing to attend the meeting. - Consultation events were poor as the data presentation was weak, with a lot of missing or incomplete information and poorly briefed staff. - Secondary Consultation, we strongly urge you to run a further consultation when you are in a better position to present the full picture of the long-term harm & destruction that you will be inflicting on this area of the Cotswolds. We will be writing to our Member of Parliament asking for her	No	The Applicant's pre-application consultation is described and evidenced in the Consultation Report [EN010168/AP/5.1]. Through consultation, the Applicant has prepared and published a range of consultation materials available in a various formats to cater for differing preferences and levels of interest and expertise. For example, this includes: a Preliminary Environmental Information Report (PEIR); a Non-Technical Summary of the PEIR; Community Consultation Leaflet; and a Feedback Form. A Document Navigation Booklet was published to assist with the review of community consultation literature and technical documents. This document is available online, and was available to view and take away from Community Access Points (CAPs) and in-person information events. The Applicant also maintained a range of

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		support in this matter. - Yatton Keynell Parish Council will continue to object to this project in the strongest possible terms.		free-to-use communication channels (Freephone, Freepost and email) throughout the pre-application period, and these continue to remain operational. The Applicant notes the Parish Council's support for the stance taken by Wiltshire Council's Cabinet on the 4th March. The Applicant has undertaken a series of defined stages of consultation during the preapplication period, to allow for iterative involvement, engagement and feedback throughout the development of proposals. This included a non-statutory phase one consultation on early-stage proposals, which ran for just over six weeks from Thursday 14 March to Friday 26 April 2024. The Applicant's strategy of undertaking an iterative consultation process has allowed for feedback to inform the development of the Scheme in a timely manner, including reporting back to consultees at an interim stage. Further details on the Stage One

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				non-statutory consultation are available in Consultation Report Chapter 4: Non-statutory consultation [EN010168/APP/5.1] The Applicant has actively sought and taken due regard to feedback provided by stakeholders on its approach to community consultation. The Applicant has complied with commitments made in its Statement of Community Consultation, which was informed through consultation with relevant local authorities. Consultation responses to each stage of consultation have been carefully documented and considered as part of the iterative development of the Scheme, with stakeholders playing a key role in the design of the proposals. A summary of the feedback to the Stage One non-statutory consultation and the Applicant's response is provided in Appendix B [EN010168/APP/5.2]. Feedback received during the statutory consultation under Section 47 is

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				summarised in Appendix E , while feedback from prescribed consultees under Section 42 is detailed in Appendix F . Feedback received during the targeted consultation and the Applicant's response is provided in Appendix H .
Network Rail	Project description and DCO process	This letter sets out Network Rail Infrastructure Limited's ("Network Rail") response to the consultation under section 42 of the Planning Act 2008 in respect of the Proposed DCO. In summary, the Proposed DCO, seeks consent for the construction, operation, maintenance and decommission of a solar photovoltaic (PV) generating station and associated development comprising of up to 500MWh Battery Energy Storage System, grid connection infrastructure and other infrastructure integral to the construction, operation and decommissioning phases including Grid Connection Cables to connect the Solar PV sites to the National Grid at the existing Melksham Substation.	No	The Applicant makes note of this comment.

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		Background to Network Rail Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain pursuant to its network licence. Under the terms of that licence Network Rail is under a duty to secure the operation, maintenance, renewal and enhancement of the network in order to satisfy the reasonable requirements of customers and funders. Therefore, any proposed development which is in close proximity to the railway or could potentially affect Network Rail's land interests, need to be carefully considered. The following aspects of the Proposed DCO are of particular interest to Network Rail due to the interface with, and potential impact on, railway infrastructure: • Cable Route Corridor – Underground cables affecting NR land and infrastructure. • Site Access Via NR infrastructure – Construction traffic and maintenance • Fencing and Security of the railway • Freight • Fire Safety		

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		• Drainage		
Network Rail	Project description and DCO process	Principle of the development The principle of development is acceptable subject to appropriate agreements being in put in place to protect NR's railway undertaking, but the form currently proposed, does not include appropriate mitigation measures and safeguards to ensure the safe and efficient continued operation of the rail network.	No	The Applicant is in discussions with Network Rail, in regards to obtaining the appropriate agreements for the Scheme, where the Scheme would interact with Network Rail's assets. The Applicant is in discussions with Network Rail regarding Protective Provisions.
Network Rail	General	Impact on Network Rail Infrastructure Freight Network Rail previously highlighted the need to extend the down freight loop at Hullavington, which seems to be within the development area. Whilst there are currently no proposals in place for how this would be implemented, should the proposals look to develop right up to the current rail boundary at this location, this could hinder future freight expansion.		The Applicant confirms that direct development is not intended to abut Network Rail's boundary, with the main interaction being the laying of cables underground using trenchless solution methods. The Applicant welcomes further engagement regarding any proposals for the implementation of a down freight loop and would seek to provide input and support where appropriate The Applicant confirms development would not abut Network
Network Rail	Cable Route	Underground Cable Route The proposed cable route corridor, as outlined in Chapter	No	The Applicant is in discussions with Network Rail regarding the necessary

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		3 of the PEIR, may have implications for Network Rail land and infrastructure. It is imperative that the routing of underground cables avoids any adverse impact on railway infrastructure, including embankments, bridges, and drainage systems. Network Rail requires further clarification on: • The precise alignment of underground cables in relation to railway assets. • Methods of cable installation near Network Rail land to prevent potential subsidence or structural issues. • Safeguards to ensure access to Network Rail assets is maintained throughout construction and operation. We request that detailed design and construction methodologies be submitted for review as part of the Asset Protection Agreement process.		crossing agreements and the proposed crossing methodologies. The applicant will provide the required design and construction details during the Asset Protection Agreement process.
Network Rail	Transport and Access	Site Access	No	None of the proposed construction routes pass over any level crossings so they are

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		The Transport and Access Report (Chapter 13 of the PEIR) identifies key construction traffic routes that could intersect or run adjacent to railway infrastructure. The following concerns should be addressed: • Assessment of potential impacts on level crossings, particularly if construction traffic increases usage. • Adequate planning for any required temporary access points or modifications near railway land. • Measures to mitigate disruption to railway operations, including traffic management plans and scheduling considerations to avoid peak railway operations.		not impacted. The construction routes have been derived to avoid any low or narrow Network Rail bridges Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accordance with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on highway and Network Rail infrastructure is minimised.

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Network Rail	General	Fencing The construction and operation of the Lime Down Solar Park must ensure that railway boundaries remain secure. The applicant should reinstate or upgrade fencing where necessary adjacent to the railway to prevent unauthorised access to railway land.	No	The Applicant is in discussions with Network Rail to agree protective provisions, this will ensure Network Rail's assets are not compromised during construction and operation.
Network Rail		Fire Safety Given the presence of Battery Energy Storage Systems (BESS) within the proposed development, it is essential that robust fire safety measures are in place to prevent potential OFFICIAL hazards to railway operations. The design incorporates safe setbacks from railway land to prevent any risks associated with thermal runaway incidents.	No	The Applicant confirms that the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.2.] and plume study BESS Fire Emissions Modelling Report [EN010168/APP/6.3] has been prepared and is submitted as part of the Development Consent Order (DCO) application to ensure that there are no significant off-site impacts if a BESS failure event occurs. The plume study in line with NFCC guidance considers both fire emission impacts and visibility impact on sensitive receptors within a 1km radius of the BESS area. The Outline BSMP

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				[EN010168/APP/7.2.] incorporates the latest NFCC Guidance and safety requirements from the NFPA 855 (2026 revision) standard, the Applicant will ensure that all safety requests and requirements set out by Dorset and Wiltshire Fire and Rescue (D&WFRS) are accommodated and fully agreed. Section 6 of the Outline BSMP [EN010168/APP/7.2.] documents the pre-construction information requirements that must be provided before construction can commence. The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to decommissioning. At the detailed design stage, the selected BESS design will have undertaken Large Scale Fire Testing to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.

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				The Applicant will demonstrate through comprehensive test data and consequence modelling that the buffer zone from the BESS area location in relation to Network Rail infrastructure and assets is sufficient to ensure that there are no significant off-site hazards for Network Rail operations assets.
Network Rail	Hydrology, Flood Risk and Drainage	Drainage and Flood Risk Management Network Rail notes that the development includes substations and associated drainage infrastructure, which may impact railway land. Network Rail requests that the promoter provide further information on the following: • Drainage at Site C1 - More information is required regarding the proposed drainage relating to the 132KV substation adjacent to the railway at this site. This includes details relating to surface water runoff.	No	The proposed 132 kV substation adjacent to the railway at Site C1 has been assessed in the Flood Risk Assessment and Drainage Strategy – Lime Down C1 [EN010168/APP/6.3]. Surface water runoff from the substation will be managed within a sealed drainage system, designed to accommodate the 1 in 100 year rainfall event plus climate change, with discharges restricted to greenfield runoff rates in accordance with Wiltshire Council and Environment Agency requirements. The system discharges to existing land drains which form part of the established catchment. Where those land drains pass beneath or in proximity to Network Rail land, the effect will be no different to the

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				current situation, as the Scheme will not increase flow rates, volumes or pollutant loading beyond existing greenfield conditions. Construction-phase drainage and pollution controls are set out in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], ensuring no uncontrolled runoff occurs adjacent to the railway during works. Detailed drainage designs will be prepared at the next design stage and submitted for approval under Requirement of the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. The Applicant will engage with Network Rail on the detailed drainage proposals to ensure their asset protection requirements are fully addressed, and long-term maintenance of the drainage system will be secured to ensure continued performance.
Network Rail	General	Asset Protection implications It is essential to the safe and efficient operation of the railway network that Network Rail's assets	No	The Applicant is in discussions with Network Rail to agree protective provisions, this will ensure Network Rail's assets are

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		are appropriately protected during both the construction and operational phases. An initial review by our Asset Protection Team has highlighted the need for the following assessments to be carried out in order for NR to determine the impact of the proposals. In order for Network Rail to assess the impacts on the railway, you will need to enter into an Asset Protection Agreement before proceeding with any design or development / construction or alterations to the site. The Asset Protection process will also identify any further site-specific safety requirements, provide engineering technical approval and detailed conditions. To start the process, please contact our Asset Protection Team via AssetProtectionWestern@networkrail.co.uk The process for obtaining approval is outlined on Network Rail's web page https://www.networkrail.co.uk/running-the-		not compromised during construction and operation. The Applicant has entered into a Basic Asset Protection Agreement with Network Rail in order to discuss and assess a particular interaction of the project with Network Rail along the cable route. A site visit has been undertaken and the Applicant has applied for a permit to investigate the interaction further to determine the potential impacts and possibility of using a Network Rail asset along the cable route.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		railway/looking-after-the-railway/asset-protectionand-optimisation/		
Network Rail	General	Clearance Clearance is an internal Network Rail procedure whereby relevant business units/stakeholders are consulted to ascertain whether there are any internal business or technical objections to what is being proposed. The clearance process looks at the both the impact of the proposed development and works and also any proposed land disposals. Any disposals by Network Rail of any interests in land are, in addition to going through Network Rail's clearance process, subject to regulatory consents/approvals.	No	The Applicant notes the comment and is progressing through the clearance process for each possible interaction with Network Rail.
Network Rail	General	Protective Provision Network Rail has standard form of protective provisions which will need to be included in the submission form of the DCO. A copy of the template protective provisions is enclosed. [We have not had the benefit of seeing the	No	The Applicant is seeking discussions with Network Rail regarding Protective Provisions at each possible interaction with Network Rail Protective provisions are proposed within the Development Consent

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		DCO drafting, and these will need to be amended to incorporate appropriate cross-references to the DCO provisions.] Network Rail would like to ensure that that submitted form of DCO includes an agreed form of protective provisions. Should you wish to discuss these, or any other agreements that will need to be entered into with Network Rail please contact [REDACTED]@networkrail.co.uk).		Order (DCO) and discussions will continue to ensure agreement is reached.
Network Rail	General	Overall In addition to the agreements referred to in this letter further agreements may need to be entered into. The details of any further agreements will be reviewed further once details of the scheme have been discussed. Should the DCO be granted a number of conditions will be imposed by Network Rail. Prior to any works commencing engagement will be required with asset protection who will manage the interface with NR assets. Thank you for providing Network Rail with the opportunity to comment on this consultation. I trust that the comments above are clear, should you require any	No	The Applicant notes this comment and acknowledges that further agreements may be required as the scheme progresses. The Applicant is committed to continuing engagement with Network Rail to understand and address any relevant interface issues, including those relating to asset protection. Any conditions or requirements set out following a grant of the Development Consent Order (DCO) will be considered in due course and addressed through the appropriate mechanisms.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		further information please do not hesitate to contact me.		

2 Section 44 Applicant Response Table

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_018	Cultural heritage	Could the recording of the session on Tuesday please be emailed to me. I noted the call was recorded and attended the session, but would like to listen back if at all possible ? I am co-owner of a property called [REDACTED] which is in [REDACTED]. The other co-owner is [REDACTED] (cc'd). The property is located in the conservation area of Sevington and is Grade II listed. Having looked at the Stage 2 consultation documents, I found the map of the cable route search corridor below. I understand the exact cable corridor is yet to be finalised but is likely to be close to Sevington. EN010168_LDSP_PEIR_V2_Fig8-1-6_StudyArea_CableRouteSearchCorridor.pdf Having looked at the above map, I believe the conservation area of Sevington is excluded from the cable route search corridor. However, the "hashed area" which denotes the cable route search corridor does seem to include half of the back garden of Sevington Hall and most of the	No	The proposed Cable Route Corridor is located over 200m to the north and 350m to the west of the Sevington Conservation area, in which the two mentioned Listed Buildings are located. No impacts have been identified to the Conservation Area or the Listed Buildings located within it. Any impacts to the setting of built heritage assets as a result of the cable route would occur during the construction phase and be of a temporary nature.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		back garden of [REDACTED] (the next door property to [REDACTED] Is this intentional or potentially an error? The garden of both these properties (C3 Dwelling house use case) extends to the north to a property boundary marked by a bank of mature trees which is known as Willow Copse (and which can clearly be seen on the above map). The garden for [REDACTED] (very likely in the hashed area) also contains a septic tank with underground drainage and pipes servicing 4 properties within Sevington conservation area. I had understood from the call there wasn't intent to take cabling through conservation areas, areas including heritage assets (which I assume includes listed buildings), and domestic property. The call on Tuesday indicated that agricultural land, non-domestic land e.g. rail land, public land would be used. As a result, I'm a little confused by the Cable Route Search Area extending into the properties at [REDACTED] [REDACTED] Could you please clarify :- Where cabling is likely to be sited vis-à-vis Sevington ?		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Whether there is any intent to route cabling through domestic property – specifically Sevington Hall and Manor Barn? Whether the above linked to plan is incorrect and if so, whether it will be amended ?		
LD2_CLE_008	Other Environmental Matters	Regarding the above Referenced Planning Application. We confirm that our client's High-Pressure Oil Pipeline Apparatus will be affected by the application as indicated in the attached plan(s) and we must therefore OBJECT for the following key reasons: • The application has the potential to contravene Exolum's ability to Safely access and maintain its assets under their legal rights as set out in Part IV of The Energy Act 2013, and • Due to the potential for breach(s) of the Health & Safety at Work Act 1974 with specific concerns around Regulation 15 of the Pipeline Safety Regulations 1996 and the potential for any subsequent work close to the High-Pressure Pipeline to impact both the Safety of the pipeline and those doing the work. We note in this specific case: 1. Protective provisions are required. It is therefore critical that all Construction and Design work affecting a High-Pressure Pipeline is discussed and agreed with	No	The Applicant makes note of this comment. Appropriate protective provisions are in discussion and will be included within the Development Consent Order (DCO).

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Exolum before the objection can removed and before any work on site. NOTE: The location plan(s) supplied are intended for general guidance only and should not be relied upon for detailed design, excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided in the plans and to verify the true location of the High-Pressure Pipeline at site contact MUST be made with Exolum to arrange a site visit.		
LD2_FFD_472	Project Description and DCO Process / Soils and agriculture / Landscape and visual / Ecology and biodiversity / Community benefits and impact	Q4 [overall comments] - My main focus is on the village of Rodbourne (Lime Down E) which is the area I am very familiar with. I am a tenant farmer currently renting approximately 85 acres of land (E32, E33, E34) earmarked for the solar park. It has been listed as grade 2 land but more importantly it is land that keeps my farm viable. Consistently over the 100+ years that my family have farmed this land, these fields have been the best providers. The ability to grow decent crops of cereals for both grain and straw are essential when running a mixed farming enterprise. Most of the farm is best suited to growing grass for grazing and fodder, but in order to house the animals over winter we need to be able to produce our own straw and feed to remain a viable business. I also supply other local farms with straw and feed. To take away the ability of a	No	Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This will be a requirement of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the DCO. The Applicant confirms that land agreements are being made with landowners who have their own contractual arrangements with tenant farmers. This may therefore involve the termination of agricultural tenancies at the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		village to remain virtually self-sufficient in all its agricultural needs seems ludicrous when food production on a local level is so very important. Q7 [comments on the assessment of potential effects / Landscape] - The scale and scope of the project will have hugely detrimental effect on the landscape. The countryside around here is beautiful because of the farmed landscape and the open views. To try and hide these oversized panels with trees and hedges will take years and will forever change the very landscape we want to protect. Rodbourn is a special area. It is part of an important green lung between the M4 and the A429. There is a creeping industrialisation from Junction 17 of the M4 and along the A429 towards Malmesbury. We must preserve open countryside between these areas, not add to it. Q8 [comments on the assessment of potential effects / Ecology] - There are going to be no benefits to wildlife through this scheme. Concentrating on fields E32,E33 and E34 in Lime Down E I can just convey what I see when working the land. The open large fields are a playground for hares who		discretion of the landowner. The Applicant is however cognisant of the impact this may have and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20] by way of requirement in the Draft DCO [EN010168/APP/3.1]. The landscape and visual impact of the Scheme is fully assessed in the LVIA - Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . Specific mitigation measures and enhancement plans are included in the Environmental Statement (ES). The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] A full assessment of impacts on ecology is provided in ES Volume 1, Chapter 9:

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		thrive up there. Corn buntings nest in the arable crops each year, appreciating the dense cover when the crops are growing at pace in the late spring. Hundreds of swifts, house martins and swallows swoop over the cultivated fields in late summer harvesting all the insect life. These fields already have good hedgerows and wildlife corridors. The fields are part of SFI agreements where there are no insecticides used, there are grass margins around the edges of the arable fields and there are management agreements to cut the hedges only every 3 years. The wildlife and biodiversity benefits are already in place. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - However the scheme is dressed up it will have a huge impact of the local area. The roads are small enough anyway getting to the villages you would need to get to. Totally inappropriate infrastructure to deal with the amount of site traffic. Q12 [suggestions for on-site community benefits] - The only way our local community will benefit is if this scheme is removed from Rodbourne. The beauty of the area is the		Ecology and Biodiversity [EN010168/APP/6.1] It is recognised that, generally-speaking, Lime Down E is of higher value for some ecological features in comparison to the other Solar PV Sites, given the typically smaller, more enclosed fields and less-intensive management practices evident compared to elsewhere at the Scheme, as well as the presence of designated sites for nature conservation in close proximity to Lime Down E. However, the scheme is expected to deliver ecological benefits both across the Solar PV Sites as a whole and at Lime Down E, through a range of habitat creation and enhancement measures, which are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2]. With reference to Lime Down E specifically, this includes considerable grassland and woodland creation, which has been designed to better complement habitat found within nearby designated sites (and species present therein) in comparison to existing arable land. An Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] has been prepared

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		only thing we want to protect. Your ideas of wildflower meadows are all well and good but the land in Rodbourne doesn't lend itself to wild flowers. As a whole the land is too rich, wet and heavy. They may grow for a year or two but it will be a costly, management heavy process to have any sort of success. Q13 [suggestions for off-site community benefits] - The only community asset that is important to Rodbourne is the health of the church. By all means give money to the church. The damage to the mental health and wellbeing of the community in Rodbourne has already been done. It is tragic that so much heartache is caused by a scheme that has no benefit to anyone in the community apart from 1 single landowner. Q14 [Additional comments] - I will never believe that this is an appropriate scheme for the area. The disregard for the effect on local communities and landscape is staggering. Once this land has been developed it will remain so for ever. No one is ever going to grow food in these fields ever again, regardless of what is said by the		to set out how retained and newly created habitat will be monitored and managed through the lifespan of the Scheme to maximise benefits to biodiversity. The Applicant acknowledges that adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The Community Benefit Fund is not required to mitigate the impacts of the Scheme and is therefore not intended to offset the environmental impact. This is dealt with in the technical chapters and need case. The Community Benefit Fund is meant as a means to recognise local community needs that the Scheme cannot meet but that the Applicant wants to be able to contribute towards. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		developers. The scheme is sad, misguided and ill judged. One can only hope that our cherished landscape will not be the victim in the pursuit of "greener" electricity. There's nothing green about it.		Scheme on a broad range of determinants of health, with mental health aspects to them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. National Policy Statement EN-3 Paras 2.10.24 & 2.10.25 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSS. This point is expanded upon in the Statement of Need [EN010168/APP/7.1] in particular in Section 4.3. Chapter 8 of the Statement of Need provides evidence to support the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. As stated in ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] all land will be returned to its original use and condition as far as is practicable and returned to the landowner. An Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] has been submitted as part of the DCO Application.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_212	Project description and DCO process	I wish to make a clear statement that the proposed scheme is too big and covers too large an area; that the construction period and collateral damage have not been properly assessed nor warranted. Pig lane and Farleaze farm are in the direct line of the cable route and there is no undertaking to recompense the planned impact on the properties in the vicinity. I am not opposed to Solar on Agricultural land in selected sites and to supplement agricultural income but the disproportionality of this scheme will completely dominate the economics of the area around the 4 villages particularly during construction. That cost will fall on the community and the local infrastructure.	No	The Applicant makes note of this comment. Since Stage Two consultation and the targeted consultation, the Applicant has undertaken further refinement of the Scheme design in line with the iterative design process. This has resulted in a number of reductions to the Scheme boundary, as set out in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Notable removals of land from the Solar PV sites following statutory consultation are listed in that chapter, with all removals shown on ES Volume 2, Figure 4-2 and Figures 4-2-1 to 4-2-8 [EN010168/APP/6.2]. As a result, the total area of the Solar PV Sites (excluding the Cable Route Corridor) has reduced to 749 ha (from 878 ha at PEIR), while the Cable Route Corridor has been reduced from the larger Cable Route Search Corridor presented at PEIR to cover 462 ha (from 1,947 ha at PEIR). The Applicant has undertaken a comprehensive assessment of potential impacts, including environmental, social, and economic, as part of the Environmental Impact Assessment (EIA)

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				process. The potential impacts of the Scheme are fully assessed in the ES [EN010168/APP/6.1] submitted with the Development Consent Order (DCO) application. This assessment considers all phases of the Scheme, including construction, operation, and decommissioning. It identifies potential effects and outlines appropriate measures to avoid, reduce, or mitigate impacts where necessary. The design of the Scheme has been informed by this assessment process, as well as by feedback received during both non-statutory, statutory and targeted consultations. Any likely significant effects of the Scheme during the construction period have been identified and set out within the ES [EN010168/APP/6.1] alongside appropriate mitigation measures. Mitigation measures are contained within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. A detailed assessment of the likely significance of effects of the Scheme on employment and the economy has been

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] . This assessment considers the impact on construction and engineering, agriculture, and potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme.
LD2_FFD_912	Project description and DCO Process	We have submitted a letter via your consultation email address. The letter is from Osborne Clarke on behalf of Bloor Homes Limited and dated 17 March 2025. Bloor's primary concern relates to the cable corridor which includes a significant portion of land which it is promoting for allocation in a development plan.	No	Comment noted.
LD2_CLE_445	Project description and DCO Process	Proposal: Lime Down Solar Park & Battery Energy Storage System (the Project) Representation to consultation by: Bloor Homes Limited (Bloor) and relevant landowners We act on behalf of Bloor who have an interest in land within the proposed Order Limits of the Project. Bloor are a housebuilder company responsible for helping England meet its commitment to build 1.5 million new homes over the next	No.	The Cable Corridor Search Area was initially developed through a desktop optioneering study, which identified a large area within which the Grid Connection Cables could be routed. Through the Applicant's land referencing process it was identified Bloor Homes had an interest in land within the initial and broad Cable Corridor Search Area options. The Applicant met with representatives from Bloor Homes on 31 January 2025 to discuss how both developments could coexist within the Cable Route Search

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		parliament. Robert Webb Developments represent [REDACTED] [REDACTED] being the landowners of the same land in which Bloor is interested. This letter should be treated as a join submission by both parties. Please direct correspondence to Osborne Clarke who will share this with both parties unless you are notified otherwise, but note that the parties are separately represented by Osborne Clarke and Robert Webb Developments respectively. We understand that the Project is a Nationally Significant Infrastructure Project and will comprise of a solar and battery energy storage system with a generating capacity of up to 500MW. Bloor have been promoting land to the West of Chippenham (west of the A420 and north of the A4 outlined in red on the attached plan) within HM Land Registry title numbers WT268181, WT298897 and WT417592 (the "Land") since entering into a promotion and option agreement dated 6 July 2018 for allocation for housing in the development plan. The Land was identified as available and suitable for development in response to		Corridor options presented during stage one consultation. As a direct result of consultation with Bloor Homes, the Applicant included additional land in the 1,947 ha Cable Route Search Corridor presented in the PEIR during stage two consultation to be able to avoid Bloor Homes' interest in land west of the A420 and north of the A4. A second meeting was held with the Applicant and Bloor Homes on 15 May 2025. Following a review of stage two consultation feedback received, the Applicant was able to advise Bloor Homes the emerging preferred cable corridor within the Cable Search Route Corridor presented in the PEIR had been refined and was sited outside of land where Bloor Homes had an interest. The Applicant confirms the Order Limits are 50m wide, save for instances where it is necessary to be wider owing to engineering and technical constraints. Therefore, the Applicant does not consider Bloor Homes to be impacted by the Order Limits.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Wiltshire Council's "Call for Sites". Island Green Power UK Limited ("IGP") has included a significant portion of the Land within the Order Limits of the Project with a view to this being the cable corridor for the electrical cable connecting the Project to the grid. On 7 January 2025, Bloor submitted a representation to IGP relating to the Project and its potential impact on the Land and the future delivery of housing (the "January Letter"). For the avoidance of doubt, their interests and position relating to the Project remain the same. Following the submission of the January Letter Bloor, the owner's of the Land and their agent met with IGP on 31st January 2025 to further discuss the Order Limits and how this corresponds with its plans for the future development of the Land. During this meeting, we understand that a narrower cable corridor illustration was shared which would avoid that part of the Land on which houses and associated infrastructure are likely to be built. Despite the revisions discussed on 31 January 2025, the Location Map which is the		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		subject of IGP's current consultation depicts a confluence of the corridors comprising a substantial portion of the Land. The cable corridor is over 200 metre wide (see https://www.limedownsolar.co.uk/project) and well in excess of the width of a cable corridor reasonably required for placing the electrical cable or any reasonable search area at this stage in the application process. This is not an early iteration of the Order Limits and IGP has indicated to the Planning Inspectorate that its application is due to be submitted in the next six months. Consequently, the extent of land required for the Project should be much more refined, including the cable corridor, than it is at present.		
LD2_CLE_445	Project description and DCO Process	Bloor's development position Bloor have been in discussions with Wiltshire Council regarding the Land over the last seven years. Bloor have submitted representations (with enclosed masterplans), illustrating the potential for a housing-led development on the Land, which has also formed part of Wiltshire Council's assessment for the preparation of the Wiltshire Local Plan 2020-2038. The assessments undertaken by the Council confirm that: a) there are no major affects arising from the potential development of the Land	No.	Comment noted.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		(accounting for mitigation); b) the Land is ranked comparably with other site options that are preferred and chosen for allocation in the Local Plan; and c) Bloor's proposals have accounted for flood risk and drainage, landscape and visual effects, and the provision of suitable and safe access (amongst other things) relating to the development of the Land.		
LD2_CLE_445	Climate Change & Energy Need / Site selection and alternatives	The potential for development on the Land is extensive and it is very likely that (in the short as well as longer term) there will be a requirement for further sites to be developed at Chippenham (which is a principal settlement in the northern part of Wiltshire) beyond those currently identified in the Council's emerging Local Plan. The Land will, therefore, in all likelihood be a focus for the provision of necessary future housing development, and is clearly alignment with government policy as it seeks to significantly boost the supply of homes and support economic growth. IGP's current proposal is unacceptable in terms of the impact it will have on the delivery of these policy objectives and the role played by Chippenham as a principal settlement within Wiltshire. Given that the Land will likely be required as a future	No.	The area to the west of Chippenham lies outside of the settlement framework boundary for Chippenham referred to in Core Policy 1: settlement strategy of the Wiltshire Core Strategy 2015 and is not allocated for housing development under the Chippenham Site Allocations Plan (adopted May 2017). Under the emerging Local Plan (2020-2038), the area to the west of Chippenham still falls outside the Principal Settlement Area for Chippenham. Housing is allocated to the south of Chippenham. Emerging Local Plan Policy 3: Reserve Sites for Housing and Broad Locations for Growth (a new policy) provides that planning permission for reserve sites, as identified on the Policies Map, will be supported in certain circumstances including where a shortfall is identified by the housing land supply statement. Whilst the Emerging

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		location for strategic scale development, it is essential that the proposals for the Project are designed to have the least possible impact on the Land. Bloor support the principle of development of renewable energy projects and their contribution to the energy transition and net zero goals set by the UK government. They believe that the potential of the Land to contribute to the provision of housing can be consistent with IGP's Project through sensible, sensitive and necessary revisions to the cable corridor along the lines of those shared on 31st January 2025.		Plan Policies Map does not yet identify any reserve sites, Chippenham is identified as a broad area for growth, where additional urban extensions will be identified towards the end of the Plan period to meet longer-term strategic needs for housing. The design of the cable route corridor has sought to follow field boundaries wherever possible, thereby minimising the potential to impact land for future development. However, should consent be given and the Scheme is constructed as per the construction programme by 2029, any developer of land to the west of Chippenham (should sites come forward) would engage with the Applicant in the normal way that it would with any utility provider. The Applicant emphasises that, following direct engagement with Bloor Homes and as part of ongoing discussions with the relevant landowner, it became clear that Bloor Homes holds an interest in part of the land initially included within the Scheme boundary at Preliminary Environmental Information Report (PEIR) stage. In response, the Applicant proactively revised the design parameters and amended the Order Limits at the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Environmental Statement [EN010168/APP/6.1] stage to avoid this land interest. This adjustment reflects the Applicant's commitment to working constructively with Bloor Homes and to accommodating mutual development aspirations where practicable. Engagement with Bloor Homes remains ongoing and the Applicant welcomes continued dialogue.
LD2_CLE_445	Project Description and DCO Process / IGP	The Legal Position As the Project will include compulsory acquisition powers within the Order, the statutory code, including statutory guidance, will apply to the justification and merits of including and subsequently implementing those powers (https://www.gov.uk/government/publications/compulsory-purchase-process-guidance/guidance-on-the-compulsory-purchase-process). Compulsory purchase is intended to be a route of last resort. At present IGP have not exhausted discussions with Bloor or the owner of the Land and their agent, neither have they presented a clear justification for including such a substantial area of land within the Order Limits, the width of which cable corridor being inconsistent with the general approach to applications for development consent for energy projects.	No	The Cable Corridor Search Area was initially developed through a desktop optioneering study, which identified a large area within which the Grid Connection Cables could be routed. Through the Applicant's land referencing process it was identified Bloor Homes had an interest in land within the initial and broad Cable Corridor Search Area options. The Applicant met with representatives from Bloor Homes on 31 January 2025 to discuss how both developments could coexist within the Cable Route Search Corridor options presented during stage one consultation. As a direct result of consultation with Bloor Homes, the Applicant included additional land in the Cable Route Search Corridor presented in the Preliminary Environmental Information Report (PEIR)

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Section 122 of the Planning Act 2008 sets out that compulsory purchase can only be included within a development consent order where it is (a) required for the development relating to the order, (b) it is required to facilitate or is incidental to the development; or (c) that it is replacement land in exchange for the order land. An applicant is also required to show that there is a compelling case in the public interest for the land to be acquired compulsorily. IGP have not satisfied any of these requirements in terms of the current proposed cable corridor through the Land.		during stage two consultation to be able to avoid Bloor Homes' interest in land west of the A420 and north of the A4. The applicant is not seeking to include statutory powers on land deemed outside the order limits.
LD2_CLE_445	Project Description and DCO Process / IGP	Bloor's and the landowners' position Given that Bloor and the landowners are interested parties for the purpose of this Project, IGP should have followed the steps set out above in developing their proposal and in engaging with Bloor and the landowners. However, whilst there have been some conversations about the cable corridor and possible revisions to it to reduce the blight to the Land, there has not been any meaningful attempt to justify why such an inappropriately wide cable corridor has been proposed, why this has not been reduced over time, or what the compelling	Yes	The Applicant refers to 3.2.5 of Chapter 3: The Scheme within the Preliminary Environmental Information Report (PEIR) explaining the iterative processes and approach taken to in line with the Planning Inspectorate's Advice Notice Nine: Rochdale Envelope. Section 3.2.6 explains there are aspects of the design which are not fixed therefore the Environmental Impact Assessment (EIA) will assess on a worst-case scenario utilising maximum design parameters to ensure all foreseeable significant environmental effects of the Scheme are assessed within the Red Line Boundary. Such aspects that

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		public interest reasons are either for the use of compulsory purchase powers, or the acquisition of the Land or rights over the land, or for the identification of the Land over other sites for the cable corridor. Although Bloor and the landowners do not object to the principle of the Project in that they support renewable energy projects of this kind, any failure to significantly revise the cable corridor to exclude that part of the Land over which housing and associated development is proposed to be built in future will cause substantial blight to the Land and materially impact on the local policy objectives to deliver much needed housing, including affordable housing. Bloor and the landowners, therefore, request that IGP engage in future meaningful discussions regarding the cable corridor and make material changes to it prior to submitting its application for development consent. Yours sincerely, [REDACTED]		are not fixed at the point of Development Consent Order (DCO) application submission include the micro siting or routing of underground Grid Connection Cables within the Cable Route Corridor, hence the importance of providing optionality to allow for refinement. Ongoing refinement means the indicative working width for installing the cables is anticipated to be 25m to allow for necessary spatial flexibility in the routing of cables, save for instances where it is necessary to have a wider working width to cross existing utilities or a narrower working width to avoid environmentally sensitive features like hedgerows. The working width includes the trench, soil, and spoil storage, working area and haul road with passing places where required. The Applicant emphasises that, following direct engagement with Bloor Homes and as part of ongoing discussions with the relevant landowner, it became clear that Bloor Homes holds an interest in part of the land initially included within the Scheme boundary at PEIR stage. In response, the Applicant proactively revised the design parameters and amended the Order Limits to avoid this land interest.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				This adjustment reflects the Applicant's commitment to working constructively with Bloor Homes and to accommodating mutual development aspirations where practicable. Engagement with Bloor Homes remains ongoing and the Applicant welcomes continued dialogue.
LD2_CLE_022	Landscape and visual	We feel the indicated additional BESS site within Area D on Down Lane is completely inappropriate for many reasons including the following: Within the Lime Down development areas A-E there are inevitably areas / receptors and (particularly) PROWS that are sensitive to visual impact from proposed solar installations. In most instances within Areas A to E those receptors (particularly PROWS) have adjacent fields set aside for continued agricultural use and/or bio diversification enhancement to mitigate potential adverse visual impact. This form of mitigation measure should have been applied to those fields which are now proposed for the site of the proposed new BESS site. At this location three footpaths/PROWs (HULL7, HULL16 and HULL 18 / MALM49) meet and also border the whole site on two of its' boundaries. Instead of visual impact mitigation at this point IGP/LDS propose surrounding this site/field with 3m high metal	No	The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented within Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. This includes an assessment of effects on all affected Public Rights of Way and the effects on the landscape character. Locations of all Viewpoints have been agreed with officers from Wiltshire Council and Cotswold National Landscape. The availability of water supply during a fire event has been assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. These documents confirm the BESS area will contain a minimum of two firefighting water storage

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		palisade fencing. This would be highly visually intrusive and inappropriate and inconsistent with the proposed treatment of other points of similar or less visual sensitivity. We have looked through the LVIA selected viewpoints and cannot see any viewpoints in the vicinity of this proposed BESS. This cannot be right. In terms of acceptable enjoyment for footpath and bridleway users this proposed BESS site will also will create a hostile and unnecessarily alien partial tunnel effect along PROWHULL7. This is in contrast with the remainder of the length of this footpath and bridle path where users of the path benefit from views that are fully open on one side aiding its' proper use and enjoyment. In landscape design terms the inclusion of this site for BESS development breaks an otherwise logical and defensible line between proposed development and open landscape. How can this be justified in landscape terms from both close and distant publicly accessible viewpoints		units of no less than 230,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance). Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This takes account of relevant constraints on the local road network, such as existing railway bridges. There are no proposals to build a permanent bridge as the majority of trips will be via tractor and trailer or operational trips as set in the CTMP. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The Statement of Need [EN010168/APP/7.1] provides a detailed explanation of why the Scheme is urgently

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		Technically the proposed use of this site presents challenges in terms of access for construction, maintenance and emergency vehicles. The clearance height under the main line railway bridge is 4.1m (even without allowing for the build up of adequate surfacing to carry 14 tonne gross weight) whereas the minimum height guidance for bridges on public roads is 5.02m. Even on private roads, a flat bed lorry loaded with a standard container requires an absolute minimum clear height of 4.2m above a suitable built up surface. Water supply. A reliable supply of 1900 l/min is required for a two hour period for fire suppression. How can this be provided in all seasons at this location? Access road flooding. The proposed access road, Down Lane floods throughout the year. Are IGP/LDS going to seriously construct and maintain a permanent bridge over the existing ford to adequately bear a minimum of 14 tonnes? Surely LDS / IGP could find a far more suitable site for a BESS facility. Could you kindly respond to these points well before		needed, why the proposed location is suitable for the Scheme, and how the Scheme addresses all relevant aspects of established and emerging government energy and climate change policy and commitments. The BESS will be designed to provide peak generation and grid balancing services from the electricity grid. The land at Lime Down D offered a site close to the solar PV installations and the onsite substation, providing benefits such as minimising transmission losses, maximising storage efficiency, enhancing grid balancing, and enabling quicker, more reliable responses to power outages and disruptions. Among the options for co-locating the BESS with the solar PV sites, Lime Down D was the preferred choice due to its central location, effective screening, limited proximity to residential areas, and closeness to existing infrastructure like the railway line. Overall, placing the BESS Area at Lime Down D presented the lowest potential for significant adverse effects. There are no proposals to build a permanent bridge as the majority of trips

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		we need to submit our responses to your questionnaire.		will be via tractor and trailer or operational trips as set in the Outline CTMP [EN010168/APP/7.22] . The Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] confirms that the BESS Area and its access arrangements have been designed to ensure there is no increase in flood risk, with runoff controlled to greenfield rates and safe exceedance routes identified for the 1 in 100 years plus climate change event.
LD2_CLE_028	Project Description & DCO Process	Good morning, On the maps at the consultations, there are numbers E1 etc on the fields to mark and differentiate each one. They are not on the maps on the website, so it will not be clear how to comment on particular fields. Could you please republish the maps with the numbers.	No	The Applicant confirms that field boundaries and numbering for the Solar PV Areas (Lime Down A to E) were published on the Scheme website as part of the Preliminary Environmental Information Report (PEIR) Volume 2, Figures 2-2-1 to 2-2-6.
LD2_CLE_043	Community benefits & impact	Having been to one of your consultations I noted that someone had suggested reduced cost solar equipment (not fitting) to be made available to residents in the area. I think this would certainly help appease some!	No	Comment noted.
LD2_CLE_062	Project description and DCO process /	Regarding a meeting in March; I can make myself available most of the time, with some advance notice, as I am retired. A couple of weeks ago my immediate neighbour in	Yes	The Applicant confirms that the residents of the [REDACTED] properties were contacted following this feedback. Moreover, the eastern side of field C15

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	Soils and Agriculture (Ground Conditions)	██████████ mentioned that he spoke to a member of your team regarding a visit in March and was awaiting contact from them. Perhaps he has been contacted now - his name is ██████████. He has already suggested that we meet at the same time, so I can fall in with whatever arrangements are made with him as he is more constrained by work than I am. I have some information on the Borehole which is attached. Please note that the address on this information is incorrect as I believe it is of the person who owned the land and barn prior to its development. Hopefully the Grid reference for the borehole itself is correct! Each of the properties (1-4 Grain Store Barn) have a small holding tank each to avoid all the residences asking for water at the same time. The water is pumped out of the Borehole, filtered and U.V treated before the holding tanks. Each property also has its own filter and U.V. treatment after the holding tanks. Look forward to hearing from you regarding the visit.		was removed due to proximity to these properties. The ██████████ have been assessed within the Environmental Statement (ES) [EN010168/APP/6.1]. Information relating to private water supplied was requested from Wiltshire Council and the location of private water supply boreholes within 250 metres of the order limits were provided. Risk to these boreholes has been considered in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] and appropriate mitigation has been suggested to ensure that such risks are minimised. The comment regarding the existing borehole supply arrangements is noted. The ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] include assessment of potential risks to groundwater quality, which could in turn affect private water supplies such as boreholes. The Scheme incorporates a range of embedded measures to protect groundwater, including maintaining permeable grassland cover across the majority of the site,

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				avoiding significant ground disturbance during construction, and designing BESS and substation areas with impermeable surfacing, lined drainage, interceptors and self-activating shut-off valves. These measures ensure that the risk of contamination of groundwater supplying private boreholes is very low. The move away from agricultural practices will also remove routine use of agrichemicals, which are a common source of diffuse groundwater pollution, resulting in an overall improvement in water quality risk compared to the current use.
LD2_CLE_219	Project description and DCO process / Soils and agriculture	The proposed sites for Lime Down Solar Park are a random selection with no scientific back up for their choice. It's simply wherever IGP have been able to persuade landowners to sign over their land. The result of which, requires significantly more infrastructure all paid for via massive subsidies from the government using taxpayers' money. It's totally random to then have to link these sites via vast cables and then all the way to Melksham. The harm to the countryside and long-term damage to areas of natural beauty will be	No.	More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Report [EN010168/APP/6.3]. As part of the assessment, the Applicant has also considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated

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		significant and create substantial risk of serious flooding and in an area already with a proven flood prone soil profile. I understand that 30%of the land in this scheme is prime agricultural land and it makes no sense to vandalise this valuable resource especially in the current worldwide political climate we are living in. Food security is just as important as energy . We are an island and already heavily reliant on food imports so why make it worse? I can't believe the theory that biodiversity will actually increase in these areas. Common sense says not. Such an infrastructure will be one of the largest in the UK and seen for miles in the Cotswolds AONB. This will have a very negative effect on an area that's renowned for its beauty and tranquillity, negatively impacting thousands of jobs that rely on tourism in the area. Why not put solar panels on brownfield sites, roofs, and car parks at the very least? Given that the UK is one the least obvious places to rely on solar energy in the first place surely following the example of other northern European countries should be		inefficiencies involved in connecting multiple small sites. Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

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		considered and take the learnings from their and others around the world mistakes before we make almost irreversible decisions. I don't see any evidence of this, only financial gain with woeful disregard to the long-term impact. I question where these solar panels and battery storage units are being manufactured and wonder how much analysis has been done on the broader impact on climate change? Just to be clear, I have no objection to green energy. In fact, quite the opposite as the house we built in 2013 was one of the most energy efficient with world class insulation and ground source heating to name just a few. We have 50 acres and take great care to protect and enhance the environment by planting native trees and hedgerows therefore encouraging and protecting our most valuable countryside ██████████		Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. A full assessment of the effects of the Scheme on Landscape, Employment and Tourism can be found in ES Chapters 8: Landscape and Visual and 16: Socio Economic Tourism Recreation [EN010168/APP/6.1]. As set out in ES Chapter 7: Climate Change [EN010168/APP/6.1], the solar panels and BESS units will likely be sourced from China or a country of similar distance from the UK. The Applicant is a supporter of the Solar Stewardship Initiative (SSI), a solar-specific supply chain assurance scheme. The SSI has published a dedicated environmental, social and governance standard which aims drive a more responsible, transparent, and sustainable value chain. To demonstrate our support for the

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				principles set out in the Solar Stewardship Initiative, we will always seek to use PV modules where possible from manufacturers that can demonstrate they are following the SSI Standard in future projects.
LD2_CLE_286	Socioeconomics, tourism, recreation and health	I farm land adjoining the proposed Solar development. The property is registered to E. Boggis and Son and the address is: Avil's Barn Avil's Lane Lower Stanton St. Quintin Chippenham SN146DA As well as being a grassland farm it is also the training ground for horses trained by [REDACTED] who is an international Event Rider, Olympic rider and European individual silver medalist and team gold medalist sponsored by Sport England. The proximity of 4 meter solar panels (outlawed in most of Europe) will almost certainly have a negative effect on her horses and their training regime, which may ultimately cut short her International career unless she can find alternative land with stabling and facilities needed for this demanding sport. Having lived in this area for almost 20 years, I believe any benefits to the environment will be negated by the power of	No	Equestrian facilities, including private stables and paddocks, studs, and riding schools have been considered as specific recreational receptors in the assessment in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. The likely effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3] which identify no significant residual effects to their operation or recreational use subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening, offsetting away from neighbouring paddocks, and PRow protections) secured through the relevant management documents set out in the draft Development Consent Order (DCO) [EN010168/APP/3.1].

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		ten by the loss of Agriculture land and the effect on flora and fauna, not to mention the ruination of some of most historical and beautiful countryside in England. Pure Vandalism !!		The Applicant notes that while equestrian facilities on Avil's Lane are directly adjacent to Lime Down E, these are largely visually screened by a mature tree belt, thus minimising visual impacts. It is anticipated that effects on the use of PRow for hacking are likely to have a greater impact on these facilities than direct impacts on the paddocks and stables.
LD2_CLE_289	Project description and DCO process	I am writing to express our concerns over the Lime Down project. We feel strongly that the sheer scale of the project will spoil the beautiful countryside around us and that the land should be used for food production. We believe solar panels should be installed on modern industrial and agricultural rooftops and compulsory on similar new buildings. If this project goes ahead the construction process will have a huge impact on the local community, with so many lorries using country roads that are unsuitable for the scale of Lime Down.	No	The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at PEIR as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur.

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				The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality

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				Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites. Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power

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				2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that “Solar energy is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy” (p15). The Roadmap talks to the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because “Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale” and “Speed of deployment is also a huge benefit of solar” for both ground mounted and rooftop schemes (p15). This “makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets.” The Roadmap includes illustrative

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				deployment scenarios which “show that reaching the Clean Power 2030 range is achievable, but will require significant action” (p16). Large-scale solar represents 60-65% of the UK’s installed solar capacity by 2030 in the Roadmap’s illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range through the illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in deployment of these schemes must be made up for by other technologies, including from large scale schemes. Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_293	Project description and DCO process / Transport and access / Socioeconomics, tourism, recreation and health	Dear Messrs IGP, Lime Down Subsidy Park I am writing in response to your request for consultation responses on the above project. I would very much like to see more detail in your proposals so that I could draw up specific comments and in their absence must make some general points. The absence of detailed information is, collectively, a sign of bad faith by you and your advisers. The "consultations" thus far have been anodyne with insufficient managerial expertise on hand to give detailed answers. The proposed development represents a large cumulative impact on the district. It will form a blight on the area, and it is questionable if the technology will last long as it is likely to be superseded by superior solutions as human history shows us. The cable routes are not sufficiently accurate to make any useful observations except that they travers ground and cross	No	Comment noted. A full assessment of all environmental impacts is now available in Development Consent Order (DCO) Volume 6: Environmental Statement (ES) [EN010168/APP/6.1]. Moreover, updated plans and drawings are also available in DCO Volume 2: Plans, Drawings and Sections [EN010168/APP/2.1]. Cumulative effects have been considered in ES Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. Since Preliminary Environmental Information Report (PEIR) the Cable Corridor Route has been surveyed, refined and assessments provided within the ES [EN010168/APP/6.1]. Any areas of particular environmental sensitivity have been avoided or mitigated against, including for example through the use of Horizontal Directional Drilling (HDD). The Applicant noted the concern regarding the height of the panels, however, would like to emphasise that 4.5 m is an absolute maximum height for the tracker panels - of which they would be in this position for a

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		roads that have not been surveyed archaeologically and hydrologically (or indeed agriculturally since the 1940s.) No one knows what ancient treasures will be destroyed or water courses contaminated by the work – certainly you and your shareholders do not. Solar panels at 4.5 meters in height are too large and intrusive in the Cotswold landscape and will be clearly visible on all promontories for several miles radius. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]		very small period of time. Moreover, a robust programme of screening and fencing has been developed to minimise the number of landscape and visual effects associated with the Scheme, these are available to view in ES Figure 8-15: Indicative Masterplans [EN010168/APP/6.2]. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at PEIR as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		[REDACTED] The transport infrastructure of the district is simply not up to the large number of vehicle movements including staff movements during the build. It will be hugely disruptive. I am also disturbed that work on traffic counts has been started without licence from Wiltshire Council. This is underhand and unprofessional and I will be suggesting that it should be raised with the professional bodies of the engineers involved who should know better. I see this action as a further sign of bad faith on your part. The emotional distress caused by the complete and permanent destruction of the landscape, the upheavals of the build and the cable laying will be huge. As mental health is a growing concern in our district, this proposal is only going to exacerbate the problem. Finally, I reiterate the need for more		and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The Applicant recognizes the concerns regarding the supply chain for solar panels, [REDACTED] [REDACTED] As outlined in ES Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1], solar panels and BESS units are likely to be sourced from China or countries of similar distance from the UK. However, we are committed to ethical sourcing and are active supporters of the Solar Stewardship Initiative (SSI), a solar-specific supply chain assurance scheme. The SSI has established a comprehensive environmental, social, and governance standard aimed at promoting a responsible, transparent, and sustainable value chain. To uphold these principles,

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		information at an early stage prior to submission of your proposals so that a complete assessment can be made and detailed objections raised.		we will prioritize using PV modules from manufacturers that adhere to the SSI Standards, [REDACTED] [REDACTED] [REDACTED] Traffic surveys were undertaken by an independent and certified traffic survey company. It is understood that they obtained all relevant licences and no issues on this matter has been raised by Wiltshire Council The Applicant acknowledges there will always be some impact on community sense of place as a result of changes in their surroundings, and the potential this has for mental health impacts from this type of development. The areas most immediately affected have been assessed in Section 18.10 of ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. The Applicant is committed to ensuring sufficient mitigation measures are put in place to minimise adverse impacts, as set out in Section 18.9 of ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's Stage Two consultation (which was statutory under section 47 of the Planning Act 2008) was carried out in line with commitments and principles established in the Applicant's published Statement of Community Consultation (SoCC). As required by section 47 of the Planning Act 2008, the Applicant consulted with Wiltshire Council on a draft of the SoCC, and had due regard to their comments in updating the SoCC for publication ahead of commencing statutory consultation. Chapter 6: Preparation for statutory consultation under section 47 of the Planning Act 2008 (Oct 2024 – Jan 2025) of the Consultation Report [EN010168/APP/5.1] describes the process of preparing the SoCC, including the Applicant's consideration of comments received from Wiltshire Council (Table 6-1) and adherence to commitments made in the published SoCC (Table 6-4).

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_300	Project description and DCO process / Cumulative Effects	Section 2 - General SAFETY IS NOT MENTIONED but enclosed high voltage areas are unsafe, fires cannot be put out. THIS PROJECT RISKS LIVES. INCREASED RISK TO SAFETY OF THE BRISTOL TO LONDON RAILWAY LINE. Q1 Ground mounted solar should be wind. Solar should be on existing roofs not food-producing land. Solar panels made in China may have been produced by slave labour. Q2 I do not support this destructive project. Q3 You should consider ALL of the mentioned climate impacts and STOP the project. Q4 Solar is not well suited to the UK. This project is about FARMING SUBSIDIES to serve the GREED of those farmers whose land is being used and the bank that is funding it.	No	<u>Safety:</u> The Applicant is committed to delivering a safe and responsible Battery Energy Storage Systems (BESS) solution that will meet or exceed the latest regulatory and compliance standards, including the National Fire Chief Council Fire Safety Guidelines. The BESS design incorporates several safety features to prevent issues such as overheating or short-circuiting. These include thermal management systems, built-in sensors, and monitoring software to detect and address potential problems early. A comprehensive Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] has been prepared as part of our application for development consent. We have also assessed the risk of fire from BESS in Environmental Statement (ES) Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1]. This chapter

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Section 3 NONE OF THE CONSULTATION INFORMATION MENTIONS THE EXISTING SOLAR FARM AND THAT 2 OTHERS NEARBY IN THE CONSTRUCTION AREA ARE ALREADY APPROVED Q5 Maps offered are MISLEADING, attempting to minimise the DESTRUCTIVE IMPACT on the countryside and its inhabitants. The detailed map on the info website for section C DID NOT AGREE with the Indicative Map - pointed out to your staff at the Luckington meet and a different map shown the next day, but without the Cable Route being shown. The Consultation was therefore based on wrong information. Q6 PHOTOGRAPHS used in your booklets and at the Consultations were MISLEADING, showing smaller panels than those actually proposed. I complained at the Grittleton consultation but MISLEADING posters were still being used 2 consultations later. Q7 Impact will be DEVASTATINGLY DESTRUCTIVE. Hedges will not hide a 4.5 metre metal structure, nor cover NOISE AND LIGHT POLLUTION in the landscape.		concludes that there are no significant risks posed from risk of fire from BESS due to the implementation of the Outline BSMP. <u>Climate concerns:</u> The impact of the Scheme on climate has been assessed in ES Chapter 7: Climate Change [EN010168/APP/6.1]. <u>Site selection and alternatives:</u> Information relating to the site selection process and need for the scheme can be found in ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Development Consent Order (DCO) Volume 7: Statement of Need [EN010168/APP/7.1]. <u>Cumulative Impact:</u> Existing Solar Farms have been considered as part of the baseline assessed within all the technical chapters in ES Volume 1 Chapter 7 to 20. Forthcoming solar Schemes which have not yet been built are considered within ES

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Sheep die. PRETENDING THE PROJECT SITE WILL RETURN TO FARMLAND IN 60 YEARS IS A LIE. Q8 10 tenant farmers being thrown off the land and YOU PRETEND there will be more planting and wildlife. LIES. Q9 You MINIMISE THE DESTRUCTIVE IMPACT.		Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. These are also illustrated in ES Volume 2, Figure 21-2 Location of Cumulative Solar Infrastructure [EN010168/APP/6.2]. <u>Consultation materials:</u> The maps and figures provided at the Consultation Events were indicative and for information only. It is noted that some of the figures provided to support Statutory Consultation are simplified graphics of that which is presented within the ES [EN010168/APP/6.1] and some elements have been omitted in order to aid the understanding of the general public. The Applicant is confident the final Figures and Plans in the ES [EN010168/APP/6.1] provide an accurate depiction of the Scheme. <u>Landscape, noise and light pollution concerns:</u> A full assessment of these aspects are provided in the following chapters: ES Volume 1 Chapter 8: Landscape and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Visual, ES Volume 1 Chapter 9: Ecology and Biodiversity and ES Chapter 14: Noise and Vibration [EN010168/APP/6.1]. Concerns regarding tenant farmers: The Applicant acknowledges the concerns raised in relation to the potential displacement of tenant farmers. Where such instances arise, the Applicant and its partnering landowners are committed to working sensitively and constructively with affected parties. In particular, the Applicant is actively seeking to provide alternative land holdings and appropriate measures, where feasible, to minimise disruption and support the continuity of local agricultural businesses. These matters are being approached on a case-by-case basis, through direct engagement with those affected
LD2_CLE_300	Cultural heritage	Section 4 Q10 CABLE ROUTE MAP The maps given out at the consultation events are very unclear. The Public Consultation document refers to their	No	Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by appendices in Volume 3 (12.1 to 12.7 [EN010168/APP/6.3]) has assessed the potential impact of the Scheme on identified archaeological and built heritage

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		website limedownsolar.co.uk for consultation materials At the Luckington consultation yesterday,15th February, I pointed out that the internet documents section map for LimeDown C showed a cable corridor that was not the same as the one on the large scale map shown at the Hullavington, Grittleton and Luckington consultations. This morning February16th, different maps are shown on the website. Referred to as PEIR Volume 2 Figure 8 -15 -3, the LimeDown C detailed map is different from yesterday's and the cable corridor is no longer clearly delineated, although it remains the same on the 'Indicative' map. I showed [REDACTED], Project Manager for IGP, that over 80% of the proposed cable corridor around Surrendell Farm was affected by evidence on the map and in history books of ancient graves and remains. The pathway on the east edge of the remains of Surrendell Wood (mostly felled 2 -3 years ago and now re-planted) is probably the only part of the proposed cable route at this point that is not contra-indicated by historic evidence. The fields below Surrendell Farm are trenched for Ground Source Heat Pumps. 3		assets as a result of the construction of the cable route. The cable route corridor has been placed to minimise any impact to Surrendell Deserted Settlement (HER ST88SE450), as such no significant effects are recorded as a result of the Scheme to this heritage asset. See Section 12.11 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and the overarching archaeological mitigation strategy provided in ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3), for archaeological mitigation proposed for the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		kilometers of pipework 1 metre down filled with glycol. BRIEF HISTORY OF SURRENDELL There is only one place in the world called Surrendell. The Domesday Book, a survey of taxable property in England carried out in 1086-7, tells us that a thousand years ago Surrendell was occupied by 12 villans, 3 bordars and 4 slaves, and was considered worth £7. Later accounts confirm a mediaeval village of up to 400 people with a Church and graves. Some remains were still to be found at the end of the 17th Century. Surrendell Farmhouse is described as the New farmhouse in 1620, and was likely built with stone from the dilapidated village. Floor timbers show signs of having come from wrecked ships, possibly from the sinking of the Spanish Armada in 1588, whose timbers were sold all over west England. The house and its adjacent, unusually symmetrical, barn are both listed Grade 2. Fresh water can be found very close to the surface, which probably accounts for why		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		there have always been dwellings here. The farmhouse garden has a well and a Victorian brick-built reservoir which fills from this high water table, also a rare cart pond. Aubrey's Collections (written about 1680) states that in 1580 there was a large Manor House on the field immediately east of the farmhouse (demolished c.1871). Pig Lane ends abruptly at the entrance to this field near Farleaze, becomes impassable except to farm vehicles, and restarts at the bottom of the field by what is now Surrendell House (marked on the OS map as Surrendell Cottages). Amateur metal detectorists have dug up Roman coins and other artefacts on this field, and state this must be the site of a former Roman villa. They also suggested there is evidence of an iron age dwelling here. Wiltshire Forefathers describes foundations marks below ground seen in 1955 on the fields to the east of the farmhouse. The farmer at that time, [REDACTED], confirmed there were more foundation marks to the west as well, the site of the church and village. 100 metres to the west of the farmhouse, these show clearly in aerial photographs. This field is statutorily		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		protected from being ploughed. The Tumulous Mound shown on the O.S. map below the farmhouse, is called a 'long barrow' in Malmesbury Hundred. Both descriptions suggest a grave of some importance lies here under stones. Malmesbury Hundred also refers to a cromlech to the east of the long barrow. A large standing stone in the garden of what is now Surrendell House (formerly Surrendell Cottages), known locally as The Soldier's Grave, is probably the above-ground evidence for this cromlech Evidence of English Civil War skirmishes in the fields around Surrendell still comes to light. Twenty years ago ancient skeletons of a man, woman and child were found below Surrendell Farm, causing a significant police investigation, until the bones were found by analysis to be from that time.		
LD2_CLE_300	Project description and DCO process / Cumulative Effects / Decommissioning and	Section 5 Q11 CUMULATIVE BLIGHT over the whole 20 mile cable and construction area. LANDSCAPE DESTRUCTION. HISTORY DESTRUCTION. MENTAL HEALTH DETERIORATION. This project will BLIGHT THE LIVES of	No	The Applicant appreciates that the potential for the Scheme to have adverse effects creates uncertainty and anxiety for local residents. The comprehensive and detailed approach to consultation, Scheme design, and the Environmental Impact Assessment (EIA) process has allowed any adverse effects to be identified

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	construction / Community benefits and impact	THOUSANDS for the greed of a few landowners who will sell up and move away. DECOMMISSIONING - you are lying about the potential to return to farm;land after 60 years. The land will be poisoned for any crop growing. Section 6 Q12 DO NOT CARRY OUT THIS DESTRUCTIVE PROJECT. THERE ARE NO COMMUNITY BENEFITS, YET WE CARRY THE LONG TERM EFFECTS FOR YOUR FINANCIAL GAIN. SHAMEFUL GREED Q13 Previous experience shows DEVELOPERS TELL LIES. YOU ARE NOT TRUSTED TO DO ANYTHING YOU PROPOSE OR EVEN PROMISE. Section 7		appropriate mitigation integrated into the design, where practicable, such as through the buffers and vegetation screening proposed as part of the Scheme. Detailed management plans will need to be approved post consent by the local planning authority. These detailed management plans must substantially accord with the outline management plans developed as part of the Development Consent Order (DCO) Application, meaning the Applicant will be legally required to implement mitigation which has been proposed.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q14 This project is destroying lives, mental health, house prices, natural ecology and food production for a solar technology which has already been superseded by better options.		
LD2_CLE_311	Landscape and visual / Project description and DCO process	Subject: Formal Objection to the Inclusion of Field C20 in the Lime Down Solar Development I am writing as a near neighbour of the proposed Lime Down Solar Development to formally express my strong objection to the inclusion of Field C20 in the scheme. My property, Lordswood House, is directly impacted by this section of the development, and I request that this field be removed from the plan due to its significant and detrimental effect on my home, land, and the surrounding area. Impact on Property and Surroundings Lordswood House is one of the most invested and well-maintained properties in the area, with extensive landscaping and recreational facilities that integrate seamlessly with the natural environment. The placement of solar panels in Field C20 would have a highly negative impact for several reasons:	Yes	Following Preliminary Environmental Information Report (PEIR) and input from technical disciplines the Scheme has undergone various design revisions including the removal of parcel C20 from the Scheme. No Significant Effects were recorded for Lords Wood House (RI019). Refer to Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		1. Loss of Property Value – The close proximity of solar panels to my land, particularly near the cricket pitch, pool area, and ancient woodland, will significantly affect the desirability and value of my property. The visual intrusion will diminish the open landscape and make it feel as though these recreational areas are enclosed by industrial infrastructure. 2. Incompatibility with the Character of the Area – Lordswood House is situated in a rural and scenic setting, and this particular field plays a crucial role in maintaining the character of the local environment. The introduction of solar panels in this location would be inconsistent with the natural and historic landscape, damaging the aesthetic appeal of the area. 3. Impact on Recreation, Community Use, and Public Enjoyment – Lordswood House is not just a private residence; it serves as a key location for community and charity events, attracting hundreds of visitors throughout the year. The house and its grounds, including the cricket pitch and social areas, are highly valued for their unique beauty and setting. The introduction		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		of solar panels in this field would fundamentally alter the character of these spaces, diminishing their appeal and affecting the enjoyment of those who visit for social, recreational, and charitable gatherings. 4. Proximity to Ancient Woodland and Environmental Concerns – The proposed development directly borders ancient woodland, an irreplaceable habitat that must be preserved. The potential ecological impact of solar panels so close to such a sensitive site is concerning, and I believe more substantial environmental safeguarding measures should be taken. 5. Future Health Concerns – While there are no currently known health implications of solar panels, should any arise in the future, having them positioned so close to my property would be a direct and unwarranted risk. Given the scale of this development, this could set a precedent for future claims if adverse health effects were ever identified. Flexibility and Compromise on Other Impacted Areas		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		I want to highlight that I have been highly flexible regarding other areas of the development that impact my property. Given the surrounding landscape of [REDACTED] there are multiple vantage points from which the solar panels will be visible. However, I have worked constructively with the team to ensure compliance and have accepted compromises in those areas to support the project. For this reason, I feel particularly strongly that Field C20 should be excluded. Unlike other affected areas, this specific location has a unique and outsized impact on the setting and usability of my property. Its removal would be a reasonable and fair adjustment in recognition of the flexibility I have already shown elsewhere. Proposed Mitigation if Field C20 is Not Removed If Field C20 cannot be entirely removed from the scheme, I strongly urge that the following mitigation measures be implemented: • A minimum 100-metre buffer zone between my property and the solar panels to reduce		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the impact on views, privacy, and the enjoyment of my land. • Planting of a continuous woodland barrier along this buffer zone, ensuring the preservation of the landscape's natural flow. This should include: • A mix of native species to align with the existing ancient woodland. • Evergreen planting to provide year-round coverage, ensuring that any short-term partial screening I have put in place can be removed without compromising visual protection. • A fully enclosed woodland environment that seamlessly integrates with the existing woodland, ensuring the preservation of the rural character and shielding the property from the industrial development. Additional Screening for Field A10 In addition to my concerns regarding Field C20, I would also like formal confirmation that there will be substantial screening of a suitable height and depth on Field A10. This is a critical requirement as Field A10 directly impacts multiple key viewpoints from my property, affecting its outlook and overall setting. Any mitigation in this area must be sufficient to fully screen the development		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		from view and maintain the natural beauty of the surroundings. Request for Consideration I believe that properties with lesser impacts have been given consideration, yet Field C20 presents a direct and unique detriment to my home and its surroundings. Lordswood House is a property of significant community and social value, and its setting is integral to maintaining its appeal. Given the scale of this development, I respectfully request that my concerns be taken seriously and that Field C20 be removed from the proposal or subject to substantial modification to reduce its impact. I would appreciate confirmation that this objection and request have been formally recorded as part of the consultation process. I look forward to your response and to further discussions on ensuring that this development proceeds with appropriate respect for the local community and environment.		
LD2_CLE_329	Landscape and visual / Cultural	Following my initial letter of objection last night and within the initial consultation, to the inclusion of Field C20 in the Lime Down	Yes	Following Preliminary Environmental Information Report (PEIR) and input from technical disciplines the scheme has

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	heritage / Project description and DCO process	Solar Development, I would like to submit additional concerns that have come to light upon further review of the plans. These points further support my strong request for the removal of Field C20 from the scheme or, at the very least, the implementation of significant mitigation measures. 1. Unprecedented Scale and Industrialisation of a Rural Landscape A key issue that I had not fully considered in my initial objection is the height of the proposed solar panels, which are suggested to be between 3.5 and 4.5 meters. This is substantially larger than standard solar farms in rural areas and represents an unprecedented scale of development that is completely out of character with the local environment. Notably, all other solar parks in this region appear to propose significantly lower panel heights and do not incorporate mechanical tilting technology. This means that the Lime Down development is far more intrusive than other comparable schemes and brings with it a level of industrialisation not previously seen in this area. The combination of sheer height, mechanical movement, and density		undergone various design revisions including the removal of parcel C20 from the Scheme. Regarding the use of tracker panels, the Applicant has considered the impacts of 4.5 m tracker panels across its Environmental Impact Assessment, including landscape and visual effects, as set out in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Predictions of operational noise are reported in ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. As explained in Section 14.4, noise from a solar panel tracking motor would be below 20dB at nearby sensitive receptors and therefore well below the existing ambient sound level and, as such, unlikely to be noticeable. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		of panels will result in an intrusive visual impact and a fundamental change to the open rural landscape that makes this area so unique. This development risks setting a damaging precedent for future projects, leading to the progressive industrialisation of countryside areas that have long been protected for their natural and historic value. 2. Noise Pollution from Tilting Panels and Motors It has also come to my attention that the panels in the development tilt and therefore require motorised mechanisms to adjust their position throughout the day. This is unusual for solar farms in the region and introduces an additional layer of impact that has not been properly assessed. ██████████ is situated in an exceptionally quiet rural area where sound carries for miles. Even minimal mechanical noise in such an environment becomes amplified, meaning the cumulative noise from a large-scale array of moving panels will have a noticeable and detrimental effect.		line boundary has significantly reduced from the layout assessed at PEIR as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES [EN01068/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		This is particularly concerning given the scale of the proposed farm and its close proximity to my property. The introduction of artificial mechanical sounds in a setting that is currently dominated by natural, ambient countryside noise is unacceptable and will disrupt the tranquillity of the area. 3. Long-Established Equestrian Use – Impact on Stables and Paddocks Another critical issue is that Field C20 directly borders my horse paddock and stables, which have been used for equestrian purposes not just for the past eight years under my ownership, but for decades by myself and previous owners of Lordswood House. The paddock and stables are an integral part of the property, and their usability for equestrian purposes is a key factor in the property's value and appeal. While the paddock is not currently occupied by horses, it remains fully designed, maintained, and intended for equestrian use, either for myself or for future owners.		Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. Equestrian facilities, including private stables and paddocks, studs, and riding schools have been considered as specific recreational receptors in the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. The likely significant effects on these locations are specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3] which identify no significant residual effects to their operation or recreational use, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening, offsetting away from neighbouring paddocks, and PROW protections) secured through the relevant management documents set out in the draft Development Consent Order (DCO) [EN010168/APP/3.1].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Solar farms can pose significant risks to equestrian facilities for several reasons, including: • Visual disturbance – Horses are highly sensitive to movement and changes in light. The glare, reflection, and movement of tilting panels could startle them, making the paddock unsuitable for riding, training, or grazing. • Noise from motors – The operational sounds from the panel mechanisms could unsettle horses, leading to behavioural issues and safety concerns for riders. • Loss of usability – If the paddock becomes unfit for use due to these factors, it significantly diminishes the function, value, and desirability of my property for equestrian purposes. Given that no other areas of the scheme appear to directly impact equestrian facilities in this way, I believe this is a strong case for the exclusion of Field C20 from the development. 4. Reaffirming the Unique and Severe Impact of Field C20		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		I want to reiterate that while I have been flexible in accepting impact from other fields, Field C20 is uniquely harmful due to its immediate proximity and the multiple layers of impact it creates: • Significant devaluation of my property due to large-scale industrialisation of an area that has never seen such a development. • Unprecedented panel height (up to 4.5m) that would be visually intrusive and out of character for the area. • Mechanical noise from tilting panels, which will disrupt the otherwise silent rural setting. • Direct impact on longstanding equestrian facilities, making the paddock and stables potentially unusable for their intended purpose. • Severe alteration of an area that attracts hundreds of visitors annually for its exceptional beauty and recreational value. 5. Request for Consideration and Further Discussion Given these additional concerns, I would like formal confirmation that these points will be included in the consultation record. I request further engagement on how the		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		development team intends to address the height, noise, and impact on equestrian use within Field C20. If Field C20 is not excluded from the scheme, I strongly urge that additional mitigation be put in place, including: 1. A significant increase in screening, ensuring that the full height of the panels is obscured. 2. A full 100-metre buffer zone planted with mature woodland, including evergreen species, to restore the continuity of the landscape. 3. Further assessment of noise impact and mitigation strategies for mechanical disturbances. 4. A thorough review of equestrian suitability and potential risks to horse welfare. Additionally, I request formal confirmation that there will be substantial screening of a suitable height and depth on Field A10, given that this area directly impacts multiple key viewpoints from my property and requires noise suppression where possible.		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		I appreciate your attention to these critical concerns and look forward to your response on how these issues will be addressed.		
LD2_CLE_318	Socioeconomics, tourism, recreation and health / Project description and DCO process	Issues with Area E 1.Economic Impact on the AREA E farmers and Village With regards field numbers, E32, E33 and E34, these are made up of Grade 2 Land. They also are the main arable fields for [REDACTED] - tenant of [REDACTED]. Without these fields, [REDACTED] farm become unviable, and he will effectively be put out of business by any economic measure. While his cattle will have summer pasture, he will now have to import straw and feed from further afield and at greater expense. Andy's farm supports his family and extended family, employing his nephew during Harvest. The same applies to fields E1, E2 and E3 which are down to Maize to feed the [REDACTED] cattle. The third farm in the village is looked after by [REDACTED]. Their jobs will effectively be made redundant. The fields should not be included in the scheme as they will damage jobs in the village, reduce prime land availability and likely to create	No	An assessment of likely agricultural job losses as a direct result of the Scheme and as a result of supplier and downstream industry losses, has been assessed in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supported by specific assessment of agricultural circumstances in ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] . The Applicant is cognisant of likely adverse effects being felt at a more localised level than potential beneficial employment effects during the Scheme's construction and operation. As a result, the Applicant commits to promoting and supporting local employment, procurement and investment through the Outline SSCEP [EN010168/APP/7.20] .

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		more carbon as the people living from this land will travel further to find work. This is all very negative for the village. The overall effect on the village life will be devastating. We are only made up of 65 people and 20 households, and this development will effectively reduce the employment in the village, and drive all the people that look after the farms away. There will be nobody left working in the village and everyone must drive elsewhere to find work. In fact – to put it succinctly. The earnings from the land that is currently spread amongst the landlord, several farmers and the teams that support them, will now be earned by one landlord and whichever foreign investors own the solar farm. Is this really what is good for the Nation?		
LD2_CLE_318	Transport and access	2. Access to Area E Access to Area E is severely compromised. You are proposing to run HGV's regularly through a conservation village on a single track road, within 2 metres of listed buildings and on a road which currently has many	Yes	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		walkers due to the low volumes of traffic. It also proposes that on exit, the lorries will leave the track and turn left onto Rodbourne Road and down through Corston. There are two major issues with this - firstly turning left out of the track for an HGV will be extremely difficult and likely to lead to significant tree and other environmental damage in the process, secondly there is an extended section of hemmed in single track lane through Corston which easily blocks on the one or two days we have a refuse truck through. It would be very difficult to manage this in a reasonable way. School children walk up and down this road.		Corridor [EN010168/APP/6.2]. Rodbourne no longer forms part of the construction vehicle routes with Access to Lime Down E being taken directly from the A429. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects.
LD2_CLE_318	Ecology and biodiversity	3. SSSI in centre of Panels. An important SSSI sits in the middle of E. With the unknown effects of the tracker panels on the ecology, and the potential for more extensive flooding at the lower end of the SSSI field from the effect of the panels, can you please plan to move the panels further from this highly sensitive and valued location.	No	A comprehensive assessment of impacts on designated sites, including Harries Ground, Rodbourne SSSI which lies adjacent to Lime Down E, is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . This assessment concludes no significant impact on this SSSI is anticipated to occur as a result of the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_318	Site selection and alternatives (Planning Statement)/ Cultural heritage / Landscape and visual / Transport and access	4. Contradiction to Neighbourhood plan Page 21, Volume 1 of the Neighbourhood plan for the area highlights the importance of Malmesbury Abbey as the Jewell in the crown of the area. Area E has a direct view of the Abbey. Malmesbury Abbey is a Scheduled Ancient Monument. The plan goes on to state: "The conservation areas of Malmesbury, the villages and hamlets such as Rodbourne, must be maintained and preserved where possible for future generations". Can you confirm how installing 132KV substations, the solar panels, and the access route will meet our neighbourhood plan ambitions.	No	The Applicant has considered the Scheme's compliance with relevant national and local planning policy, as set out in the planning policy accordance tables (see the Planning Statement [EN010168/APP/7.2]) Construction Vehicles will no longer travel through Rodbourne village to access Lime Down E. An access direct from the A420 will now be provided. The Landscape and Visual Impact Assessment (LVIA) has assessed the effects of the development on all nearby settlements within the 1km Study Area of the scheme. Refer to Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].
LD2_CLE_318	Cultural heritage	5. Effect on Rodbourne, Conservation Village Conservation villages don't start and stop according to lines on the map. Conservation extends to the farms, the social aspects, the land use all round the village. The actual definition is: A conservation area is an area of special architectural or historic interest, the character, appearance or setting of	No	The Scheme design has been amended to remove Solar PV Panels from Fields E7, E8 and E9. In addition, offsets to public rights of way and enhanced screening of existing hedgerows have been incorporated. These measures reduce potential effects on the setting, character and appearance of the Conservation Area and its surrounding farmland, while helping

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		which it is desirable to preserve or enhance. The village currently supports three farming families, but each of these will be compromised, have higher carbon footprints and will have problems going forward as a consequence of the plan. How can this help our village?		to maintain the rural context that supports the local community.
LD2_CLE_318	Site selection and alternatives	6. Distance from the Melksham Sub Station The introduction to the scheme states clearly that IGP searched and found land within 20km of the Sub Station at Melksham. This statement is repeated in the PEIR Site Selection report. The cable run for Limedown E is 23.5km, Limedown D is just over 20kms, no matter which route is taken in the cable corridor. The land should therefore have never been considered as part of the scheme. Can you please confirm why Limedown D&E were included when it fails on this very first key parameter?	No	In its search for sites, the Applicant applied a 20km search radius from Melksham substation. This was measured “as the crow flies” and is shown on Figure 1: the Search Area of the Site Selection Assessment Report provided in Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. All of the Lime Down Solar PV Sites fall within this 20km search radius. The Cable Route Corridor also sits within this radius. The actual route of the corridor has been selected in consideration of various environmental and technical siting constraints (such as buffers around residential properties, minimising impacts on designated areas, ancient woodland and local wildlife sites, and minimising crossing of utilities, transport infrastructure, hedgerows and watercourses). Due to this, it does not follow a straight line from the Solar PV Sites to Melksham Substation, and the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Cable Route Corridor itself is slightly longer.
LD2_CLE_318	Transport and access / Socioeconomics, tourism, recreation and health	7. Safety of Walkers, cyclists and horseriders We have 100's of people up and down the access track proposed every week. At the moment, the track has 4-5 tractor movements per day, depending on the season.	No	It is not completely clear whether this refers to the proposed access track through fields C13, C15, and C16, which has no public right of access, or to footpath WT HULL 23 which runs from Pig Lane towards Hullavington. The former is not a public access track and therefore is not anticipated to be kept open. The footpath WT HULL 23 is retained to be kept open in throughout the Scheme's lifetime. The Applicant acknowledges that WT HULL 23 meets Pig Lane adjacent to the proposed access point 2a/2b, and therefore will implement banksmen to ensure HGVs do not impact upon the safe use of the footpath for users during construction. That notwithstanding, the number of HGVs anticipated to use access 2a/2b is not anticipated to be significantly greater than the number of tractors during peak farming activities. Additionally, the HGV movements will cross the lane rather than run along it.
LD2_CLE_318	Project description	8. Particular fields: Field E7 is small, adjacent to the track, and	Yes	Comment noted. Fields E9 and E10 have been removed from the Scheme boundary, this is due to the proximity of E9 to the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	and DCO process	pasture. It should be developed for environmental purposes to offset the proposed adjacent sub station. Field E9 is small, surrounded by trees on three sides and adjacent to track on the other. It slopes to the South East. Its old pasture. It is by all measures, a poor field for solar panels. Field E10 was planted recently under an environmental scheme. Its small, sloping, with no access and is totally inappropriate. Field E12 meets only one of your criteria - its available. Its old pasture, very undulating highly visible from tracks all round, adjacent to ancient woodland. E33 and E34 – there has been a well used track alongside these fields to Seagry wood for many years. The farms here allow the hunt to move freely up and down here, crossing the bridge in the South Eastern corner of E34.		Cotswold National Landscape and the identification of saplings in this field by the general public. Moreover, panels have been removed from E7 and will likely be used for ecological mitigation as suggested in the comment. The Applicant feels E12 is an appropriate site for panels given the appropriate offset from the ancient woodland (in line with Forestry Commission guidance) and use of screening to mitigate views. The eastern boundary of fields E33 and E34 (understood as a former drover's trail between Seagry Wood and Cleeve House) is currently a permissive access route only. This is anticipated to be informally retained as available for permissive access throughout the lifetime of the Scheme. Trail hunting or drag hunting is only to be permitted on this route subject to the discretion of the Scheme operator due to increased risk of damage to the surface for recreational users, and groundcover planting provided for biodiversity and user experience enhancement.
LD2_CLE_334	Project description and DCO process /	Situated in Proposed Lime Down C We are local residents faced with the prospect of having Solar Panels on 3 sides	Yes	Comment noted. The Applicant thanks the respondent for raising this issue. [REDACTED] was erroneously identified as a farm outbuilding at PEIR stage. The

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	Soils and Agriculture (Ground Conditions) / Transport and access	of our premises with no regard to the outlook from our property, which is a converted [REDACTED] in the countryside with views across open countryside. The [REDACTED] was converted in such a way as to take maximum advantage of these views and you are trying to spoil all that we have without any compensation or regard to our mental well being. This farm will only produce anything like the power outputs you quote for maybe 6 months of the year, and peak output only when the sun actually shines. At least farmers could plant winter wheat. We walk across fields via the public footpaths directly adjacent to our property at the moment, Will it be "let's go for a walk between the solar panels?" Misinformation You cannot even get the information correct on your plans. There is one of your maps which shows our property as ancient woodland, so how can we rely on the information you are providing? It seems that you have not recognised the fact that this is a building housing 4 residential units with families and is NOT a Grain Store Barn of old.		Applicant confirms this has been corrected within the Environmental Statement (ES) assessment [EN010168/APP/6.1] and the residential properties identified as a receptor. Moreover, the design was amended to remove the eastern side of field C15 to reduce the visual impact from the Scheme on these properties. The ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] includes assessment of potential risks to groundwater quality, which could in turn affect private water supplies such as boreholes. The Scheme incorporates a range of embedded measures to protect groundwater, including maintaining permeable grassland cover across the majority of the site, avoiding significant ground disturbance during construction, and designing BESS and substation areas with impermeable surfacing, lined drainage, interceptors and self-activating shut-off valves. These measures ensure that the risk of contamination of groundwater supplying private boreholes is very low. The move away from agricultural practices will also remove routine use of agrichemicals, which are a common source of diffuse

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		We have a Borehole on our property within 100M of the site. This is not shown on your maps. When mentioned at one of the meetings we are told that that will not be a problem as nothing harmful will come off the panels. No mention made of cleaning agents. When asked at the meeting why then is a Borehole survey done? – Silence was the response. If there is any attempt to use Pig Lane for construction traffic this will be met with a firm response from the residents as we do not want to be faced with HGV's as we drive down the lane on our lawful business, or even have emergency vehicles prevented from reaching our property. Workers using the lane as a car park and access will elicit a similar response. If this does go ahead signs prohibiting construction traffic from using Pig Lane will be essential. By the way, the field next to the railway line regularly floods.		groundwater pollution, resulting in an overall improvement in water quality risk compared to the current use. Vehicles will cross over Pig Lane to access fields either side but will not be allowed to travel along Pig Lane. All vehicle movements across Pig Lane will be managed through a Construction Traffic Management Plan (CTMP), including signage and the use of banksmen, which will be in substantial accord with the Outline CTMP [EN010168/APP/7.22] prepared and secured as part of the Development Consent Order (DCO). The CTMP aims to ensure that the effect of the construction phase on the local highway network is minimised. Proposed construction vehicle routes are set out in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. Outside of the identified construction vehicle routes, there will not be transport and access effects.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_334	Noise and vibration	Noise levels We notice that noise readings have been taken from properties half a mile away to our North and South [REDACTED]). These do not have any proposed panels adjacent to them, but [REDACTED] which is between the panels, does not have any noise readings. Why is this? Is it another faux pas like the Ancient Woodland map? Regarding Operational noise we notice that it all comes from your modelling data. In light of some of the errors we have shown, how can we be sure this is not more of the same? We would like to know what you propose to do if any of your information that you use in your submission is found to be incorrect?	Yes	The baseline noise survey, presented in Section 14.7 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with further detail provided in ES Volume 3, Appendix 14-3: Baseline Noise Survey [EN010168/APP/6.3], was designed to capture a range of existing sound levels in the vicinity of the Scheme. It was not designed specifically to be focussed on properties closest to the Solar PV Panels. Furthermore, it is not necessarily those properties closest to solar panels that would be subject to the highest noise levels from the Scheme. The tracking motors in the panels are much quieter than the transformers, inverters and BESS Containers, and, as explained in Section 14.4 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], would be below the existing sound environment at properties. Residential dwellings likely to be worst affected by the Scheme have been assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and significant adverse noise effects are not anticipated.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13], which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1], commits to noise levels from the Scheme at residential dwellings being below levels that would constitute a significant effect to health or quality of life. As such, even if there were errors in the modelling supporting the ES, there is a level of reassurance with regards to noise exposure from the Scheme.
LD2_CLE_334	Landscape and visual	Hedging You propose plant hedging around the panel fields to screen the structures, but have you considered the height they would have to be for someone living 150 metres away on the 1st floor of a property and indeed the time it will take for them to reach a useful height?	Yes	Hedgerows planted as whips grow quickly once established, growing around 20-40cm each year. At year 15 when visual effects are assessed, hedgerows will be on average 4.5 m tall. This will screen views from well used ground floor windows but will not fully screen views from lesser used 1st floor windows.
LD2_CLE_334	Decommissioning and construction / Transport and access	Construction. The local roads were not constructed to carry heavy and large vehicles. They are already pot-holed and the edges are broken up. In places such as Norton they become virtually single track roads. The Fosse Way itself is quite constricted too. It will be	Yes	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2,

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		interesting to see the leisure cyclists holding up the lorries as they do the cars. The cars can squeeze past in places but large lorries, not much chance. Construction noise would be intolerable, day in and day out, with pile driving akin to water torture. This may adversely affect our health.		Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects.
LD2_CLE_334	Ecology and biodiversity	Wild Life We often see Deer in the very fields you are proposing to fence off. Like wise Hares. You are not giving them a good deal.	Yes	Fencing around solar panels will be permeable to all wildlife except deer, meaning most wildlife will be able to freely access habitat within solar array. Brown hares are known to readily inhabit ground mounted solar arrays. Wide buffers will be retained around the peripheries of the Solar PV Site which will allow wildlife including deer to move between favoured habitats
LD2_CLE_334	Project description and DCO process	Other There is no search function on your website, as far as we can see, making it very difficult to find specific information.	Yes	The Applicant can confirm that no panel infrastructure will be proposed between the stakeholder's property boundary and the powerline approximately 170m to the West.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Having met with [REDACTED] I understand that you are removing the panels between ourselves and the overhead cables. That is an improvement, but why cannot they be pushed further Westward toward the Fosse Way which would only take up half of the field still leaving half a field before the Fosse Way. Yes you may have to go back a step but it would solve our objections.		The eastern side of C15 has been removed. The Applicant continues to propose panels in the remainder of C15.
LD2_CLE_334	Socioeconomics, tourism, recreation and health	Conclusion We do not want the scheme! This is the [REDACTED] and pillage of our ancient countryside. It may well affect our Mental Health with all the noise that the construction will generate, and possibly operational noise too . Studies: e.g. National Library of Medicine Nov. 22 addressing depression outcomes, have shown that negative effects were found with poor views from windows. Being in our latter years are we not going to be allowed to enjoy the time we have left to live in the peaceful, tranquil environment that we had planned? It seems that Sky Larks's requirements are more considered, and more important than us mere human beings	Yes	The Applicant acknowledges that construction and operational noise, as well as changes to visual aspect may have a mental health and wellbeing impact. As such, the likely significance of effects from the Scheme are assessed in Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] , which concludes that no residual significant effects from the Scheme on human health (including mental health) are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_378	Ecology and biodiversity	Please be aware that we have breeding water voles and great crested newts in Whitley very close to the corridor what you are proposing to bury the new cables. There is a ditch and a bog area that is their habitat We have seen archeologists surveying the two fields at the bottom of my garden next to Whitley House - right up to the location of these particular species. Given the rare and protected nature of these animals I do hope that you are going to take this into account. It would be a crime to disrupt their territory and a very sad day should the colonies be lost.	No	Potential impacts of the Scheme on protected species are assessed in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. No significant adverse effects are anticipated to occur on either water voles or great crested newts. An Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] has been prepared which sets out specific protection and mitigation measures during the construction phase, to minimise impacts on protected species and ensure all works are legally compliant.
LD2_CLE_397	Project description and DCO process / Soils and agriculture / Socioeconomics, tourism, recreation and health / Ecology and biodiversity	LIME GREEN IS A NONSENSE ON STILTS AND SHOULD BE REJECTED IMMEDIATELY IN THE NAME OF SANITY, FAIR PLAY, AND SHEER COMMON SENSE. I object in the strongest possible terms to the proposed industrial solar complex (laughingly called a 'farm') which has been given the totally irrelevant and made-up name of Lime Down. There are neither Limes nor Downs in this area. - The proposal would change this part of Wiltshire beyond recognition. It would destroy nearly over 2,500 acres of farmland, an area stretching 10km wide and 5km from	No	Food security will not be compromised by the Scheme (or solar energy more widely) - in 2024, solar used 7,100ha of agricultural land, half of which was also used for some form of agricultural production. In the same year, 581,000ha of arable land was uncropped. Although food security is not simply a measure of the quantity of food produced in the country, there are large areas of uncropped arable land in the country and continually increasing productivity within the agriculture sector that offset the use of agricultural land for solar power generation.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		North to South. - This is not just a few fields of small solar panels - this is a monstrous invasion of enormous panels (the size of which, to my knowledge, has not been seen before) on five separate sites, - This farmland, right now, is producing either crops or grazing livestock. Food security is becoming increasingly vital as our population grows and it is sheer folly to destroy the potential yield of this land for up to 60 years. - The sites identified run adjacent to an Area of Outstanding National Beauty which include ancient battlegrounds and the Roman Fosse Way. Malmesbury is the oldest borough in England, home to Malmesbury Abbey and steeped in history. - - This is potentially The Most Damaging Of All Solar NSIP's proposed due to its proximity to so many Cotswold villages. - Industrial sized solar has never been done in such residential rural areas before and, obviously, nothing on this scale has undergone decommissioning. - The booklets and information produced by IGP seem, deliberately or otherwise, designed to confuse and mislead. Fields are shown as they exist today, not as they will look when covered with hideous shiny solar		The position of the UK government is that solar farm developments are not a threat to UK food security and there is no established link between solar schemes and reduced food security. Instead, the UK government considers that climate change is the greater threat to food production and security and the livelihoods of farmers. The UK has always imported foods that cannot be grown in our climate and the proportion of food produced in the country relative to the food consumed has remained steady over the last two decades. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		panels. - Any panels which are shown are not true to scale, photos of sheep and wildlife predominate, whereas we know from experience this is not the case once solar panels are in place. - IGP give bland assurances, which they must know are disingenuous to say the least, and they seek to gaslight local people at every turn. At the same time, they will give nine local landowners (██████████ ██ ██ ██ ██ ██) riches for up to 60 years, beyond the dreams of the overwhelming majority of people in this area, for doing absolutely nothing, whilst destroying amenity & house value, not to mention severe mental stress, to their erstwhile friends and neighbours. - This project is immoral in the extreme. Because of huge subsidies, it will be paid for by taxpayers and energy bill payers for decades to come. It is the biggest transfer of wealth from the poor to the rich in my lifetime.		economy is not material at a national scale and has therefore not been assessed. Impacts on mental health and wellbeing are assessed in Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on community identity and culture, and the likely mental health impacts of changes to these. Priority has been given in the assessment to the communities most immediately affected by changes to their visual and landscape setting. The chapter concludes that no residual significant effects from the Scheme on human health (including mental health) are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. The Applicant has set out the assessment of socio-economic impacts in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] which identified positive economic effects during all stages of the Scheme's lifetime. Extended assessment information of which economic

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		ANSWER ME THIS: What estimate has been done of the total agricultural yield which will be lost over the lifetime of this monstrosity? How is it proposed that this loss can be replaced without relying on imports? How much gold has been stuffed into the mouths of the landowners. How much per acre of productive land destroyed forever. What wildlife research has been done and what are the results species by species? Would this development be taking place without vast Government subsidy? I can answer that myself - Not It Would Not.		sectors are anticipated to be affected are provided at Section 1.4 of ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation Legislation, Policy, Guidance, and Supporting Information [EN010168/APP/6.3]. Details of landowner agreements are commercially confidential and therefore cannot be disclosed. A comprehensive suite of ecological surveys and studies have been undertaken at the Scheme between 2023 and 2025. Details of methodologies and findings of all surveys and studies are provided in ES Volume 3, Appendix 9-1: Ecological Baseline Report to Appendix 9-7: Wintering Bird Survey Report [EN010168/APP/6.3]. The Applicant confirms that Lime Down Solar Park is being developed solely through private sector financing and that it has not received, and is not receiving any state subsidies, including any contracts, tariffs or grants. The visual impact of the Scheme is fully assessed in the Landscape and Visual

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				Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at PEIR as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by appendices in Volume 3 (12.1 to 12.7 [EN010168/APP/6.3]) has assessed the potential impact of the scheme on identified archaeological and built heritage assets. Where required appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3].
LD2_CLE_397	Site selection and alternatives	NIMBYISM: Yes, I am a Nimby. I do not want this in my backyard, but neither should anyone else have to put up with this grotesque invasion in their backyard either, when that backyard	No	More information regarding how the site was selected can be found in Chapter 4: Alternatives and Design Evolution of the Environmental Statement (ES) [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		is glorious English countryside, helping to feed a growing population. There is a place for everything and the place for solar is NOT on productive agricultural land, which is already subject to serious flooding in severe weather conditions. ANSWER ME THIS: Why has this productive agricultural area been chosen? What brownfield sites were considered? What sites along motorways were considered? What warehouse and industrial sites were considered?		[EN010168/APP/6.3]. In answer to the specific questions: 1. Solar farms are temporary structures and unlike most built development and other renewable energy proposals (such as energy from waste plants) they do not constitute significant permanent development resulting in the loss of agricultural land. Planning policy recognises that solar projects at the scale of the Scheme are likely to use some agricultural land and requires applicants to explain their choice of site, with a preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land (paragraph 2.10.31 of NPS EN-3). In accordance with planning policy, the Applicant has sought to minimise the use of best and most versatile (BMV) agricultural land when selecting the site for the Scheme. As set out in the Site Selection Assessment Report, the Applicant adopted a staged approach in its site selection assessment and initially assessed only non-BMV agricultural land when looking for suitable sites. Due to various constraints, none of the initial potential development areas

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				identified were suitable for the Scheme, and therefore the Applicant widened its search parameters to consider grade 3 agricultural land and some areas of grade 2 land where identified by land agents. On that basis, the site selection for the Scheme is in line with national planning policy regarding use of agricultural land. 2. Brownfield Sites have been considered and are listed in Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. In summary, the Applicant considered the brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites. 3. In its Site Selection Assessment, the Applicant's search parameters required a overall site of around 1,000 ha, made from contiguous land parcels or land parcels close to each other that could be joined together. The Applicant's identified a threshold of at least 40 ha of contiguous land for each individual site. This is the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				minimum site size threshold considered by the Applicant to be viable, based on the balance of costs of connecting infrastructure between individual sites and electricity losses from the multiple connection cabling necessary. Based on these requirements, the Applicant's analysis of available sites within the 20km search area from Melksham Substation did not reveal available sites to locate a scheme of this size along motorways. 4. Please see answer 2 above.
LD2_CLE_397	Climate change and energy need	NET ZERO: The blind pursuit of NetZero is sheer folly of the gravest kind and will merely enable our enemies, totalitarian China in particular, to control and coerce British citizens as we transfer power into their hands. The UK has done more than any other industrialised country to cut back emissions which now amount to about 0.7% of world total. We have led the World but the World is not listening. Solar panels have their place but NOT on productive agricultural land. They should be on rooftops, industrial buildings,	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses these and related comments as part of its application. Note that although other countries may, according to the World Bank report, be <i>more</i> suitable for solar development, (a) any development outside of the UK will need to be linked to the UK grid to contribute to a reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it also does not follow that the UK is 'unsuitable' on an absolute scale for solar development.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		warehouses, supermarket car parks. The World Bank recently listed 210 countries in the world in order of 'suitability for solar' - Namibia came top and the UK came second from bottom, beaten only by Ireland. Bar one, we are The Least Suitable Place on God's Earth to be developing solar - and certainly not by sacrificing productive agricultural land.		
LD2_CLE_397	Project description and DCO process	HOUSE VALUES: I am aware LGD are not obliged to take into account the loss in value to houses in the area, a fact which is, in itself, a scandal. Nevertheless, professional valuers have estimated the total loss in house value to the area would be nearly £155 million. That loss equivalent would go directly to the 9 [REDACTED] namely, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] Already two of the	No	Comment noted. The applicant has produced a Statement of Need [EN010168/APP/7.1] which outlines the need for the Scheme and the benefits it will bring to the UK. There is no evidence to suggest that solar developments have a long-term impact on house prices. It is often the case that any new proposed development—whether housing, pipelines, roads, or electricity transmission—introduces a degree of uncertainty within communities during the planning and construction phases. This can sometimes result in a temporary dip in house prices, but they typically stabilise once the development is completed. The Applicant has also established a Community Benefit Fund which is

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		landowners have put their houses on the market - grab it and run being their obvious maxim. Apart from the wages of the workers, who will almost certainly be immigrants, there is zero benefit to this country at all. By the time the panels are installed their technology will be obsolete with the tax and energy bill payer left to pick up the bill. ANSWER ME THIS: Exactly what benefit will accrue to this country, apart from driving up energy prices, forcing businesses & industry to close or go abroad? Why is zero compensation being offered to those whose properties and businesses are seriously affected? Why are quite such enormous, eye-watering sums being offered to landowners?		designed to benefit the communities living in close proximity to the Scheme. The Applicant acknowledges the strength of local opinion and appreciates that the transition to low-carbon energy infrastructure raises complex and emotive issues. The Scheme is intended to support national energy security and climate commitments by delivering a reliable, low-carbon source of electricity. With regard to property, business impacts, and land agreements, the Applicant is following established legal and planning frameworks. Engagement with affected parties is ongoing, and appropriate mitigation has been considered. Land agreements reflect commercial norms required to secure long-term infrastructure and are negotiated individually with landowners.
LD2_CLE_397	Decommissioning and construction	CONSTRUCTION: If Lime Down gets the go-ahead, this rural area will have to endure about 2/3 years of grossly intrusive construction work daily from 0800-1800 hours. With 500 workers on site, IGPs own estimate is 22 bus trips & 334 car trips daily.	No	Comment noted. More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Nearly 13,000 construction vehicles (+ buses and cars for workers) will come up from J17 on the M4, with another nearly 10,000 from J18. Narrow lanes will be widened, hedges torn out, tons and tons of cement brought in to anchor the panels, despite the fact they will be pile driven - itself causing horrendous noise pollution for months on end. The proposed site is about 15 miles from the grid connection down at Melksham so a trench over 50 metres wide will have to be dug all the way down that corridor to contain three 400 volt cables, destroying yet more valuable agricultural land with compulsory acquisition where necessary. ANSWER ME THIS: Why construct this solar monster so far from the Grid? What alternative sites were considered and why were they rejected? How often will the panels have to be changed, repaired, replaced? What will be done to 'police' the behaviour, at all times, of all the workers on site?		Appendix 4-2: Site Selection Report [EN010168/APP/6.3]. The Site Selection Assessment Report in ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been "scored" to understand which would be the most

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				suitable for the Scheme. The Site Selection Assessment Report concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. As part of the assessment, the Applicant has also considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites. The panel replacement strategy is covered in ES Volume 1 Chapter 3: The Scheme [EN010168/APP/6.1]. To summarise it is anticipated that defective or broken panels will be replaced on an ad hoc basis and that there will be one mass planned replacement (due to take place over a 12 to 24 month period). Security requirements for the construction phase are set out within Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise. The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				[EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects.
LD2_CLE_397	Project description and DCO process	SOLAR PANELS: We are told there will be One Million panels, many of which will be 4.5 metres high and visible for literally miles around. The origin of these panels concerns me greatly. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	No	Based on utilising around 53% of the land available it is estimated there would be no more than 700,000 panels on site. It is noted that a higher figure has been used within the Environmental Statement (ES) [EN010168/APP/6.1] assessment to make sure a 'worst case scenario' is used and potential effects have been fully considered.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		[REDACTED]. France will only allow solar that is ancillary to the farm itself, so mega schemes like this are out of the question. Italy bans solar on farmland and in Germany it is very strictly controlled. Yet, here in the UK, it seems to be a free-for-all. ANSWER ME THIS: What research and consideration was given to using solar panels made in this country or, at least, in Europe? [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] What consultations have taken place with France, Italy & Germany to ascertain why their solar developments are so strictly controlled?		The Applicant recognizes the concerns regarding the supply chain for solar panels, [REDACTED]. As outlined in ES Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1], solar panels and BESS units are likely to be sourced from China or countries of similar distance from the UK. However, we are committed to ethical sourcing and are active supporters of the Solar Stewardship Initiative (SSI), a solar-specific supply chain assurance scheme. The SSI has established a comprehensive environmental, social, and governance standard aimed at promoting a responsible, transparent, and sustainable value chain. To uphold these principles, we will prioritize using PV modules from manufacturers that adhere to the SSI Standards, [REDACTED]. [REDACTED] [REDACTED] Further details on the ethical sourcing of panels can be found in Development Consent Order (DCO) Volume 7: Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_397	Project description and DCO process / Site selection and alternatives / Cultural heritage / Other Environmental Matters (Battery Safety)	BATTERY STORAGE UNIT: With 2,200 acres to choose from, it is sheer madness to locate this unit right by the main railway line to South Wales, let alone within yards of a Grade I Listed Medieval Manor House which features in the Domesday Book and is therefore, by definition, 'of national importance in terms of its architecture, history and social significance.' This house has stood sentinel over its surroundings for over 700 years and yet is deemed suitable to be sacrificed on the altar of NetZero and avaricious greed. The battery units, apart from being an absolute eyesore, apparently emit a constant hum, are surrounded by a 15ft security fence and are intrusively floodlit at night. They will be visible from the upstairs windows of Bradfield Manor and the other fields in Area D will be covered in huge solar panels, up to 4.5 metres high which will also be visible from upstairs windows. The setting of this Grade I Listed Building will be severely adversely impacted, which makes a complete mockery of the very rigid planning rules which apply to such buildings in all other respects. As for the proximity to the railway line, I will leave that to Network Rail; I am sure they will be seriously concerned about the safety aspects.	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Safety Management Plan (OBSSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas (including transport links); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community." Details on site selection and alternatives are detailed including the suitability of the location for BESS in Lime Down D. The Applicant confirms that engagement with Network Rail confirms that they do not oppose the scheme provided the scheme meets requirements which the applicant is working to meet. Fire safety is confirmed in the OLEMP.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		ANSWER ME THIS: Why was this site deemed most suitable? What discussions took place with Network Rail prior to this site being chosen for the BESS? What was the response of Network Rail - did they express concern - have they objected? What discussions have taken place with the Fire Service both local and national? What assurances have been given that local services would be able to deal with a major chemical fire? What other sites were considered for the BESS? Why were they rejected? What lessons have been learnt from, for example, the Moss Landing fire,		Environmental Statement (ES) Volume 1 Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by the Heritage Statement in Appendix 12.1 [EN010168/APP/6.2], provides an assessment of the potential impact to the setting of Grade I Listed Bradfield Manor (NHLE: 1198808). The Assessment identified that with the proposed landscape mitigation there would be a Moderate/ Minor (not significant) adverse effect as a result of proposed Scheme. These effects would begin during the construction phase and would be reversed following decommissioning.
LD2_CLE_397	Project description and DCO process	OWNERSHIP: This worries me greatly and is deliberately concealed from the average person, with flowery language and soft soap words. The process is completely led by the developers who have simply enticed [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	No	Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		██████████. Island Green Power (IGP) is 50% owned by Australian venture capital group Macquarie, which has an appalling and devastating track record of asset stripping, leaving the British taxpayer to pick up the bill, NB the Thames Water debacle. All the eye-watering profits seem destined for Bermuda but no one seems willing to scrutinise the developers, nor question Macquarie's stewardship following their appalling track record. Macquarie should never again be allowed to invest in British developments until they get their own house in order. IGP will almost certainly not be developing this site themselves but, if they get permission, will sell it on at vast profit. This much has been admitted by their local Project Manager, ██████████. They have no intention whatsoever of seeing this project through to completion, let alone being around in 40/60 years to oversee decommissioning. The professional estimate is that they may spend £4/5M seeking permission but, if granted, will sell it on for vastly more. The whole project is estimated to be worth £500M so the scope for megabucks to profiteers is enormous, while the poor bloody locals are trampled underfoot.		Wiltshire Council, as the local planning authority, would be responsible for enforcing the conditions of the consent. Decommissioning liabilities will be taken into account as part of the Scheme financing process. Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. The applicant notes the concerns raised regarding ownership, investment structure, and long-term stewardship of the Lime Down Solar Park. From the outset, the applicant has made clear that it retains the ability both to construct and to own the Scheme throughout its lifetime, while also reserving the right to sell the consented scheme—this is a common and accepted practice in the infrastructure sector. Regardless of future ownership, any party operating the site would be bound by the legally enforceable requirements of the DCO, which will include decommissioning obligations and environmental safeguards.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		ANSWER ME THIS: What scrutiny has been given to the probity of Macquarie directors and what guarantee sought that they will not do to Lime Down what they did to Thames Water? What guarantee will be given that the site will be properly decommissioned at the end of its life? What state will the land be in? What contamination can be expected and how much money will be ring fenced to ensure it is restored to former agricultural glory?		In early 2025, the applicant became a wholly owned subsidiary of Macquarie, further strengthening its capacity to deliver and operate major energy infrastructure. The applicant recognises that public trust is important and reiterates that the Scheme s subject to a rigorous, transparent planning process, including financial and technical scrutiny. Provisions for decommissioning and land restoration will be secured through the DCO process, with financial mechanisms in place to ensure the land can be returned to agricultural use at the end of the scheme's operational life. No harmful contamination is anticipated and further details on this can be found in the Environmental Statement (ES) Volume 1 Chapter 19-Ground Conditions [EN010168/APP/6.1] and the site will be managed in accordance with relevant environmental regulations and best practice throughout its lifecycle.
LD2_CLE_397	Project description and DCO process	CONCLUSION: This site, strung out so widely and so far from the Grid is, to an unbiased disinterested eye, totally and completely unsuitable for this development on so many levels.	No	The Applicant makes note of this comment, but for the reasons set out above considers that the public benefits of the Scheme clearly outweigh any identified residual significant effects on the environment.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		I have outlined some of my own concerns above but there are additional factors like nature, wildlife, flooding etc which others will have highlighted. The project is led solely by subsidy, opportunism, and greed on the part of the nine landowners and the developers. There are no factors in its favour and the local populace and environment should not be sacrificed on this altar to greed. LIME GREEN IS A NONSENSE-ON-STILTS AND SHOULD BE REJECTED IMMEDIATELY IN THE NAME OF SANITY, FAIR PLAY, AND SHEER COMMON SENSE.		
LD2_CLE_400	Project description and DCO process	I am strongly against the proposed Lime Down Solar Project. Whilst I support the need for greener sustainable energy sources I do not believe this is the best way to achieve it. I have attended various consultation meetings hosted by the Lime Down Officials and listened to what is being proposed and still have the following concerns: Loss of open countryside on a vast scale	No	The Applicant makes note of this comment. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and the resulting destruction of rural communities and its wildlife. Effects on footpaths and bridleways. The loss of agriculture land and the effect this will have on our food security. The danger of increased frequency and intensity of flooding to nearby villages caused by the loss of permeable farmland The battery storage system introduces the danger of toxic gas emissions and fires which are known to be difficult to extinguish resulting in multiday evacuations The regular use of chemical herbicides that will be required to control the growth of unwanted plant materials around the solar panels The increase in HGV traffic during the construction period The Lights, noise, glint and glare will destroy the rural landscape as we know it.		from the layout assessed at PEIR as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed visual and ecological mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. A detailed assessment of the likely significance of effects of the Scheme on the use and desirability of PROWs, permissive routes and long-distance recreational routes has been included in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] with assessment of

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		All of the above points are a huge cause for concern and are and will continue to cause stress, anxiety and have a detrimental effect on the mental health of people living in the communities affected.		individual routes and receptors in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. The assessment identifies potential for some significant adverse effects during construction, peak replacement works and decommissioning. The Scheme seeks to minimise disruption to the use of PRoWs during construction. Diversions or closures to facilitate construction works will only be undertaken where necessary, and will be temporary in nature with signage and prior notice provided as set out and secured through the Outline PROW Management Plan (PROWMP) [EN010168/APP/7.17]. During the Scheme's operation, the routing of all PRoWs is preserved. PRoWs will also be given a minimum 15m setback to the nearest solar PV structures, with 2.5m deerstock fencing set approximately 10m from the PROW centreline. Where PRoWs run along hedgerows, the hedgerows will be retained. PRoWs will be kept clear with surrounding areas planted only with low-level groundcover (such as wildflower meadow mix) to retain a more open aspect

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				along PRowWs. Additional landscape and ecological enhancement planting with help to visually separate recreational users from onsite infrastructure. The Outline PROWMP [EN010168/APP/7.17] requires the reinstatement of any PRow furniture, enclosures, and surface treatments where they are altered or damaged by construction activities. The Applicant is also open to exploration of improvements to PRow access through removal of stiles and gates to create better access for PRow users without encouraging nuisance behaviour. This is likely to be delivered through the Community Benefit Fund in coordination with Wiltshire Council's Public Rights of Way Team. Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs</i>,

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				<i>Agricultural land use in England at 1 June 2024).</i> It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to

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				be used only for maintenance and security purposes. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Sites and Cable Route Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] presents an assessment of Glint and Glare from the Scheme on surrounding receptors (including rail, roads, residential properties, aerodromes, PRowS and the CNL). The assessment concludes that with the implementation of mitigation measures such as use of 2.5m fixed panels where required no significant effects are predicted as a result of the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan (CEMP)[EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of determinants of health, with mental health aspects to them. This includes assessment of impacts on access to housing, access to open and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme.
LD2_CLE_405	Project description and DCO process	Dear sir/madam. I am writing to object to the Lime Down Solar Park. I have viewed your second consultation plans and wish to comment on it. Your proposed plan is going to cover 3 square miles of quality agricultural land with solar panels and a battery storage unit. I strongly disagree with covering English countryside with a massive solar park. Solar panels should be put on factory/house roofs, or carparks, and alongside motorways/railway lines first. This will provide a great deal of solar energy before agricultural land is covered.	No	Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that “Solar energy is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Already within the Wiltshire area, there are many solar panel parks in the countryside. I do lots of walking and end up having to walk through fields of solar panels. It is unpleasant, ugly and devoid of any wildlife. No bird song, no animals, just metal fencing, black solar panels and the buzz sound of associated equipment. Too much farmland is being covered in solar panels , when it should be growing crops. The UK has the ability to grow its own food and crops for animals without having to import crops from abroad. We need to protect our fields and not cover it with solar panels. I don't believe the company Island Green Power has any morals about using UK land to make money for itself . It will buy and store electricity when it is cheap and sell it back to grid at an inflated price. This is not looking after the UKs interest but just a money making enterprise just for themselves and not the greater good of this country. Do not go ahead with this massive destructive plan. I do not think it is correct .		the economy" (p15). The Roadmap talks to the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because "Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale" and "Speed of deployment is also a huge benefit of solar" for both ground mounted and rooftop schemes (p15). This "makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets." The Roadmap includes illustrative deployment scenarios which "show that reaching the Clean Power 2030 range is achievable, but will require significant action" (p16). Large-scale solar represents 60-65% of the UK's installed solar capacity by 2030 in the Roadmap's illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range through the illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in

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				deployment of these schemes must be made up for by other technologies, including from large scale schemes. These publications make it clear, and the Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme. Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites.

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				The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. Food security will not be compromised by the Scheme (or solar energy more widely) - in 2024, solar used 7,100ha of agricultural land, half of which was also used for some form of agricultural production. In the same year, 581,000ha of arable land was uncropped. Although food security is not simply a measure of the quantity of food produced in the country, there are large areas of uncropped arable land in the country and continually increasing productivity within the agriculture sector that offset the use of

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				agricultural land for solar power generation. The position of the UK government is that solar farm developments are not a threat to UK food security and there is no established link between solar schemes and reduced food security. Instead, the UK government considers that climate change is the greater threat to food production and security and the livelihoods of farmers. The UK has always imported foods that cannot be grown in our climate and the proportion of food produced in the country relative to the food consumed has remained steady over the last two decades. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme been fully assessed within the ES. Existing solar

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				farms are considered in the baseline of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]). Forthcoming solar developments are assessed within the cumulative and in-combination effects section of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]) and summarised in ES Volume 1, Chapter 21: Cumulative and In-combination effects. The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. Potential impacts of the Scheme are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. This assessment considers all phases of the Scheme, including the construction phase, and describes appropriate measures to avoid or mitigate identified impacts. Fencing around solar panels will be permeable to all wildlife except deer, meaning animals (excluding deer only) will

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				be able to freely access habitat within solar array without the need for wildlife gates. Fencing will be regularly maintained and inspected for integrity. Wide buffers will be retained around the peripheries of the Solar PV Sites which will allow all wildlife including deer to move between favoured habitats. Fencing will not impede movement of wildlife which migrate seasonally, most prominently birds. Ecological mitigation and enhancement measures for birds, including areas to be set aside for the benefit of ground-nesting birds (particularly skylark) are described in ES Volume 1, Chapter 9: Ecology and Biodiversity. The Applicant notes the concerns about the reasons behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant recognises that both landowners and the local community are key stakeholders. While landowners will receive a lease income, as in normal in any commercial lease agreements, the

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				Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit initiatives, which will be developed in consultation with local representatives. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.
LD2_CLE_406	Project description and DCO process	LIME DOWN CONSULTATION RESPONSE – By [REDACTED] Q2 IN LIME DOWN WEBSITE RESPONSE OPINIONS OF GROUND-MOUNTED SOLAR This question is designed to produce a	No	The Applicant notes this comment. The feedback form included both closed and open questions designed to capture both quantitative and qualitative feedback. In addition to the high-level questions on the principle of ground-mounted solar infrastructure, respondents were encouraged to provide detailed comments on aspects of the Scheme most important to them, which are reflected and considered within the Consultation Report [EN010168/APP/5.1].

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		misleading answer. In its current form it invalidates itself. Whether one is in favour of ground-mounted solar or not depends on the alternatives and the relative costs. Are we in favour of solar panels on Hyde Park or next to Badminton House? A solar panel on a ware-house roof or (as in the case of HM the King at Sandringham) sensitively hidden out of sight is quite different from a million panels obliterating 1150 acres of productive agricultural land, creating a dystopian industrial complex and destroying landscape views. Whether one is in favour of ground-mounted solar energy (or any form of electricity generation) depends on a variety of factors which the question does not mention. You might as well ask "Are you in favour of rain?" We are all in favour of rain but not every day and never in the form of monsoons. To elicit a meaningful response from the		

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		public, the question should have been sub-divided into a variety of alternatives whilst providing a fact sheet setting out the advantages and disadvantages of each option.		
LD2_CLE_406	Climate change and energy need	MEGA-SOLAR IS VERY INEFFICIENT Solar(10.5% load factor) is much more inefficient than onshore wind (24.9% load factor) and offshore wind (43% load factor): https://www.statista.com/statistics/383314/average-renewable-energy-load-factor-in-the-united-kingdom-uk/ Nuclear power has typical load factors of 70-90%. CCGT has an average of 56%. Both are massively more efficient than solar. Why did IGP draft Q2 without providing nuances to take into account actual (as opposed to artificially 'levelised') costs of generation of solar v CCGT, onshore wind, offshore wind, biomass and nuclear, the costs of double-banking CCGT power stations to provide power when intermittent renewables are inadequate.	No	The comments provided appear to conflate efficiency with load factor and reference some inaccurate information. For instance, no Combined Cycle Gas Turbine (CCGT) projects were awarded contracts in the 2024 Contracts for Difference (CfD) allocation round, as CCGTs are not eligible under the CfD scheme. Additionally, the cost of electricity from CCGTs is higher due to carbon pricing, which reflects the environmental cost of carbon dioxide emissions—a major contributor to climate change. In contrast, solar power systems typically achieve efficiencies above 20% (converting sunlight into electricity), rely on free and abundant solar energy rather than volatile fossil fuels, and produce no carbon emissions during operation. This makes them a stable and environmentally responsible energy source. The UK Government has set a clear policy direction: by 2050, the majority of the

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		That could have provided meaningful answers. IGP should address this in its response to the consultation, as their staff have consistently asserted at their public events and at private meetings with me that solar is not subsidised. This is demonstrably untrue, as the market is rigged in favour of inefficient intermittent renewables (a) through renewables obligations and carbon taxes. CCGT costs are artificially inflated by the need to operate power stations inefficiently, reducing supply to make way for renewables when the sun shines or wind blows. (b) Solar and other renewables are paid vastly more than CCGT through CfD prices set well above market levels by the government and guaranteed by the taxpayer/electricity consumer for 15 years. The 2024 round offered £84 per MWh for solar compared with £56 for CCGT. The £28 per MWh difference is added to consumers' bills or funded by taxes. This is why UK has the highest electricity prices in the world, major cause of fuel poverty and de-industrialisation.		country's electricity will be generated from renewable sources, primarily wind and solar. The Statement of Need [EN010168/APP/7.1] addresses how these technologies can work together efficiently to meet the UK's electricity demand.

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		No mega scheme like Lime Down would be commercially viable but for Government coercion of consumers and taxpayers. That is why rent-seeking multi-millionaire millionaire investors and landowners are currently engaged in a “Klondike gold rush” to feed at the subsidy trough.		
LD2_CLE_406	Project description and DCO process	WHO BENEFITS FINANCIALLY FROM LIME DOWN? Lime Down’s investors are (a) Macquarie (an Australian corporation) as to 50% and (b) 6 Irish multi-millionaires (the remaining 50%). The developer, Lime Down Solar Ltd is owned by IGP Projects Ltd, which is itself owned by Island Green Power Ltd. Lime Down Solar Ltd has never filed any accounts or list of shareholders at Companies House and lists no person with significant control. IGP Ltd is based at a shoe-box accommodation address: Unit 25.7, Coda Studios, 189 Munster Road, London SW6 6AW. This is a 300 sq ft single room	No	The Applicant acknowledges the concerns raised around the commercial arrangements with landowners and the broader investment setup for the Scheme All land agreements are negotiated on a case by case basis and are commercially confidential. That said, the applicant can confirm these agreements follow well-established industry norms and are considerably lower than the figures mentioned in the comment. The Scheme is backed by long-term infrastructure investors, whose involvement helps make large-scale, complex energy projects like Lime Down possible. The goal is to support the UK’s shift to a more secure, low-carbon energy system, in line with national policy. Investment returns reflect the level of risk

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		amongst 27 such units on the fourth floor of a serviced office building. IGP Ltd has filed no list of shareholders or persons with significant control. According to IGP's accounts filed at Companies House, it is ultimately based in Clarendon House, 2 Church St., Hamilton, Bermuda, a foreign tax haven. IGP's managing director [REDACTED] is an Irish citizen and listed at Companies House as a director of 50 other companies like IGP. The other director, [REDACTED] is an Irish citizen resident in Spain, who is a director of 48 companies connected with [REDACTED] all of which are based at the same 300 sq ft serviced office. 9 Wiltshire landowners will be paid £1500 per acre index-linked for the lifetime of the project. Many of these are extremely wealthy like the Duke of Beaufort but, given the average price per acre of £9,240 in North Wiltshire, even working farmers like [REDACTED] with 1000 acres, of which 180 are in Lime Down, are also worth many millions.		and regulatory demands tied to this kind of infrastructure and are not driven by short-term or speculative profit.

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		The major part of Lime Down's prospective billions of pounds in profits will be derived from artificially inflated electricity bills. Thus their business model is to siphon money out of the pockets of ordinary people (including those who have just lost their winter fuel allowances) and transferred it to the Australian billionaire corporation (which asset-stripped Thames Water plc) and 6 Irish multi-millionaires. Neither [REDACTED] nor the 6 Irish multi-millionaire speculators will have any long-term interest in this project beyond the grant of a Development Consent Order. It will be flogged off to a pension fund or other passive investor because of the index-linked income-stream guaranteed by the Government for at least 15 years under current rules, whatever the subsequent fluctuations of energy prices. It is difficult to imagine a more regressive policy – reducing the nation's wealth through a perverse allocation of resources (duplicating electricity-generating capacity to compensate for renewables intermittency and maintain grid stability) and making the poor pay for the privilege of lining the pockets of a billionaire foreign corporation		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and 6 foreign multi-millionaires who are not 'investors' but 'rent-seekers'.		
LD2_CLE_406	Climate change and energy need	WHERE WILL IGP SOURCE THE SOLAR PANELS? IGP should come clean on where they expect to source the 100,000 solar panels for Lime Down. China has 80% of global manufacturing capacity of solar panels and has operated a predatory pricing policy to maximise market share as a geo-political strategy. China absolutely dominates global solar panel production, accounting for nearly 80% of annual output. Its control over the solar industry goes beyond just manufacturing and extends to the entire supply chain, including the production of almost 80% of the silicon essential to solar panels. The paradox is that most of this silicon is produced from coal. Metallurgical grade silicon (MG-Si) from the smelter, usually of 98% purity, does not	No	Embodied carbon from silicon is considered within the Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1], section 7.10 paragraphs 7.10.13 to 7.10.16S . As outlined in the Chapter, the silicon assumptions are sourced from the Global Silicon Council document "Silicon-Chemistry Carbon Balance: An assessment of Greenhouse Gas Emissions and Reductions".

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		meet the purity requirements of the photovoltaic industry, it must undergo two more energy-intensive processes before it can be made into solar cells and then into panels. Firstly, the Siemens Process converts metallurgical grade silicon (MG-Si) from the smelter into polycrystalline silicon (called polysilicon) by using an extremely energy intensive process, a high-temperature vapor deposition process (Troszak 2019). The purity requirement for solar grade silicon (SoG-Si) is currently 9-11N (99.999999999%), a factor of 10.000 to 100.000 more pure compared to the 5-6N purity required for solar PV a decade ago. In the Siemens process, silicon is crushed and mixed with hydrochlorous acid (HCl) to create Trichlorosilane gas (SiHCl₃). This gas is heated and deposited onto very hot rods of polysilicon (1.150C) while the reaction chambers walls are cooled. Each batch of polysilicon “rods” takes several days to grow, and a continuous, 24/7 supply of electricity to each reactor is essential to prevent a costly “run abort.” Polysilicon refineries depend on highly reliable conventional power grids, and		

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		usually have two incoming high-voltage supply feeds. (Sources Mariutti and Schernikau 2024, unpublished academic paper, Troszak 2019). Secondly, the Czochralski Process turns the liquid silicon metal from the smelter and doping materials (gallium or phosphorous) into the silicon ingot, a large monocrystal, 20-30 cm diameter and 1-2 m in length. Next, the ingot is sawed into rectangular bricks, which are sliced into wafers using a diamond wire sawing process (Figures 3 and 4). This process requires several days, and uninterrupted 24/7 power supply. An ingot/wafer/cell plant can use more than 100 MWh additional energy per ton of incoming polysilicon, which is about 6 times as much as the original smelting of the silicon from ore. Estimates of the energy and therefore CO2 footprint of silicon purification and wafering also diverge widely in the academic literature, mainly due to two reasons. On the one hand, there is no agreement on the estimated energy demand for these core processes. For example, solar grade silicon (SoG-Si) is the most energy-intensive step in the silicon purification process and should		

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		best be understood. Yet, SoG-Si inventories report an electricity demand ranging from 50 kWh/kg to 110 kWh/kg, which appears quite low. On the other hand, secondary and pre-smelting processes are rarely included when considering the definition of an energy footprint, applicable to the average Chinese silicon industry. Currently, reporting used by governments for decision making, tend to be based on best-in-class plants, like in Europe or North America, which is far removed from reality. Once wafers are produced a few more steps are required before we have a ready-made solar panel. All of these steps require a significant amount of energy in addition to the raw materials required to build the factories and machines, the running of processes and operations, and the supply of electricity and heat required to perform these processes. - Wafer sawing: Silicon “bricks” are sliced into thin wafers for later manufacturing of solar cells - Solar cell and module production: requiring aluminium, glass, copper, plastic, rare		

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		earths, acids, and over 400 chemicals - Mounting structure supply: requiring aluminium or steel frames, cement foundation, etc. - Transportation: everything needs to be transported to the point of use I am not covering decommissioning and disposal of solar panels here. But it will suffice to mention that the average operational lifespan of the newest utility scale solar panels, is a fraction of the 20-25 years marketed in the media, proving to be more like less than 15 years - While older solar panels used to “live” longer, newer ones are optimized for the lowest raw materials and energy use, negatively impacting lifespan. Libra et al 2023 details that after about 10 years, serious failures of 1st tier (bankable) PV panels occur at an increasing rate It is obvious that decommissioning and disposal, and certainly any recycling, also require energy and also equipment made out of raw materials.		
LD2_CLE_406	Climate change and energy need	The carbon footprint of solar ‘parks’ (in reality, ‘industrial complexes’) ought to be the subject of inquiry as part of the planning process, given the stated reason for the government rigging the market and forcing	No	The GHG emissions are considered in Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1] with regards to the likely effectiveness of the Scheme in

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		consumers to pay much higher prices for solar energy than would arise from fossil-fuel generation. Although the planning guidance states that net zero is a 'critical national priority,' this cannot be taken in isolation from the myriad other competing considerations of government policy and associated legislation. Ultimately, the Planning Inspectors' report to the Secretary of State must weigh the relative importance of competing policy considerations and the true contribution of solar panels to reducing carbon emissions must involve a calculation of the carbon cost of the complete process of manufacture, transport, construction and operation of solar NSIPs.		comparison to a scenario without the Scheme being built.
LD2_CLE_406	Climate change and energy need	UNSUITABILITY OF UK FOR SOLAR ENERGY The World Bank recently produced a report on Global PV Power Potential by Country. The UK is listed in 209th place out of 210 countries, with the Irish Republic in 210th place.	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses these and related comments as part of its application. Note that although other countries may, according to the World Bank report, be <i>more</i> suitable for solar development, (a) any development outside of the UK will need to be linked to the UK grid to

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		The UK is on the 51st parallel, which means days are long in summer and short in winter. It is also on the edge of the Atlantic Ocean, with weather systems which produce a great of cloud and rain. Solar energy in the UK is least productive in winter when demand is highest and most productive in summer, when demand is lowest. This is a material consideration in weighing the relative importance of contribution to net zero and the destruction for at least 40 years, and probably forever, of the setting of the [REDACTED] in which I live.		contribute to a reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it also does not follow that the UK is 'unsuitable' on an absolute scale for solar development.
LD2_CLE_406	Cultural heritage	PROPORTIONATE LOSS TO HERITAGE MUCH GREATER THAN TRIVIAL CONTRIBUTION TO NET ZERO [REDACTED] is one of only 9000 Grade I listed buildings in the whole of the UK. Lime Down's 100 or so acres of land within our sightlines would produce trivial amounts of the UK's electricity. Total heritage cost of destruction of [REDACTED] landscape setting with (a) thousands of solar panels the size of a	No	Environmental Statement (ES) Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by the Heritage Statement in Appendix 12.1 [EN010168/APP/6.2], provides an assessment of the potential impact to the setting of [REDACTED] (NHLE: 1198808). The Assessment identified that with the proposed landscape mitigation there would be a Moderate/ Minor (not significant) adverse effect as a result of proposed Scheme. These effects would begin during

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		double-decker bus, (b) up to 270 giant batteries in the BESS and (c) the 15 metre high 400,000 volt substation would be wholly disproportionate to their contribution to Net Zero. The proportionate damage to the UK's stock of buildings of national architectural and historic importance would be much greater than the vanishingly small reduction in CO2 emissions claimed for the solar panels. 40 years ago, HM the King once described a catastrophically ugly proposed extension to the National Gallery as like "a monstrous carbuncle on the face of a much-loved friend." https://www.youtube.com/watch?v=UOEQLkg5Xlk The project was cancelled – to the lasting benefit of the nation and the world as the Classical 19th century gallery was not defiled to feed a passing fad. It would cost nothing in national policy terms to exclude from Lime Down's project the 100 acres of carbuncular solar panels planned to		the construction phase and would be reversed following decommissioning.

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		desecrate [REDACTED] setting. The nation would gain and the only losers would be the avaricious landowner, [REDACTED], who would sacrifice his 30 pieces of silver (actually several millions of pounds) and the multi-millionaire foreign 'investors' who would lose their hundreds of millions of pounds in forced payments extracted from the pockets of ordinary people through higher electricity prices. What alternatives were actively considered to enable Lime Down to avoid destroying Bradfield Manor's setting?		
LD2_CLE_406	Other Environmental Matters (Battery Safety)	BESS In the context of [REDACTED], the decision to site the BESS adjacent not only to us but also to the main-line rail link from Paddington to South Wales defies comprehension. Lime Down extends to over 2200 acres. Out of all that land it is hard to imagine a less suitable location. Ion-lithium batteries are notorious for failing unexpectedly and causing a thermal runaway as at the world's biggest grid	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Storage Safety Management Plan (OBSSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities,

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		battery complex at Moss Landing, California last January – requiring the evacuation of thousands of residents and the closure of US Highway 1. Siting the BESS next to an arterial rail route creates a wholly unnecessary risk which can easily be avoided. It is also an obvious terrorist target – a terrorist-inspired explosion could hit the headlines in the same way as Moss Landing, which went viral. What alternative sites has IGP seriously considered which avoid this risk? How much per acre would the landowner be paid for siting the BESS on his land. It is rumoured that this is vastly greater than the £1500 per acre for the solar panels? The public, who will be lining the landowner's pockets, have a right to know. What financial provision is Lime Down making to ensure that Wiltshire & Dorset fire service is equipped to deal with a thermal runaway? If a DCO is granted, IGP and the 'investors' stand to make billions of pounds.		workplaces, transport links, etc.); and To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.

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		What provision for compensation to those affected do they propose to meet the risk of closure of the railway? The main purpose of the BESS is to take power from the grid when it is cheap and sell it back again when it is more expensive. A BESS could be sited anywhere for this purpose – preferably close to the grid connection and certainly not 13 miles away, next to an arterial rail route and a Grade I listed building. This BESS is included primarily to provide a highly attractive income-stream, not from the Lime Down solar panels but from arbitrage purchases from the National Grid – buying cheap and selling back dear. Lime Down should be required in the interests of transparency, given the project's dependence on public subsidy, to publish the financial information about the profits from this exercise included in their business plan. The public has a right to know how much		

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		money the grifter 'investors' expect to make at the public expense.		
LD2_CLE_406	Project description and DCO process / Site selection and alternatives	HOW WAS LIME DOWN'S SITE CHOSEN? Lime Down stretches out over 11 miles in 5 separate sites, each of which qualifies as an NSIP. There is no national strategy to guide the siting and shape of mega solar projects. At the moment, they are driven entirely by the commercial greed of complicit landowners and the developers. IGP should be required to provide an explanation of why they chose to site this project (a) 20 km from the grid connection (b) in 5 separate disconnected sites covering an area 10 km east-west and 5km north-south (c) requiring tunnelling under the main-line railway and the M4. It is hard to imagine a worse-designed scheme. In fact, it is obvious there is no design; just the random result of opportunistic landowners' greed at the public expense – a policy of soak the poor to benefit the rich. This is the opposite of strategic land use	No	The Applicant notes these comments and confirms that the location of the Scheme has been chosen through a thorough site selection process which is explained more fully in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and assessed against relevant planning policy in the Planning Statement [EN010168/APP/7.2]. For the Solar PV Site, in total, 12 sites were assessed and it is considered that there are no more suitable locations within the search area than the proposed location for the Scheme based on the criteria identified. The Scheme's location is therefore assessed to be suitable for the scale of solar development proposed and the basis on which the Applicant has selected the Solar PV Sites accords with the consideration of alternatives set out in NPS EN-1 and NPS EN-3. The Applicant confirms that both the technical and commercial viability of all aspects of the Scheme including the proximity to the connection point, have been assessed, and a cumulative impact

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		planning. It is akin to the ribbon development of the 1930s, which led to the planning controls introduced in the Town & Country Planning Act 1947. The current lack of strategic planning offers the prospect of the random destruction of the countryside for personal gain, whilst making trivial intermittent contributions to net zero. This is an irrational outcome. Proximity to a grid connection and compaction of sites should be material planning considerations in every application for a DCO.		assessment has been undertaken and is reported within ES Volume 1, Chapter 21: Cumulative and In-combination effects [EN010168/APP/6.1]. This includes consideration of other proposed solar farms in the vicinity of the Scheme. ES Volume 2: Figure 21-2 Location of Cumulative Solar Infrastructure [EN010168/APP/6.2] shows the location of other solar farms in proximity to the Scheme. The assessment concludes that traffic flows do not significantly change as a result of the cumulative scheme.
LD2_CLE_406	Project description and DCO process / Climate change and energy need	LAND RESTORATION What financial bonds/sinking fund will be created to guarantee the restoration of the affected land at the end of the project (said to be 40-60 years)? It is highly unlikely that restoration costs could be recouped from return to agriculture. In any event, the restoration costs should be part of Lime Down's costs matrix. It would be quite unacceptable for the 'investors' to make huge profits from selling the right to an index-linked, taxpayer-guaranteed income-stream for two generations without putting in	No	Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement. Wiltshire Council, as the local planning authority, would be responsible for enforcing the conditions of the consent.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		place a reciprocal guarantee that they will put up front the funds to pay for the removal and safe disposal of the panels etc and to fund the costs of restoring the land to productive agricultural use. I am not aware that there is any such credible proposal. It is a one-way bet for the developers, whose aim is to sell at the earliest and most profitable moment, leaving the future to look after itself. ██████████ 50 of these companies. None of his companies has any experience of continuing to run these projects beyond the development stage – nor any intention of doing so. They are ‘get-rich-quick’ schemes sucking on the taxpayer teat. Macquarie famously bought Thames Water, loaded it with debt, paid out huge dividends to shareholders and now the wreckage left behind will probably be bailed out by the taxpayer. This is a national scandal which should disable Maquarie from consideration as a develop of NSIPs. What assurances will the developer give that he will retain ownership and be accountable		Decommissioning liabilities will be taken into account as part of the Scheme financing process. Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited which is 100% owned by Maquarie Asset Management As a group, Macquarie has invested in the UK’s green-energy sector since 2005, and in total has arranged or invested more than £60 billion in UK infrastructure since 1999, including renewable energy projects. In 2022 Macquarie committed £12 billion of investment specifically for sustainable infrastructure across the UK, including solar generation and battery storage capacity. Worldwide, Macquarie is supporting over 90 GW of green projects in development, 2 GW in construction and 14 GW in operations, and has invested or arranged £34 billion in funding specifically in green energy projects since 2010.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		to the public for delivering on the promises of efficient stewardship and land restoration at the expiry of the project's life?		
LD2_CLE_406	Project description and DCO process	COSTS OF CABLING TO THE GRID I have been told that the cost of the physical cable alone to connect Lime Down to the grid will be about £100,000,000, let alone the cost of trenching it for 13 miles. IGP should be required to disclose the extra costs of cabling so far from the grid and also publish the carbon costs of the cabling. This is a massive misallocation of resources, which a national plan for NSIPs would avoid. If we are to have massive solar projects - rather than concentrate on the 650,000 acres of south-facing roofs which the CPRE says could be used for panels to achieve the same result – they should be compactly designed and as close as possible to a grid connection to reduce unnecessary cost and disruption to people's lives. There needs to be a national plan to implement the CPRE proposal, which could achieve the same net zero objective but without ruining people's lives, destroying	No	The Applicant confirms that the technical and commercial viability of all aspects of the Scheme have been assessed, including the necessary infrastructure to connect the Solar PV Sites to the grid connection point at the existing Melksham substation along the full length of the cable route corridor. The Applicant notes comments regarding rooftops and confirms this point is further addressed in the Statement of Need [EN010168/APP/7.1] The Applicant confirms that the location of the Scheme has been chosen through a thorough site selection process which is explained more fully in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and assessed against relevant planning policy in the Planning Statement [EN010168/APP/7.2].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		residential property values and engendering public opposition to the policy objective. Why has IGP not sought to create a business out of putting solar panels on roofs rather than productive agricultural land?		
LD2_CLE_406	Soils and agriculture / Climate change and energy need	FOOD AND ENERGY SECURITY The UK is only 46% self-sufficient in temperate food products. Yet 26% of Lime Down's land is Best and Most Versatile – grade 3a and above. In practice grade 3b land is perfectly productive and the fields around us have grown cereals and beans every year. Our own fields are grassland and have been used for cattle and sheep as well as growing silage and hay. This has been traditional agriculture for hundreds of years. The Covid pandemic emphasised the fragility of our current lack of food security. The growing dependence on intermittent renewables exposes us also to dangerous threats of black-outs as we have become excessively dependent on LNG imports for electricity base load and to balance the grid when renewables fail. We are also	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] to address these and related comments as part of its application. Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		excessively exposed to dependence on China, a [REDACTED], not least by control of the raw materials for renewables schemes. The UK is a large net importer of energy, having imported 33,000 GWh of electricity in 2023, compared to exports of just 9,000 GWh. We are now excessively dependant on the cross-Channel and North Sea interconnectors, which are beyond our control and subject to foreign governments prioritising their own needs above ours. The Norwegian government collapsed in January over energy exports. The Norwegian public has been facing soaring energy prices in recent years, which critics have blamed on exports via the inter-connector cables. In 2022, when Norway opened inter-connectors to Britain and Germany, prices in the south of the country – where the cables connect to – soared by a factor of 10. Norway is a key source of electricity for Britain when the nation's own power		(NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Further assessment of food security and soil quality can be found in Environmental Statement (ES) Chapter 16: Socio Economic, Tourism and Recreation and Chapter 17: Soils and Agriculture [EN010168/APP/6.1].

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		supplies dip. Norway generates energy from its hydroelectric power facilities, which offer a stable source of electricity in contrast to intermittent solar and wind. On the weekend of 25/26 January, Norway provided 4% of the UK's electricity needs due to the collapse of wind and solar during the dunkelflaute. If the interconnectors were disrupted by supply being cut off to meet supplier domestic needs or through Russian espionage (a major reason for the scrapping of Nordstream in Germany), the National Grid would be in danger of having to ration power. https://www.telegraph.co.uk/business/2025/01/31/blackout-britain-threat-rises-collapse-norwegian-government/		
LD2_CLE_406	Project description and DCO process	[REDACTED] IGP pays lip-service on its website to opposing modern slavery. It is also contrary to the policy of HM Government. According to the trade union Unison: “Solar energy is an essential part of the	No	The Applicant recognizes the concerns regarding the supply chain for solar panels, [REDACTED] As outlined in Environmental Statement (ES) Chapter 7: Climate Change [EN010168/APP/6.1], solar panels and BESS units are likely to be sourced from China or countries of similar distance from the UK.

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		UK's plan to reach net zero by 2030. However, because polysilicon can be blended at the ingoting and wafering stage, and upwards of 95% of the world's ingots and wafers are made in [REDACTED] [REDACTED]		Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that our supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source our panels from factories that are SSI-accredited. Further details on the ethical sourcing of panels can be found in Development Consent Order (DCO) Volume 7: Outline Skills, Supply Chain and Employment Plan [EN010168/APPI/7.20].

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		[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] 95% of the world's solar panels rely on the primary material 'polysilicon'. Over 45% of the global supply of this component is manufactured in the [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] Multiple UK public sector bodies have been found to procure solar materials from companies sourcing polysilicon from the region, including the Ministry of Defence. As the UK's solar capacity sets to double by 2025, concerns are mounting that councils and other public service bodies will get locked into long-term contracts with		

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		unethical suppliers. Finding alternative suppliers is both a humanitarian and an environmental priority. China is the planet's biggest polluter, and the Uyghur region is the government's national hub for oil, gas and coal. ██████████ but lax national environmental standards allow companies to drill into the ██████████ natural resources and fuel their factories with cheap coal. Consequently, solar panels made in the region have higher carbon footprints than those manufactured elsewhere in the world." The Helena Kennedy Centre for International Justice has reported that: • The Uyghur Region now accounts for approximately 35% of the world's polysilicon (down from 45%) and as much as 32% of global metallurgical grade silicon production. • The vast majority of modules produced globally continues to have exposure to the Uyghur Region. Production in China significantly increases exposure. • Some of the world's largest module		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		manufacturers appear to have bifurcated their supply chains to create a product line that they claim to be free of XUAR inputs, though evidence of these claims varies by supplier. Most companies have suggested that these supply chains are dedicated to the US market or designed with UFLPA compliance in mind. The portion of modules made by China-based companies on these dedicated supply chains appears to range from 7–14% of the companies' total production capacity globally. • Companies that have created supply chains purportedly free of XUAR inputs continue to source from suppliers or sub-suppliers that have exposure to the Uyghur Region for other product lines. • It is sometimes impossible to determine if it is indeed the case that these dedicated product lines are XUAR-input-free because companies do not disclose sufficient supply chain information. In these circumstances, we need an absolute assurance that no Chinese panels will be used as part of the Lime Down project and, if not, we need to see a comprehensive and credible plan from IGP to ensure transparency by publication of all contracts to purchase solar equipment		

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		together with sourcing details. I do not believe that IGP has done any work yet on sourcing materials. The company employs only 26 people for the many dozens of projects it is promoting. However, to bolster the company's bona fides in this matter, we need to know what companies IGP has in mind to supply solar panels and other materials which may be sourced from China and what non-Chinese suppliers IGP has in mind to use in preference. ██ ██ ██ ████████████████████		
LD2_CLE_406	Transport and access	TRAFFIC IMPLICATIONS OF THE CONSTRUCTION PERIOD The lane from the A429 to Sherston is already very busy. I gave up running on it years ago on account of the growing amount of traffic. More housing (70 new houses are about to be built in Hullavington) exacerbates the problem.	No	Part of the road from the A429 to Sherston forms the construction vehicle route to a single area of the Site - Lime Down D. Traffic surveys presented in Table 13-8 of the in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] indicate that 2,925 vehicles currently use this road on an average day (24 hour period). Of these

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		During the 2-3 year construction period of the Lime Down monstrosity, nearly 13,000 HGVs will thunder down this lane which was never designed for such vehicles. Buses and cars for workers will also come from Junction 17 on the M4 and clog the lanes at peak times. Another 10,000 vehicles will come from Junction 18 via Grittleton. The volume of traffic which will be generated will be noisy, polluting and potentially dangerous, given the narrowness of the lane and its sharp bends. Protocols for HGV drivers and bus drivers are likely to be ignored, especially if they are on piece-work. We need to see the detail of how many people IGP propose to employ to police their protocols and what sanctions and independent verification are to be in place to ensure compliance.		movements, 130 are classified as HGVs. Table 13-6 indicates that, on a busy day, there could be 46 additional HGV movements associated the construction of the Scheme (23 arrivals and 23 departures). On a typical day, the number will be lower than this. It should be noted that any agricultural movements associated with the existing land will no longer occur. Proposed construction vehicle routes are set out in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [E N010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the

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				local highway network is minimised, including restricting HGV arrival and departure times so that they do not conflict with peak commuter times and school drop-off/pick-up times. Outside of the identified construction vehicle routes, there will not be transport and access effects. The CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.
LD2_CLE_406	Community benefits and impact	COMMUNITY BENEFITS IGP's Consultation Feedback form Section 6 states "We believe those communities living closest to the proposed project should benefit from it – wit those communities being best placed to recommend what a 'community benefit should be". As the project has already caused a substantial reduction in the value of the houses most affected, I believe IGP should put their money where their mouth and compensate my wife and me for the	No	The Applicant acknowledges the concerns expressed regarding property values and the perceived impact of the proposed Lime Down Solar Park on nearby homes. While property valuation falls outside the scope of the planning regime, the Applicant is committed to engaging constructively with local residents and is considering a range of measures to ensure that those living closest to the scheme can see meaningful, long-term benefits. The structure, governance, and focus of the Community Benefit Fund will be shaped through

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		significant reduction they have brought about in the value of our life savings. I invite IGP to participate in an exercise to evaluate this and to compensate us for our loss or to purchase our house for its value prior to the bombshell announcement of Lime Down. More generally, IGP should publish figures (a) for the amount of profit which Lime Down is expected to generate for their 'investors' and the participating landowners and (b) how much they propose to spend on 'community benefits' so that we can evaluate the genuineness of their 'altruism'. The "Information boards, nature trails and permissive paths" suggested as examples of countervailing benefits are laughably inadequate crumbs from the rich man's table. Considering the devastation which Lime Down will bring to the lives of thousands of local residents and the devaluation of most people's principal asset, their house, this is a staggeringly, insultingly, insensitive modern example of Marie Antionette's "Let them eat cake."		ongoing consultation, with input welcomed from local communities on how best to deliver value. With respect to Scheme returns and community benefit, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_452	Consultation and engagement	Good evening I have just completed your online feedback form. Please could you email or post me a copy of it. Email: [REDACTED]@arbigland.com Post: [REDACTED], House on the Shore, Kirkbean, Dumfries DG2 8BQ With many thanks [REDACTED]	No	The Applicant provided a copy of this stakeholders response issued to them via email as requested on 20/03/25.
LD2_CLE_418	Project description and DCO process	I am struggling to know how to begin this letter without just sitting in a tearful heap. The past year has been one of the most mentally and emotionally exhausting periods of my life. It feels as though we are engaged in a daily battle—a fight to protect our beautiful countryside from a foreign investor whose motives are clearly financial. No matter how you frame this project as a means to power homes with clean energy, we all know this area was chosen not for its suitability, but because a few landowners saw an opportunity for profit. What makes this situation so disheartening is that, had this been a community-led	No	The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant recognises that both landowners and the local community are key stakeholders. While landowners will receive a lease income, as in normal in any commercial lease agreements, the Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		initiative—a small-scale solar farm providing affordable energy to local villages, perhaps even with the imagined sheep you so prominently feature in your literature—it might have got support. Instead, the knowledge that profits will flow to IGP and Macquarie makes my stomach curdle. While I understand that those working for IGP are simply doing their jobs, I urge you to consider working for an employer with higher moral and ethical standards. You are worth more and I'm sure if the shoe was on the other foot, you would agree. These are some of the reasons I feel so strongly that this is wrong.		offsite community benefit initiatives, which will be developed in consultation with local representatives. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout. The Environmental Statement (ES) [EN010168/APP/6.1], Statement of Need [EN010168/APP/7.1], and Planning Statement [EN010168/APP/7.2] provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of renewable energy, and the other benefits associated with the Scheme.
LD2_CLE_418	Site selection and alternatives	Loss of Open Countryside and Inappropriate Location - It feels deeply wrong to sacrifice open countryside for this development. Solar farms should be situated on brownfield sites, industrial land, rooftops, or near	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		motorways—not on productive agricultural land. Have you fully explored alternatives? If preserving the countryside is truly a priority, this should be an obvious path. If, however, this is solely about financial gain, then I assume you will continue down this course, regardless of the consequences.		The Site Selection Assessment Report explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				As part of the assessment, the Applicant has also considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at PEIR as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19].
LD2_CLE_418	Socioeconomics, tourism, recreation and health	Mental and Emotional Toll The mental strain this project has placed on our family has been immense. The way IGP handled the initial rollout of maps in March 2024—placing our home squarely in the middle of your plans without so much as a knock on the door to inform us—was cruel. We learned of it from a neighbour, a few days before receiving your materials. This almost had a devastating impact on us. I	Yes	The Applicant has acknowledged the specific scenario for Fosse Farm and has amended the Scheme accordingly to ensure no permanent onsite infrastructure is to be located in the fields to the north, west, or south of the property. The Applicant has also moved the proposed temporary construction compound in field B1 as far north as possible to increase the separation distance between it and Fosse Farm.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		implore you not to repeat this “mistake” (your words) in future proposals. We are utterly exhausted and horrified by what the future may hold. The toll on human health is already significant, even before construction has begun. The anxiety and worry are overwhelming. The thought of living alongside an industrial development is devastating. Our life savings are tied up in our homes, and as of 12 March 2024, their value has been drastically reduced through no fault of our own. It is deeply insulting to be called NIMBYs and questioned why we have a right to be concerned about our house values. Why shouldn't we be devastated by this? Usually with NSIPS (like HS2) a legally binding compensation scheme is be established for affected residents. No such thing for any of us affected by LDS. It has been so sad that this project has caused such division in our community - we love living here, not only because of its unspoilt and natural beauty but also because of the sense of community. [REDACTED] family have been here since he was 5 and my family moved to Sherston when I was 10		The Applicant has assessed in Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] the likely impact of the Scheme's construction, operation, and decommissioning on mental health and wellbeing, in respect of physical changes to the surrounding environment, and in respect of community culture and identity as a result of changes to the agricultural aspect and character of the landscape. The chapter concludes that no residual significant effects from the Scheme on human health (including mental health) are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. The Applicant has not assessed the direct impacts of the Development Consent Order (DCO) process, but has sought to ensure that the community consultation process is as clear and accessible as possible to limit ongoing community anxieties about emergent Schemedetails. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised

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		and so it has been home to us for most our lives.		Through Consultation [EN010168/APP/6.3] , the Applicant has explored ways to ensure members of impacted communities have access to mental health resources during and following the DCO process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team.
LD2_CLE_418	Soils and agriculture	Impact on Agriculture and Food Security The Cotswolds are renowned for their beauty, quintessential English villages, and unspoiled landscapes. The land here, while not all Grade 1 or 2, has been farmed successfully for generations. It is heartbreaking to see tenant farmers placed on annual contracts, risking their livelihoods and too fearful to speak out. Using this land, including 30% BMV land, for solar panels undermines our food security at a time when resilience is critical. The UK already imports 46% of its food, and losing productive farmland will only exacerbate this reliance.	No	Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				<i>Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Further assessment of food security and soil quality can be found in Environmental Statement (ES) Chapter 16: Socio Economic, Tourism and Recreation and Chapter 17: Soils and Agriculture [EN010168/APP/6.1].
LD2_CLE_418	Transport and access / Noise and vibration	Construction Chaos and Safety Concerns The construction phase fills me with dread. The noise from drilling, which even your consultants have described as “ghastly,” will	No	A hierarchy of mitigation measures is contained in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] to ensure that significant noise effects do not occur

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		be unbearable. The additional traffic—over 20,000 articulated lorries, HGVs, and vans—will bring chaos to our narrow lanes and be so dangerous for anyone cycling or riding. How will you ensure drivers adhere to designated routes, avoid speeding, and refrain from taking shortcuts? The ancient verges and hedgerows will likely need to be cut back, further damaging the environment in the name of “saving the planet.” I am also deeply concerned about the potential for accidents during construction, which could tragically result in loss of life. Our local GP surgeries and hospitals are already stretched and will struggle to cope with the additional 500 workers who may need medical care. Furthermore, a solar farm supporter warned me that household theft often rises during such projects due to the influx of workers. What measures will you take to ensure the safety and security of local residents? SOC-1		due to potential night-time works, including locating trenchless cable installation greater than 80 m of sensitive receptors, using quieter equipment where practicable, and the use of acoustic fencing. As detailed in Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], no significant noise and vibration effects are anticipated at sensitive receptors as a result of trenchless cable installation methods. Proposed construction vehicle routes are set out in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [E N010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the DCO. The aim of the CTMP is to

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				ensure that the effect of the construction phase on the local highway network is minimised, including undertaking a road condition/dilapidation survey to identify and rectify any damage caused through the construction of the Scheme. Outside of the identified construction vehicle routes, there will not be transport and access effects. The CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.
LD2_CLE_418	Climate change and energy need	Environmental and Carbon Concerns The carbon footprint of this project is staggering. Thousands of panels will need to be manufactured in China, transported, installed, replaced, and eventually recycled. Have you calculated the total carbon emissions involved? While the UK appears to be pursuing green initiatives, this project risks being labeled as greenwashing, especially as it shifts production to countries like China, where coal-fired power plants are still being built weekly to meet energy	No	The Applicant recognizes the concerns regarding the supply chain for solar panels, particularly the issues of modern slavery and human rights violations. As outlined in Environmental Statement (ES) Chapter 7: Climate Change [EN010168/APP/6.1], solar panels and BESS units are likely to be sourced from China or countries of similar distance from the UK. However, we are committed to ethical sourcing and are active supporters of the Solar Stewardship Initiative (SSI), a solar-specific supply chain assurance

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		demands. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]		scheme. The SSI has established a comprehensive environmental, social, and governance standard aimed at promoting a responsible, transparent, and sustainable value chain. To uphold these principles, we will prioritize using PV modules from manufacturers that adhere to the SSI Standards, ensuring that our supply chain is free from forced labour and other unethical practices. Further details on the ethical sourcing of panels can be found in Development Consent Order (DCO) Volume 7: Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20].
LD2_CLE_418	Hydrology, flood risk and drainage	Flood risk and soil contamination Have you seen how severely the roads flood during the winter months? The runoff from the solar panels will only exacerbate this problem, increasing the risk of flooding for nearby villages and homes. Additionally, many of us, including us at Fosse Farm, and our tenant in Swallow Cottage, rely on boreholes for our drinking water. If the solar panels are damaged or, worse, if there is a battery fire, the resulting toxic waste could seep into the soil and aquifer, contaminating	No	The potential for the Scheme to increase flood risk has been assessed in detail within the FRA and Drainage Strategy (Environmental Statement (ES) Volume 3, Appendix 11-1: Flood Risk and Drainage Strategy [EN010168/APP/6.3]), which considers both baseline conditions and the effects of the Scheme. The Scheme has been designed to ensure that greenfield runoff rates are not exceeded, with drainage controls proposed for built infrastructure such as the BESS, substation compounds, and access tracks. The majority of the site,

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		our water supplies. The potential harm to our health and environment is unimaginable.		including all panelled areas, will remain as permeable vegetated land. Panelled areas are not served by formal drainage systems and are expected to continue supporting natural infiltration. Given the low pollutant load and cessation of agrichemical use, runoff quality is expected to improve compared to the existing baseline. This approach is consistent with national best practice and published research on solar development. The FRA confirms that the Scheme will not increase flood risk either on-site or downstream. In terms of potential groundwater contamination, the BESS and associated compounds will be constructed on lined, impermeable surfaces with gravel subbases and a shut-off valve system at the outfall. In the unlikely event of a fire or spill, these features will contain potentially contaminated runoff within the compound. Water would then be tested and either removed from site or treated appropriately. These measures are designed to avoid infiltration to ground or discharge to local watercourses.

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				An Outline BSMP has been submitted alongside the Development Consent Order (DCO) application. Local firewater provision is also incorporated within the BESS compound, consistent with NFCC guidance. These provisions are intended to ensure any incident is contained and managed effectively. With these embedded mitigation measures in place, the ES concludes that the Scheme will not result in significant adverse effects on flood risk or groundwater quality.
LD2_CLE_418	Other Environmental Matters (Battery Safety)	Battery Energy Storage System (BESS) Risks I am seriously alarmed by the catastrophic risk a fire in the BESS could pose to wildlife, residents, and the environment. Our home is just 1,220 meters away, and many houses in Hill Hayes Lane and Norton are even closer. The constant anxiety of living near a facility with such potentially toxic consequences is overwhelming. Telling us that such incidents are “unlikely” or “rare” offers no comfort. We have seen the devastating effects of lithium battery fires elsewhere and know the risk is far from inconceivable.	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Storage Safety Management Plan (OBSSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority • To minimise the consequences should an event occur • To restrict any event to the BESS site and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities,

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				workplaces, transport links, etc.) To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.
LD2_CLE_418	Decommissioning and construction	Decommissioning and Accountability I am deeply concerned about who will be responsible for cleaning up this mess. Will it simply be flipped to a pension fund, leaving accountability unclear? Who will guarantee the cleanup, recycling, and proper disposal of materials—and how much will end up in landfills? What will happen to the land after 60 years? Can you provide assurances that it will be restored to viable farmland, and how will you enforce this?	No	Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement. Wiltshire Council, as the local planning authority, would be responsible for enforcing the conditions of the consent. Decommissioning liabilities will be taken into account as part of the Scheme financing process. Failure to comply with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_418	Consultation and engagement	Flawed Consultation Process The consultation process has been flawed. You have yet to identify the cable route, substations, and inverters, making it impossible for residents to fully understand the impact on their lives. The potential for light, sound, and noise pollution is a huge concern. The peace and tranquility we currently enjoy—walking through the countryside, listening to birdsong, watching the deer leap over the fields —will be shattered by the hum and buzz of industrial infrastructure. I have yet to see a noise survey, making it difficult to provide informed feedback. All your literature has pretty pictures of countryside and sheep without showing the true height or size of the infrastructure - you seem to be trying to downplay the project's negative effects which means you have not been honest and transparent.	No	The Preliminary Environmental Information Report (PEIR) presented at Statutory Consultation is intended to provide a preliminary assessment of the environmental effects of the proposed scheme. The Development Consent Order (DCO) process is designed to be iterative, with multiple phases such as the PEIR and the Environmental Statement (ES). This phased approach allows statutory stakeholders and the local community to review and engage with the Scheme at various stages, ensuring their feedback is incorporated into the design. The refined Cable Corridor Route was not included at PEIR stage so that the views of the public could be incorporated into the refined corridor illustrated in the Environmental Statement (ES). It is noted that some surveys took place after Statutory Consultation however, the Applicant confirms all relevant surveys have been completed and the results presented in the relevant ES chapter, for example ES Chapter 14: Noise and Vibration [EN010168/APP/6.1]. Community consultation literature included

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				clear references and signposts to the PEIR for more detailed, technical information regarding the Scheme The Project Information Booklet spoke to the height and size for panels and other key infrastructure as was being assessed in the PEIR.
LD2_CLE_418	Socioeconomics, tourism, recreation and health	Tourism and Visual Impact Tourism is a vital part of our local economy, supporting many businesses and livelihoods. Cyclists come every weekend up the Fosseway and towards Sherston - stopping for a coffee at The Angel, or The Courtyard Cafe. They have said that they would avoid coming if this goes ahead as cycling past miles of solar panels is not appealing at all. To be honest there are many more reasons but I'm too tired to think and should have emailed before the deadline. I beg you to reconsider this project. The harm it will cause to our community, environment, and mental well-being far outweighs any potential benefits. I can not imagine if you've visited the area, that you actually think it's a good idea and wouldn't be equally horrified if you lived in the village.	No	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability individual PROW, tourism destinations such as the Fosse Way and Cotswold National landscape, and the economic impact to the tourism economy has been included in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations and events, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. The Applicant has assessed in ES Volume

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		If you are truly committed to clean energy, please explore alternatives that do not sacrifice our countryside, livelihoods, and peace of mind. Please acknowledge my letter and respond to any questions I have raised.		1, Chapter 18: Human Health [EN010168/APP/6.1] the likely impact of the Scheme's construction, operation, and decommissioning on mental health and wellbeing, in respect of physical changes to the surrounding environment, and in respect of community culture and identity as a result of changes to the agricultural aspect and character of the landscape. The chapter concludes that no residual significant effects from the Scheme on human health (including mental health) are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. The Applicant has not assessed the direct impacts of the DCO process, but has sought to ensure that the community consultation process is as clear and accessible as possible to limit ongoing community anxieties about emergent project details. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has explored ways to ensure members of impacted communities have access to

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				mental health resources during and following the DCO process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team.
LD2_FFD_212	Project description and DCO process	[Response to digi feedback form] Q4 [overall comments] - The location has a too long cable route and roof top solar isn't fully exploited yet Q5 [comments on indicative masterplan] - Wrong loaction Q6 [comments on design principles] - In your presentation you say the land will be restored at the end of life. Your presenter say "as far as practical" Q7 [comments on the assessment of potential effects / Landscape] - Clearly is will be transformational to the fosse way, sadly Q8 [comments on the assessment of potential effects / Ecology] - From recent experience on a pipeline installation, the	No	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. High voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		representations in the regard these impacts aren't true! Q9 [comments on the assessment of potential effects / Environment] - Put it in Melksham. The cable route is 3 times as big as the scheme! Q10 [comments on the Cable Route Search Corridor] - It's too far with a massive land take. Restoration just doesn't work from real life examples Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Your own presenter recognised that restoration can only be done as "far as practical". Not what the presentation says Q12 [suggestions for on-site community benefits] - Clearly there aren't any community benefits. Move it nearer to melksham reduces impact massively Q13 [suggestions for off-site community benefits] - Move it! Q14 [Additional comments] - We all know		properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the ES [EN010168/APP/6.1] detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that "Solar energy

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		that Ed Milliband doesn't really care if this is supported or rejected by the Planning Inspectorate. We have farmed this area for over 100 years, protecting the land. All this is going to be bulldozed for a green agenda, that seems to be a uk only agenda We have solar, on the farm, but we aren't allowed to cover our roofs with solar due to DNO restrictions. In my other roles, we have millions of sq ft of roofs not covered in solar. Why not encourage roof useage first In summary 1/ use roofs first 2/ avoid the long cable routes 3/ don't pretend this won't be a local eyesore 4/ don't pretend the consultation matters 5/ better training for your presenters, they just sound bored!		is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy" (p15). The Roadmap talks to the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because "Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale" and "Speed of deployment is also a huge benefit of solar" for both ground mounted and rooftop schemes (p15). This "makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets." The Roadmap includes illustrative deployment scenarios which "show that reaching the Clean Power 2030 range is achievable, but will require significant action" (p16). Large-scale solar represents 60-65% of the UK's installed solar capacity by 2030 in the Roadmap's illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range

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				through the illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in deployment of these schemes must be made up for by other technologies, including from large scale schemes. These publications make it clear, and the Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme. National Policy Statement EN-3 Paras 2.10.24 & 2.10.25 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to

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				be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPPs. This point is expanded upon in the Statement of Need [EN010168/APP/7.1] in particular in Section 4.3. Chapter 8 of the Statement of Need provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme

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LD2_FFD_228	Landscape and visual / Ecology and biodiversity / Hydrology, flood risk and drainage / Transport and access / Project description and DCO process	Q4 [overall comments] - The project is ill-considered and entirely without merit. It will reward foreign asset-stripping company and investors and ruin the landscape and agriculture locally. It will also hugely inconvenience local roads, countryside, AONBs and general environment. Wiltshire already has more than it's share of solar sites and this is too big and will overload the county. It is also too far from the Melksham base to which it needs connecting. Q5 [comments on indicative masterplan] - The location is an area of outstanding natural beauty and will be scarred for generations. Site access will lead to the ruination of roadside edges, hedges and ditches and disturb local wildlife and peaceful enjoyment of our surroundings Q6 [comments on design principles] - There will be no biodiversity gain. This claim is palpably untrue and misleading. The only gains will be in the pockets of the shareholders in a foreign company and a few unscrupulous private investors. Q7 [comments on the assessment of potential effects / Landscape] - The height of the panels makes them visible from a long	No	The Scheme is located outside of the Cotswold National Landscape. However, it has been agreed that parts of Site A, B and C are within the setting of the Cotswolds National Landscape where panels have been set back by one field. Panels on the edge of the Cotswolds National Landscape have been removed from the scheme following the PEIR submission. These fields are proposed for positive enhancement. Refer to Environmental Statement (ES) Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] Q6 Regarding the point on Biodiversity Net Gain (BNG), a BNG Assessment and completed DEFRA Metric has been submitted with the DCO application in DCO Volume 7 Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [EN010168/APP/7.9]. This is a quantitative method of demonstrating the scheme will deliver net gain for biodiversity. Q7 The landscape and visual impact of the Scheme is fully assessed in the the

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		distance away, thus scarring the views and enjoyment of the landscape. The existing vegetation will be badly damaged and previous experience suggests that there will be huge problems at the end of the contract with clearance and restitution. Q8 [comments on the assessment of potential effects / Ecology] - The assurances on flooding are unbelievable and real evidence suggests significant danger due to run off and compaction. The ecological and biodiversity assurances are being challenged in the Stop Lime Down campaign. Q9 [comments on the assessment of potential effects / Environment] - The company for obvious reasons of self interest, is grossly understating the potential damage to the ecology, landscape, agricultural and residents' interests. Buying off a few farmers with surplus cash from subsidies verges on the immoral. Q10 [comments on the Cable Route Search Corridor] - The disruption during the installation of the cables will be massive and unbearable for residents and is totally impracticable. The pressure on local lanes		LVIA -ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.

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		will be huge and totally disruptive of country living. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - The plans are appalling to all who live in the area and will create intolerable pressure on roads, - environment and ecology. Mitigation measures are laughable when compared to the levels of disruption and destruction. Q12 [suggestions for on-site community benefits] - This is mere lip-service to local needs. Will you compensate residents for the provable loss of value on property prices?? Research has shown a dramatic effect on such in other locations which your plans deny. Q13 [suggestions for off-site community benefits] - This is a red herring to the key issues and can be seen as an attempt to bribe local residents with specious promises of community benefit. We don't need these. Just do not progress the project. Q14 [Additional comments] - The whole edifice of net zero is crumbling as we speak.		Q8 - ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] confirms that no significant effects are predicted on flood risk as a result of the Scheme. Furthermore, measures to prevent compaction and associated flood risk are presented in the Outline Soil Resources Management Plan [EN010168/APP/7.15]. The Applicant acknowledges that there will be concerns from the local community regarding various environmental matters. The EIA process is designed to provide a thorough assessment of all potentially significant environmental effects caused by the Scheme. Whilst all practicable measures are taken to avoid impacts and implement adequate mitigation it is recognised that it is not always possible to mitigate all significant effects. A summary of the significant effects remaining post mitigation (residual effects) have been reported on in Chapter 22: Summary of Residual Effects [EN010168/APP/6.1]. Whilst the Applicant acknowledges that there will be some potentially significant effects as a result of the Scheme, it is

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		There is no fundamental justification for Lime Down.		deemed that the community benefits, enhancement opportunities and need for more renewable generation capacity in the UK outweigh the adverse effects. More information on need for the Scheme can be found in ES Volume 1 Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1] and DCO Volume 7, Statement of Need [EN010168/APP/7.1]. The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme been fully assessed within the ES. Existing solar farms are considered in the baseline of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]). Forthcoming solar developments are assessed within the cumulative and in-combination effects section of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]) and summarised in ES Volume 1, Chapter 21: Cumulative and In-combination effects.
LD2_FFD_249	Other Environmental Matters (Battery Safety) / Landscape	Q4 [overall comments] - I will send a more detailed list at a separate point. I am against the solar project as a whole since there are other ways of collecting natural energy that are far more efficient and less damaging to the landscape. I	Yes	Q4. The Statement of Need [EN010168/APP/7.1] sets out the compelling case for the scheme and the benefits it brings to the delivery of a low carbon, secure and affordable British electricity system. Flexibility is needed to

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	and visual / Noise and vibration / Soils and agriculture / Project description and DCO process	specifically question the need for and safety of battery storage which seems to be about selling back to the grid at times of higher charges i.e making money. Very thankful that this kind of toxic timebomb is no longer to be sited 85m from my house. I am also against the sheer scale of the project, which is far larger than required, means some villages will be surrounded by huge solar panels. Wiltshire already has more than its fair share of solar schemes currently, planned and being built right now. Q5 [comments on indicative masterplan] - N/A Q6 [comments on design principles] - N/A Q7 [comments on the assessment of potential effects / Landscape] - No amount of hedging and vegetation is going to be able to adequately screen those size of solar panels. This will be visible for miles around, and will turn a beautiful area of green countryside into a massive sea of mirrored panels. People will look back in 20yrs time and say we have ruined the countryside Q8 [comments on the assessment of		match supply with demand at all times. Section 3.9 of the Statement of Need explains government's view that "It is crucial we complement renewables with flexible capacity to ensure we can deliver clean power no matter the weather". The battery storage system proposed as associated development to the scheme provides such flexibility services. The need for new low carbon generation capacity (including large-scale solar capacity) is urgent and unprecedented to slow climate change (Statement of Need, Section 3.6). However, the availability of locations which are appropriate for large-scale solar schemes are limited. Therefore the Applicant has proposed a Scheme which delivers the greatest possible decarbonisation and energy security benefits from the land and grid connection available to it. Q7/8 - The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. A Biodiversity Net Gain Assessment and completed DEFRA Metric has been submitted with the DCO

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		potential effects / Ecology] - Again, no amount of new planting is going to replace the wildlife habitat that will be lost. I question the possibility that there could ever be a gain Q9 [comments on the assessment of potential effects / Environment] - As a community we are all terrified of the safety of battery storage units and what would happen in the event of a fire. I don't think this aspect has been adequately addressed at all. Q10 [comments on the Cable Route Search Corridor] - As a homeowner who has been continually getting correspondence regarding cable routes, and knowing some of my neighbours are being threatened with legal action if they do not allow the cable route through their properties - I obviously have strong feelings about this. The proposed work area of the cables is huge. 50m work area for a 5x2 trench? It needs to be kept well away from domestic properties, trees, watercourses, and areas of special wildlife. I worry about the noise and vibrations that will be felt when it inevitable comes behind my house. I worry moving the soil will affect the flooding issues. I worry about the wildlife		application in DCO Volume 7 Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [EN010168/APP/7.9], both of which demonstrate how the Scheme will deliver a quantifiable net gain for biodiversity. The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities, workplaces, transport links, etc.); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		also. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Regarding the solar fields, I believe they may be successfully returned to some form of agricultural use Ple- but with regards to the battery site, I question if decommissioning could ever really be achieved. Covering such a large area in concrete can't really be undone easily. Q12 [suggestions for on-site community benefits] - Give local people cheaper rates on their electricity bills, and maybe recompense homeowners for the lost values in their property prices. Q13 [suggestions for off-site community benefits] - N/A Q14 [Additional comments] -N/A		responders, and the local community. The Applicant refers to Chapter 3:The Scheme of the PEIR which outlines the indicative working width for installing the cables is anticipated to be 25m to allow for necessary spatial flexibility in the routing of cables, save for instances where it is necessary to have a wider working width to cross existing utilities or a narrower working width to avoid environmentally sensitive features like hedgerows. The working width includes the cable trench, soil, and spoil storage, working area and haul road with passing places where required. The Applicant notes the concerns raised regarding the long-term restoration of the battery energy storage site, particularly in relation to areas where concrete may be used. While it is acknowledged that certain areas may require longer recovery periods, all infrastructure will be fully decommissioned at the end of the scheme's operational life in line with a detailed Decommissioning and Restoration Plan secured through the DCO. As stated in ES Volume 1, Chapter 17: Soils and Agriculture

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				[EN010168/APP/6.1] all land will be returned to its original use and condition as far as is practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids, or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need the excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. A Decommissioning Strategy is secured by Requirement 21 of the Development Consent Order (DCO) and will need to be approved by the local planning authority

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				prior to decommissioning. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and be applied in conjunction with the SRMP in order to promote successful reinstatement. An Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] has been submitted as part of the Development Consent Order (DCO) Application.
LD2_FFD_279	Landscape and visual / Ecology and biodiversity / Socioeconomics, tourism, recreation and health / Climate change and energy need / Transport and access / Project description and DCO process	Q4 [overall comments] - I feel very strongly that the construction and siting of all things necessary for this project will be hugely detrimental to the environment, the landscape, wildlife and to peoples' wellbeing. The damage caused to the whole area involved and to local residents will be irreversible. Q5 [comments on indicative masterplan] - Your proposed planting, ecological mitigation and enhancement will not in any way compensate for the damage you will cause. The loss of open countryside, replaced with acres of solar panels up to 4.5 metres high, with tall mesh security fencing, security cameras, inverter cabins,	No	The Applicant acknowledges that there will be concerns from the local community regarding various environmental matters. The Environmental Impact Assessment (EIA) process is designed to provide a thorough assessment of all potentially significant environmental effects caused by the Scheme. Whilst all practicable measures are taken to avoid impacts and implement adequate mitigation it is recognised that it is not always possible to mitigate all significant effects. A summary of the significant effects remaining post mitigation (residual effects) have been reported on in Environmental Statement

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		substations, batteries and lighting cannot be disguised by your proposals or provide damage limitation. These panels will be made in China and transported to the UK at what cost to the environment? In your quest for more eco friendly electricity you will be causing more damage to the environment and people than can possibly be generated from your project. Q6 [comments on design principles] -The scale of this project is completely wrong for your intended sites. This whole Project will have a huge impact on residents mental health by having to be forced to live near an ugly industrial development when they have chosen to live in the countryside. The loss of agricultural land will have an effect on our food security. Flooding in certain areas will also be a problem. Noise generated by the substations and battery stores will again affect peoples' mental health. The number of HGV vehicles travelling on country roads will be intolerable both from a safety and noise point of view. Q7 [comments on the assessment of potential effects / Landscape] - Your assessment falls well short of the actual damage to the landscape and your		(ES) Volume 1 Chapter 22: Summary of Residual Effects [EN010168/APP/6.1]. Potential impacts of the Scheme are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. This assessment considers all phases of the Scheme, including the construction phase, and describes appropriate measures to avoid or mitigate identified impacts. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of determinants of health, with mental health aspects to them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. In consultation with Wiltshire Council's Public Health Team, as documented in ES

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		measures are completely inadequate. Q8 [comments on the assessment of potential effects / Ecology] - Irreparable damage will be done to the ecology and biodiversity and your mitigation measures are completely inadequate. Q9 [comments on the assessment of potential effects / Environment] - As stated above your Project will cause irreparable damage to the environment. The measures you are proposing are completely inadequate. Q10 [comments on the Cable Route Search Corridor] - Also the proposed site is too far from the storage facility in Melksham, resulting in massive disturbance and inconvenience to all living and operating businesses in the area. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Life will be intolerable during the construction and maintenance of the site and nothing you can do will compensate sufficiently for this.		Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has explored ways to ensure members of impacted communities have access to mental health resources during and following the Development Consent Order (DCO) process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team. Whilst the Applicant acknowledges that there will be some potentially significant effects as a result of the Scheme, it is deemed that the community benefits, enhancement opportunities and need for more renewable generation capacity in the UK outweigh the adverse effects. More information on need for the Scheme can be found in ES Volume 1 Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1] and DCO Volume 7, Statement of Need [EN010168/APP/7.1]. The landscape and visual impact of the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q12 [suggestions for on-site community benefits] - This is completely irrelevant and merely an attempt to 'buy off' local residents. Q13 [suggestions for off-site community benefits] - See above Q14 [Additional comments] -Wiltshire already has more than it's fair share of solar parks and your Project is completely excessive in size, disruption and cost. Solar panels should be located on the roofs of warehouses and industrial sites.		Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .The LVIA has been prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3).
LD2_FFD_287	Project description and DCO process / Ecology and biodiversity / Decommissioning and construction	Q4 [overall comments] - wrong size, wrong site, wrong ownership Q5 [comments on indicative masterplan] - the sprawling nature of the ill-planned scheme means that so much countryside is impacted as well as residents and the wider population who visit this area in their 100,000s Q6 [comments on design principles] -you have not provided adequate design detail it is an insult Q7 [comments on the assessment of potential effects / Landscape] - after talking	No	The Applicant acknowledges that there will be concerns from the local community regarding various environmental matters. The purpose of Preliminary Environmental Information Report (PEIR) is to provide a preliminary assessment of the environmental effects of the proposed scheme. As such finalised assessments are not provided at PEIR to allow the Applicant time to take on the feedback received at Statutory Consultation and work this into the design envelope to be submitted in the DCO application. The finalised assessments are now

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		to your team at the consultations i have absolutely zero trust in your attitude to the landscape and views your mitigating plans were pathetic and inconsistently explained. Q8 [comments on the assessment of potential effects / Ecology] - Again, i was wholly unimpressed with the manner in which you tried to pretend you were bothered about the ancient ecology and extremely wide biodiversity in this area no faith in your claims of having a proper plan to protect the Natural World so evident in the site Q9 [comments on the assessment of potential effects / Environment] - your lack of proper understanding of so many aspects - in particular the flooding risk and unstable nature of the soil in this area left me feeling so depressed. Q10 [comments on the Cable Route Search Corridor] - much much too far from the grid what are you thinking??? brown envelopes I am thinking Q11 [comments on the assessment of potential effects during construction /		available within the Environmental Statement [EN010168/APP/6.1]. The Applicant is confident that the assessments provided in the ES [EN010168/APP/6.1] are thorough and have properly considered all impacts to the environment. Detailed design is not available at Development Consent Order (DCO) submission stage because the DCO process typically occurs at an early phase of scheme development. At this stage, the focus is on obtaining consent for the overall concept (often referred to as a 'design envelope') and framework of the Scheme. rather than the fine details. This approach allows for flexibility in addressing unforeseen issues that may arise as the design evolves post-consent. Additionally, certain regulatory requirements, such as safety standards for infrastructure, may necessitate changes to the design after the DCO has been granted. The ES [EN010168/APP/6.1] provides a 'worst-case' assessment of the design which could ultimately be taken forward.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		operation / decommissioning] - 2 years of hell i envisage during the construction i would love to move but our house will be worthless no options available to so many residents how are you planning on dealing with that? Q12 [suggestions for on-site community benefits] - i dont trust your 'benefit' schemes there can be no trade off for the destruction you are planning Q13 [suggestions for off-site community benefits] - dont try and bribe the community that is on its knees trying to see sense when confronted by this scandalous scheme Q14 [Additional comments] -you should be ashamed of yourselves trying to green-wash into thinking this is about climate change it is about you making loads of money and innocent countryfolk suffering		
LD2_FFD_288	Project description and DCO process / Climate change and energy need	Q4 [overall comments] - I oppose the project as it is not in the 25% of the planned project that we only need to fulfil the govt energy targets given its impact on food security,farming,community,biodiversity and landscape compared to other projects	No	Comment noted. Regarding the decommissioning concerns, decommissioning liabilities will be taken into account as part of the Scheme inancing process. Failure to comply with the requirements of a Development

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q5 [comments on indicative masterplan] - We do not need any projects this large(it would be the biggest in Europe) given the over subscription to NESO of projects(4 times the amount of power actually needed Q6 [comments on design principles] - N/A Q7 [comments on the assessment of potential effects / Landscape] - The impact on landscape is far worse than many other projects Q8 [comments on the assessment of potential effects / Ecology] - The impact is far worse than many other projects Q9 [comments on the assessment of potential effects / Environment] - N/A Q10 [comments on the Cable Route Search Corridor] - The impact and disruption to bio diversity is really bad Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - There is no plan to de commision the project. What happens to all the panels, currently they end		Consent Order (DCO) is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Regarding the NESO connections queue, the Applicant has submitted a Statement of Need [EN010168/APP/7.1] to address these and related comments as part of its application. The ongoing Connections Reform process is seeking to rationalise th connections queue, while the Clean Power 2030 Action Plan seeks to prioritise support for those schemes which are more ready to proceed, such as this Scheme. The Statement of Need [EN010168/APP/7.1] sets out government's current pathway to achieving a decarbonised grid, noting that it is government's view that electricity supply in 2050 is expected largely to comprise of wind and solar generation.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		up in landfill Q12 [suggestions for on-site community benefits] - There are no benefits to the community, only damage Q13 [suggestions for off-site community benefits] - This is green washing Q14 [Additional comments] - There are approximately 221 projects in the queue for NESO approval which, if all approved would provide 4 times the 2035 govt target of 29GW. This situation would get worse later as the 2050 govt target is only 36GW. This is from all renewables, not just solar. This is in direct contradiction to your website statement that the govt 2030 target is 50GW so there is clearly an issue with your presentation of information to the public. Therefore, how can any of your claims be trusted? Given the country does not need the volume of power planned, only the 25% of projects that cause least damage and disruption to food security, farming, communities, landscape and biodiversity should be approved. This issue is about energy security for the country weighed against the other factors outlined above and		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		not relative profitability for any individual project so that should not be a criterion used. Compared to other projects yours fails to make the list on several points: 1) Damage to community 2) Loss of prime agricultural land (Govt grades 1 to 3a) and food security 3) Loss of landscape 4) Negative impact on biodiversity Further points in opposition to your project are: 1) Your project would be the biggest in Europe, so given we are massively oversubscribed with potential projects we do not need any to be this large 2) Both on and offshore wind are less damaging to our land environment overall 3) Wiltshire is already over impacted by solar farms compared to other areas In conclusion I state that I am completely opposed to this project for the reasons detailed above		
LD2_FFD_319	Landscape and visual	Q4 [overall comments] - I am concerned about the proximity of the proposals to the AONB. I believe the size of these proposals will harm the visual landscape and ruin the walks through the PROW. There are more	No	Comment noted. A full assessment of Landscape and Visual effects is available in Environmental Statement (ES) Chapter 8: Landscape and Visual [EN010168/APP/6.1] .

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		suitable options for this proposal but not in this tranquil location.		
LD2_FFD_323	Site selection and alternatives	Q4 [overall comments] - I am very disappointed that you are using old technology. The uk has many roofs on which panels should be placed. What will happen to the production of food? The damage to the local tourism industry. Noise. Traffic. Listed buildings and properties. -	No	As part of the site selection assessment, the Applicant has considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites. Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that "Solar energy

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				is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy” (p15). The Roadmap talks to the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because “Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale” and “Speed of deployment is also a huge benefit of solar” for both ground mounted and rooftop schemes (p15). This “makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets.” The Roadmap includes illustrative deployment scenarios which “show that reaching the Clean Power 2030 range is achievable, but will require significant action” (p16). Large-scale solar represents 60-65% of the UK’s installed solar capacity by 2030 in the Roadmap’s illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range

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				through the illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in deployment of these schemes must be made up for by other technologies, including from large scale schemes. These publications make it clear, and the Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme. Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs</i>,

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				<i>Agricultural land use in England at 1 June 2024).</i> It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of nearby tourism destinations, and the economic impact to the tourism economy has been included in the Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. This assessment considers the impact on individual receptors such as visitor attractions be that practically in their use,

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				or their enjoyment and desirability, impacts on events, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. The assessment estimates a worst-case loss of 50 jobs in tourism-based industries. Compensation is only likely to be awarded to properties directly impacted by the Scheme, such as agricultural tenancies, and any land required for the construction of the Cable Route Corridor. The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant

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				effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in

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				Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.

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				ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] for embedded mitigation and Section 12.11 for additional mitigation). No direct impacts have been identified to listed buildings. Identified impacts to listed buildings would be indirect and related to elements of their setting that contribute to their significance.
LD2_FFD_364	Landscape and visual / Ecology and biodiversity / Hydrology, flood risk and	Q4 [overall comments] - This proposed scheme , which i object to , will have a devastating effect on the beautiful Cotswold Landscape which we are blessed to live in . Not only for us locals but visually for all the visitors to this area! The construction period,	No	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8:

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	drainage / Socioeconomics, tourism, recreation and health / Transport and access / Other Environmental Matters (Battery Safety) / Project description and DCO process	which will be lengthy , will have a hugely detrimental effect on the Ecology and biodiversity of any of the lands that it touches. The area is blessed with many trees and small woodlands , typical of the Cotswolds, some of the Ancient Oaks many hundreds of years old - an irreplaceable feature of this stunning landscape - why are we threatening them - these trees are the " lungs of the planet " ! During this last winter a portion of this proposed " solar " area was significantly flooded - no thought or reference has been given to the local Hydrology - what happens if these panels and B.E.S structures are partially submerged? During the proposed construction period your model shows a vast number of daily vehicle movements - the local village roads where i live - shown as your access routes for construction of area A and B - are just not suitable. The noise and vibration, generated by pile driving for the legs for each panel , will cause tremendous audio nuisance for any of us living in close proximity to the site over a long period. It seems no thought has been given to the Mental Health of those of us living next to this " solar Park ". I have seen and spoken to neighbours leaving your meetings in tears - what will it do to their house prices? What are the pollution risks to them and their		Landscape and Visual [EN010168/APP/6.1]. Potential impacts of the Scheme on habitats, protected species and species of conservation concern are assessed in ES Volume 1, Chapter 9:Ecology and Biodiversity [EN010168/APP/6.1] Regarding the concern around local flood events seemingly not being captured within the ES, flood risk assessments are based on long-term data from the Flood Estimation Handbook (FEH), which considers multiple years of rainfall data and catchment characteristics. This approach provides a reliable and consistent basis for understanding flood behaviour and informing appropriate mitigation, in line with Environment Agency and Lead Local Flood Authority guidance. Moreover as confirmed by ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] sensitive infrastructure such as substations and BESS compounds has been located outside of flood risk areas.

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		families? The Battery storage units are well known to be a considerable fire risk ? What happens if / when one of these catches alight? What happens if you live within the 6 mile evacuation zone ? My final point is food security - with all the recent turmoil in the world should we really be removing another 2000 acres plus of good farming land at this time - definitely not!		The key safety objectives of the indicative site design planning, Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that have been submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities, workplaces, transport links, etc.); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community. The Applicant acknowledges that construction and operational noise, as well as changes to visual aspect may have a mental health and wellbeing impact. As such, the likely significance of effects from the Scheme are assessed in in ES Chapter 18: Human Health [EN010168/APP/6.1]. The chapter concludes that no residual significant effects from the Scheme on human health

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				(including mental health) are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. Impacts on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES (see Consultation Report Appendix B: EIA Scoping [EN010168/APP/5.2]). This is because there is no empirical evidence that industrial scale solar farms cause significant adverse effects on property prices. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This will be a requirement of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been submitted with the DCO.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_364	Site selection and alternatives	Q5 [comments on indicative masterplan] - The Indicative Masterplan for this project is poorly researched, lacking in detail and fundamentally flawed! The basic fact that there is no available Grid Connection at the local [CHIPPENHAM] substation should ring alarm bells immediately ! Proposing to take the cable [s] 13 miles to Melksham underground is ludicrous. Carving a large swathe through the countryside to do so - not just the few metres where the cable is actually buried - but the 15 or so metres each side that is affected to provide the working area to undertake the task. And every so many miles using the local C roads to access the trenching areas - causing mess and disruption to many other local communities - some miles away from the development itself!	No	More information regarding selection of the cable route corridor is contained within Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. This includes details of the methodology adopted when selecting initial route options such as the desire to keep the route straight, buffers around residential properties, minimising impacts on designated areas, ancient woodland and local wildlife sites, and minimising crossings of utilities, transport infrastructure, hedgerows and watercourses. Regarding the distance from Melksham substation, more information regarding how the site was selected can be found in ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. Following discussions with National Grid, a grid connection was identified at Melksham which could provide capacity for a utility scale solar farm. The Applicant explored sites around Melksham which could provide sufficient land to utilise the grid

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				connection capacity that was available (and therefore provide maximum benefits in terms of meeting the country's renewable energy needs). The search area of 20km radius from Melksham Substation was established, which the Applicant considers to be a viable distance from the point of connection for a project of this scale. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been "scored" to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.
LD2_FFD_364	Landscape and visual / Socio-economics	Q6 [comments on design principles] - Claiming this project is landscape led is basically a joke! The sheer height of the proposed main panels will dominate the landscape in a horrific way . What thought has been given to the effect on local tourism - the many visitors that come to walk and cycle through this area, attracted here by the views and local flora and fauna. The construction route through Grittleton uses the C Roads which are part of the Wiltshire Cycleway - are cyclists really going to feel safe sharing these roads with all your daily vehicle movements? This C Road is part of the " Fosseway " - the ancient Roman Road - do we really want that jammed with construction traffic and mud and dirt in the winter months?	No	The Scheme has significantly reduced from the layout assessed at Preliminary Environmental Information Report (PEIR) in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the Environmental Statement (ES) [EN010168/APP/6.1] . The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) (Outline EPMS) [EN010168/APP/7.19]

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Applicant has assessed the likely significant effects on tourism and recreation in the areas surrounding the Scheme in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] . This includes an assessment of the likely effects on tourism and recreational use of features in the area in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3] , such as PRoWs including the Fosse Way and Wiltshire Cycleway, and the likely knock-on effect on the tourism and visitor economy as a result of reduced visitor spending.
LD2_FFD_364	Landscape and visual / Ecology and biodiversity	Q7 [comments on the assessment of potential effects / Landscape] - Your assessment of potential effects and the counter measures proposed cannot mitigate , in any way, the results of siting this " solar park " in this area. This is an historic landscape , with beautiful rolling countryside , and it is NOT THE PLACE FOR THIS PROJECT! There may be other , less sensitive sites, nearer the Grid Connection but that is not for me to point out!	No	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The Scheme provides significant opportunities for landscape recovery and biodiversity Net Gain. These mitigation and enhancement measures are shown in ES Volume 2: Landscape and Ecological

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q8 [comments on the assessment of potential effects / Ecology] - You have proposed some amounts of tree and hedgerow planting with species protection and habitat replacement - this does not , however, detract from the considerable harm that will be done when you " break ground " - this is akin in my eyes to " adding a few flower beds to the edge of a 5 acre supermarket car park " - after it has been cleared, created, tarmaced and all the white lines painted and street lights added!		Mitigation Plan (LEMP) [EN010168/APP/6.2] and are described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) (Outline EPMS) [EN010168/APP/7.19].
LD2_FFD_364	Transport and access	Q9 [comments on the assessment of potential effects / Environment] - Your project, if undertaken , will have a huge effect on the local environment. Are you using a local Rail Depot to bring in your equipment? NO. Are all the buses and cars transporting the workers to the build site electric? NO. Are the many HGV'S coming to site every day running on Green Energy ? NO. Are you proposing to use a local area to Marshall vehicles and then, with careful thought, lift share/ piggy back / rationalise the daily movements? Have you proposed a way to limit the noise pollution during the construction phase [s]?	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the DCO. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects.
LD2_FFD_364	Project description and DCO process.	Q10 [comments on the Cable Route Search Corridor] - I have mentioned my horror at the 13 mile cable route earlier in this submission. This alone should render the project unworkable - at best it is poorly sited ! Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - The Construction Period, as previously mentioned, will have a devastating effect on local communities - ill equipped to handle the vast amount of extra traffic, personnel and general disturbance over a protracted period. This is an industrial project sited in a rural, scenic, tourist area - it is NOT APPROPRIATE! Q12 [suggestions for on-site community benefits] - I will make no comment here - this project is poorly conceived, your staff at local briefings unable to answer some of the most basic enquiries and will devastate local communities and livelihoods ! The impact on local nature immeasurable!	No	More information regarding how the site was selected can be found in ES Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Report [EN010168/APP/6.3]. The Site Selection Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q13 [suggestions for off-site community benefits] - We have had this Carrot dangled in front of us locally with a recent smaller solar project - it sounds good but only happens once generation of power commences and does nothing to mitigate all the pain and disruption endured in the years before! Q14 [Additional comments] - It is well documented that in a few years time this technology will be redundant - what happens then - you have a 60 year lease ? This project is completely untenable , a blot on the landscape, a blight to local peoples lives and lifelyhoods! DO NOT PROCEED WITH THIS !		availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. The purpose of the Environmental Impact Assessment (EIA) process is to make sure that where any significant effects are identified, measures are put in place to reduce any negative impacts, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the ES [EN010168/APP/6.1] are thorough and have properly considered all impacts.
LD2_FFD_376	Site selection and alternatives / Landscape and visual / Ecology and biodiversity	[Other] - Security of de commissioning costs. Q4 [overall comments] - I am concerned that this location should not have been chosen for such a major single use development due to inherent inability to mitigate impact on landscape character, degradation of open rural landscape experience- particularly from	No	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		using PROWs, increased run off and impact on further flooding downstream, vulnerability of ground water, concentration of development on non grade 4 agricultural land and the consequent loss of food production and rapid detrimental change to rural life and impact on wildlife (particularly roaming species such as deer) over a wide and largely unspoilt environment. I am unconvinced that adequate sequential testing has been undertaken ahead of site selection. Q5 [comments on indicative masterplan] - The masterplan tries to retro fit massive swathes of development into an environment that is incapable of absorbing such a scheme. Any mitigation, however hard you try, will inevitably be tinkering around the edges as the site is fundamentally unsuitable for your development. The BESS sites are inappropriate due to impact on landscape, impact on PROWs, impact on Heritage assets and lack of safety of 24/7 access particularly for emergency purposes in times of flooding and also due to the impact of existing heavy infrastructure such as main line railway bridges.		The Scheme provides significant opportunities for landscape recovery and Biodiversity Net Gain . These mitigation and enhancement measures are shown in ES Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] and are described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) (Outline EPMS) [EN010168/APP/7.19]. The dynamic experience of the development from PRoW and Roads are assessed as a receptor with reference to representative viewpoints and verifiable photomontages in accordance with the Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and the Landscape Institute (17 September 2019) Technical Guidance Note 06/19 Visual Representation of Development Proposals. The Applicant is confident that the BESS site is appropriate and that all environmental impacts have been adequately considered within the relevant

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q6 [comments on design principles] - The design should recognise that solar arrays need to be broken down in terms of scale, both in plan and height (up to 4.5m) of panels to better fit into an open rural environment. Major elements of infrastructure (sub stations, BESS) should be better concealed by natural features, not just hedges that are slow to mature and are subject to degradation. Q7 [comments on the assessment of potential effects / Landscape] - The viewpoints are not “dynamic” along PROWS where the of enjoyment of the open landscape is not from a “pin point”’. Major infrastructure has not been analysed sufficiently by choice of viewpoints. Q8 [comments on the assessment of potential effects / Ecology] - The effects on roaming mammals and adequate compensatory feeding grounds for birds are concerns.		ES chapters. More information regarding the selection of the BESS site can be found in ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Fencing around solar panels will be permeable to all wildlife except deer, meaning most wildlife will be able to freely access habitat within solar array without the need for wildlife gates. Wide buffers will be retained around the peripheries of the Solar PV Sites which will allow wildlife including deer to move between favoured habitats. Potential impacts of the scheme on birds are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].
LD2_FFD_376	Hydrology, flood risk and drainage	Q9 [comments on the assessment of potential effects / Environment] - I am very concerned about the impact of rainwater run off from impermeable surfaces leading to soil erosion and increased volumes and	No	The Scheme has been carefully assessed to ensure that it will not increase surface water runoff or downstream flood risk. This is detailed in the FRA and Drainage Strategy in Environmental Statement

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		surges of rain water into the Gauze Brook and other drainage channels and the consequent impact on communities downstream. Have FRAs been prepared for settlements to include (not exclusively) Corston, Malmesbury, Great Somerford, Christian Malford parish, Chippenham, Melksham and Bradford on Avon?		(ES) Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] and reflected in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. A common misconception is that solar panels act like large impermeable surfaces similar to roofs or paving. In reality, the panels are elevated above the ground and widely spaced, allowing rainfall to drip onto grassed areas below. Studies such as Cook & McCuen (2013) and findings cited in UK guidance confirm that when grass or wildflower cover is maintained beneath solar panels, there is no measurable increase in runoff compared to undeveloped agricultural land. The Scheme replaces intensively farmed arable land with managed grassland beneath and between panels. This land use change is likely to reduce runoff overall, as the compacted soil and bare earth associated with cultivation will be replaced by established vegetation, which increases infiltration and intercepts surface flow. The panels also help to reduce direct raindrop impact on soil, lowering erosion

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				risk. The potential for concentrated flow beneath panel edges has been addressed by specifying wildflower planting at the leeward edge, which slows flow and filters sediment. The Scheme's built elements, such as substations and BESS compounds, will include formal SuDS features such as lined infiltration trenches. Runoff will be attenuated and discharged at greenfield rates, ensuring no net increase in flow to local watercourses. These areas represent only a very small proportion of the overall Site area. With respect to downstream communities, the Scheme sits within the Gauze Brook catchment. Hydrological modelling and topographic analysis confirm that surface flows from the Site do not drain toward Chippenham, Melksham, or Bradford on Avon. Receptors such as Corston and Malmesbury have been considered in the FRA, and the Scheme has been shown to have no material effect on downstream flood risk. In summary, the transition from arable to grassland, the retention of natural

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				infiltration in panelled areas, and the application of SuDS where needed mean the Scheme will not result in increased runoff or flooding. On the contrary, it may deliver local betterment in terms of reduced soil erosion and improved runoff quality.
LD2_FFD_376	Project description and DCO process	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - I am concerned that (with an off shore promotion company and little information on the potential eventual owner) satisfactory bonding arrangements for future decommissioning sums are not available for scrutiny or not being adequately provided at all. Q12 [suggestions for on-site community benefits] - I do not think any community benefits can satisfactorily mitigate the harmful effects of the development. Q13 [suggestions for off-site community benefits] - None Q14 [Additional comments] - I cannot print a copy of my feedback comments and my screen shots are not really satisfactory.	No	Regarding the concerns around decommissioning of the site, decommissioning liabilities will be taken into account as part of the Scheme financing process. Failure to comply with the requirements of a Development Consent Order (DCO) is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Could you e mail or post a copy of my comments back to me please.		The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance. The Applicant is in full agreement with guidance published in May 2025 by the Department for Energy Security & Net Zero (DESNZ)- 'Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure', which sets out that local communities should feel tangible and enduring benefit from their role in creating a low-cost, clean energy

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				system in the UK. Community benefits are already delivered on a voluntary basis around the country, and so the Applicant is confident that this approach is suitable for this Scheme. The Applicant notes the request for copy of the comments. It was not identified at the time of consultation as it was included within the feedback form rather than raised directly by email. The Applicant acknowledges this oversight and confirms that feedback received has been fully recorded and included within this Appendix.
LD2_FFD_458	Project description and DCO process / Community benefits and impact	Q4 [overall comments] - Need more detail, choice of equipment, images, survey reports and calculations Q5 [comments on indicative masterplan] - As it runs very close to my property my interest is the cable corridor and the proposals are light on details. Q6 [comments on design principles] - As it runs very close to my property my interest is the cable corridor and the proposals are light on details. Q7 [comments on the assessment of	No	Comment noted. The Preliminary Environmental Information Report (PEIR) provided a snapshot of the Applicant's assessment at that time, providing the information required for consultation bodies to develop an informed view of the likely significant environmental effects of the proposals. The Applicant considers the amount of information published during statutory consultation was sufficient and in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 , and that further statutory consultation is not required. A full assessment of all environmental impacts is now available in

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		potential effects / Landscape] - As it runs very close to my property my interest is the cable corridor and the proposals are light on details. Q8 [comments on the assessment of potential effects / Ecology] - Specifically the PEIR says "The Survey Area encompasses all land within the Scheme Boundary, including the Cable Route Search Corridor, although no field surveys of the Cable Route Search Corridor have been undertaken to date". We have seen both Water Voles and Greater Crested Newts around the wildlife pond and brook adjacent to our property and the cable corridor so would suggest these field surveys are carried out as a matter of priority Q9 [comments on the assessment of potential effects / Environment] - As it runs very close to my property my interest is the cable corridor and the proposals are light on details. Q10 [comments on the Cable Route Search Corridor] - Not enough detail, or description of the works and level of disruption to sensibly comment. Pleased that it's underground, concerned about the		the Environmental Statement (ES) [EN010168/APP/6.1]. Since PEIR the Cable Corridor Route has been surveyed, refined and assessments provided within the ES [EN010168/APP/6.1]. The Applicant welcomes the communities' recommendations for what benefits are considered of greatest benefit and use including potential on-site flood risk measures and wider off-site contributions. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. Potential impacts of the Scheme on ecological features are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. This includes an assessment of impacts on sensitive habitats and wildlife species they support. No significant adverse effects have been identified. Potential impacts of the Scheme on amphibians, including great crested newts

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		disruption and any long term damage. not clear why these routes proposed. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - N/A Q12 [suggestions for on-site community benefits] - Reducing surface water flood risk in the Whitley area would be a worthwhile benefit. Q13 [suggestions for off-site community benefits] - Shaw and Whitley village hall and community shop Q14 [Additional comments] - Really need to see details of equipment, installations, structures etc along with images and drawings.		are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. All waterbodies within the Scheme will be retained and protected ensuring no loss of breeding habitat. In addition a number of historic ponds that have been previously lost to agriculture (also known as 'ghost ponds') are proposed to be restored, as shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1], meaning there is expected to be an overall beneficial effect on ponds and associated species In terms of the concern regarding disruption during construction and/or decommissioning (including due to the construction of the cable route and horizontal directional drilling) this has been fully assessed within the ES [EN010168/APP/6.1], any likely significant effects of the Scheme have been identified and appropriate mitigation measures incorporated into the Scheme. Mitigation measures are contained within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] to limit disruption

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				during construction and/or decommissioning.
LD2_FFD_504	Landscape and visual / Cumulative Effects / Noise and vibration	Q4 [overall comments] - 1) the sheer scale of the industrialisation of so much of our landscape and farmland - especially given the proposed Leigh Delamere Solar installation and ones in Kington St Michael and at Forest Gate. The Fosse Way is of amazing historical importance, built by the Romans in 1st&2nd AD, and the Wiltshire Cycle Way will be massively impacted in terms of views and Cultural Heritage degradation. 2) the noise, disruption and pollution that will be caused to the parish, and particularly those living on the Alderton Road, such as myself. Thousands of lorry loads of construction equipment and building materials over an extended period will be transported back and forth in front of my house causing health issues such as continuous dust particles in the air. 3) the large scale, disfiguring earthworks needed to bury the cable which may go close to Grittleton Village Hall, the Ryleys Farm development and Sevington and which would cross farmland and tunnel under the	No	The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at Preliminary Environmental Information Report (PEIR) as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		M4 and local roads. Q5 [comments on indicative masterplan] - The sheer cumulative enormity of the size of the solar panels and battery installation along with many other solar projects in Wiltshire is deeply impactful		enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme been fully assessed within the ES. Existing solar farms are considered in the baseline of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]). Forthcoming solar developments are assessed within the cumulative and in-combination effects section of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]) and summarised in ES Volume 1, Chapter 21: Cumulative and In-combination effects. ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				by appendices in Volume 3 (12.1 to 12.7 [EN010168/APP/6.3]) has assessed the potential impact of the scheme on identified archaeological and built heritage assets. Where required appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3]. The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Environmental Management Plan [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects. As set out in ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1], construction dust emissions, construction vehicle emissions and emissions from Non-Road Mobile Machinery (NRMM) (onsite plant) have been considered for the construction phase. The assessment has been undertaken in accordance with best practice guidance. With the embedded mitigation measures in place, as set out in the Outline CEMP [EN010168/APP/7.12] and Outline CTMP [EN010168/APP/7.22], air quality effects as a result of the construction phase of the Scheme would not be significant.
LD2_FFD_504	Site selection and alternatives	Q6 [comments on design principles] - Solar panels can be on every household roof, farm building and large unit such as Leigh	No	As part of the Site Selection Assessment Report [EN010168/APP/6.3] , the Applicant has considered brownfield sites

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Delamere service station, Hullavington Barracks/Dyson buildings to improve self sufficiency and reduce the impact on the environment		listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites.
LD2_FFD_504	Project description and DCO process	Q7 [comments on the assessment of potential effects / Landscape] - As above, hugely impactful in terms of visual and historical impact reducing tourism to the area. Q8 [comments on the assessment of potential effects / Ecology] - Leave it as it is Q9 [comments on the assessment of potential effects / Environment] - N/A Q10 [comments on the Cable Route Search Corridor] - The cost and impact on the environment to create & install the cabling, plus creation of panels and batteries is detrimental to the environment and out weighs the business benefit. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - The amount	No	Information on need for the Scheme can be found in Environmental Statement (ES) Volume 1 Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1] and DCO Volume 7, Statement of Need [EN010168/APP/7.1]. Waste has been fully assessed within Chapter 20: Other Environmental Matters (Waste) and the effects deemed not significant. Waste during construction will be managed via a Site Waste Management Plan (SWMP). An Outline SWMP [EN010168/APP/7.16] has been prepared as part of the DCO application. Decommissioning waste will be managed as part of the Decommissioning Strategy (DS). An Outline DS [EN010168/APP/7.14] has been prepared as part of the DCO application. These documents will be developed into detailed documents by the selected contractor in

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		of wastage and landfill that will be create for the construction and decommissioning of the equipment does not make sense due to the sheet size and scale. Q12 [suggestions for on-site community benefits] - There aren't any community benefits that would provide good enough reason for this project to go ahead. Q13 [suggestions for off-site community benefits] - N/A Q14 [Additional comments] - N/A		agreement with Wiltshire Council prior to commencement of each stage.
LD2_CLE_463	Project description and DCO process	Dear Will, I have just received by post your Statement of Community Consultation, from which it appears that you have withdrawn the Whitley site from consideration as the BESS. I note that you appear to have added a site on Butler land to the west of us. However, it not clear from your hopelessly inadequate map on page 7 whether you have also added any fields within our sightlines to increase the size of the projected BESS. Please send us a large-scale map of all the fields which you propose to include now as	No	The Applicant has confirmed their intention to arrange a meeting to discuss updated proposals in more detail, including how previous concerns raised by residents and the wider community have been taken into account. They clarified the purpose of the recently published Statement of Community Consultation (SoCC), which sets out how and where statutory consultation will take place, and noted that the map within the SoCC is for consultation zone context only. The Applicant assured that detailed mapping and further technical information, including site selection, alternatives, and proposed BESS locations, will be provided

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the potential site for the BESS. When you visited us during the summer, you mentioned that it might move part of the BESS from the Branston field which adjoins our land to the other fields further north. This does not appear to have happened and I should like an explanation of why the fields further away from our Grade I listed home are less suitable. I should also like to be provided with a list of all the fields within your entire project map (and, if any, beyond) which you considered as alternatives for siting the BESS. If you did not evaluate any alternatives, please say so explicitly. If you did, I should like to see the technical evaluations and a full statement of reasons why such alternatives were rejected. In fact, these should be publicly available as part of the public consultation. In view of the imminent public consultation, I should be grateful for an immediate response. Yours sincerely,		in the Preliminary Environmental Information Report (PEIR) and Non-Technical Summary (NTS), to be published on 29th January at the start of the consultation period. They also confirmed that the updated design will show increased distance between BESS locations and nearby residences. Finally, the Applicant proposed meeting dates and shared a list of public consultation events, offering to meet one-on-one during any of these sessions.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		██████████		
LD2_CLE_464	Project description and DCO process / Cultural heritage / Other Environmental Matters (Battery Safety)	Dear ██████ Thank you for your swift interim response. We shall be very glad to meet you again to discuss how (if at all meaningfully) you plan to address our particular concerns. Are you able to offer any dates next week? We do require full answers to the questions posed in my last e-mail about alternative sites for the BESS and why you have chosen a site as close as it could possibly be to our Grade I listed home. There are only 9000 Grade I listings in the entire UK. Many are world-renowned, like Buckingham Palace and Westminster Abbey. Whilst ██████████ is not so famous, by definition it is of "national importance in terms of its architecture, history and social significance". It is quixotic of Island Green Power to select fields only yards from it - out of all the 2500 acres available to you - to site 200 batteries	No	The Applicant acknowledged concerns raised in relation to battery safety and property impacts and suggested that a face-to-face meeting would be the most constructive way to address these points and present the updated design proposals. Further feedback during this discussion was welcomed. The stakeholder accepted the offer to meet, and an in-person meeting was held on the 13 February 2025. The Applicant invited any questions in advance of the planned publication of consultation materials on 29th January 2025 The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at Preliminary

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the size of a double-decker bus, surrounded by 15ft high security fencing, intrusive bright security lights, a massive inverter plant and other paraphernalia - completely wrecking the setting of the house which has stood sentinel over its surroundings for 700 years. This outrage calls for a full and immediate explanation. Quite apart from the obvious heritage and landscape issues, we are also extremely concerned about the dangers of thermal runaway posing a serious risk to health. There is no point in your arguing that these risks are small. Without your project, there is zero risk. With it, we are directly threatened by a potential life-threatening catastrophe through the release of toxic fumes. This is not an academic consideration for us. If we were fatally poisoned, it would be no comfort to be told it was a one-in-a-million chance. Today's "Mercury News", of San Jose, California, reports a thermal runaway at the 750MW Moss Landing solar plant : Evacuations lifted near Moss Landing		Environmental Information Report (PEIR) as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		battery plant after flare-up earlier Friday If such a fire occurs next to us, it would also have wider repercussions - including the closure of Network Rail's West Coast Main Line for an indefinite period. We look forward to receiving a detailed written response as well as the opportunity to meet you again in person. Yours sincerely, ██████████		Toxic gases from any fires are also assessed within ES Volume 1, Chapter 15: Air Quality and ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7 Major Accidents and Disasters [EN010168/APP/6.1]. An assessment of how these fumes could impact all sensitive receptors within a 1km radius of the BESS area which includes residential properties and species is provided in ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1] which concludes that no significant off site impacts are predicted should a fire event occur.
LD2_CLE_465	Project description and DCO process / Climate change and energy need / Consultation and engagement	Dear ██████ 1. I e-mailed you on 16 January and 29 January with a series of questions relevant my response to the statutory consultation. ██████ and I also met you and other IGP staff at Bradfield Manor on 13 February, where we principally discussed the impact of your proposed development on Bradfield Manor. 2. Further questions arose at that meeting -	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which address these and related comments as part of its application. The Applicant makes note of this comment. The Applicant undertook its consultation in compliance with commitments made in its published Statement of Community Consultation (SoCC). The SoCC is presented in Consultation Report Appendix D:

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		particularly in respect of the alternatives which you had considered for siting the 400,000 volt substation and the BESS. No clear answer was given. 3. You were also not able to confirm the number of batteries to be sited near us. 4. Nor were you able to confirm the line of cable route from the substation to Melksham, even within the limited parameters of your cable corridor. You were also unable to state what alternatives to that corridor you had explored and rejected or give reasons for such decisions, if any. We do need answers now - particularly to the factual question of rejected alternative sites. 5. As to the commercial viability of the project, you were not able to state the minimum strike price IGP assumes to enable it to go ahead. This is vital information which should be public knowledge in view of the overwhelmingly negative impact the project has on property prices, not to mention people's lives.		Preparation of Statement of Community Consultation (SoCC) [EN010168/APP/5.2]. To support responses to the consultation, the Applicant published a range of consultation materials including a Community Consultation Leaflet summarizing the proposals, a Non-Technical Summary of the Preliminary Environmental Information Report (PEIR), held a series of in-person and online information events where the proposals could be discussed with members of the Applicant Team, and hosted free-to-use Scheme communications channels for enquiries. If a member of the Applicant team was unable to answer a question the consultee was invited to submit their question to the Applicant who would then subsequently respond.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Even prior to the application, your project has turned people's lives upside down, causing sleepless nights and massive psychological stress - not least because it has caused chaos in the local housing market. We speak from deep personal experience. Unlike the handful of foreign multi-millionaire investors and local rentier landowners who stand to line their pockets directly at our expense, most of our life savings are tied up in our house. Should we need to move on grounds of age or ill-health (a distinct possibility when aged [REDACTED] we are advised that it would now be impossible to realise our principal asset without a protracted delay and at a fire-sale discount. As I said in my e-mail of 29 January: "The vistas from Bradfield Manor towards Bradfield Wood and towards Norton are going to be completely wrecked, gravely damaging the setting of our Grade I listed home. There appears to be no mitigation of this whatsoever by screening with trees - which would have to be semi-mature and		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		planted now to make any appreciable difference for the next generation, let alone us. The saleability and value of our home is bound to be significantly reduced. You are effectively siphoning money out of our pockets (and our home is overwhelmingly our principal asset) into those of your billionaire investors. At [REDACTED] years-old, we are extremely worried that your bombshell project significantly constrains our ability to move without catastrophic financial loss." I also said in my e-mail of 16 January: "There are only 9000 Grade I listings in the entire UK. Many are world-renowned, like Buckingham Palace and Westminster Abbey. Whilst Bradfield Manor is not so famous, by definition, it is of "national importance in terms of its architecture, history and social significance". It is quixotic of Island Green Power to select fields only yards from it - out of all the 2500 acres available to you - to site 200 batteries the size of a double-decker bus, surrounded by 15ft high security fencing, intrusive bright		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		security lights, a massive inverter plant and other paraphernalia - completely wrecking the setting of the house which has stood sentinel over its surroundings for 700 years. This outrage calls for a full and immediate explanation." 6. Yet, even if a DCO is granted in two years time or so, there is no guarantee that the project will be viable because that is determined overwhelmingly by the strike price for solar-generation. That, in turn depends on how much pain the Government wishes to inflict on the public to pursue its net zero obsession. Much depends on global oil and gas markets, especially with the dramatic policy changes introduced by the Trump administration (a) scrapping renewables targets and subsidies and (b) removing restrictions on oil and gas production. The lower oil and gas prices, the higher the renewables cost to the voters. As we get towards 2029 all eyes will be on the next election, with Reform-UK proposing a windfall tax on excess profits from developments like Lime Down. The political risks for projects like yours will inevitably rise		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		rapidly before any DCO decision is made. I asked you what minimum strike price IGP were assuming for Lime Down's commercial viability. You were unable to tell me but said you would find out. Please may I now have that information? 7. It is difficult to see how any public consultation can sensibly take place without such information. It is vital to an assessment of viability and its cost to the general public. It is important to the consultation because, if your project ultimately proves abortive, the costs and losses you have imposed on people like us would have been totally pointless. 8. You and your staff persistently say at the public meetings that solar does not enjoy a subsidy. This is completely untrue. Lime Down would never be commercially viable without Government coercion - through (a) taxing oil and gas (e.g. via ROCs) and (b) forcing consumers and taxpayers to pay higher electricity bills to subsidise your putative profits (see last year's CfD auction price differentials and		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Feed-in Tariffs). 9. The latest government mid-range projections I have seen for the price of gas are around 70p/therm or £24/MWh. With a fuel efficiency of 53%, that works out at £45/MWh of electricity produced. 10. In 2024 money, Allocation Round 6 (AR6) offered £85 per MWh for solar power, £89 per MWh for onshore wind, £102 per MWh for fixed offshore wind, £246 per MWh for floating offshore wind. 11. Far from receiving a subsidy, gas generation is taxed via the mechanism of Renewables Obligations Certificates to produce 'levelised costs'. The concept of 'levelised costs' is a Government racket to disguise the true cost of renewables subsidies in our electricity bills and compel people (including those who have just lost their Winter Fuel Allowances) to pour billions of £££ into the pockets of rentier 'investors' like Maquarie and your 6 Irish multi-millionaires. 12. ROCs cost over £7 billion a year - which ends up on everyone's electricity bills, poor and rich alike. ROCs add about £60 per MWh to mega-solar schemes' revenue		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		stream, meaning that the costs of electricity generated by schemes like Lime Down amount to £145 per MWh when the value of the certificates is taken into account. 13. In addition, we pay extra for balancing the grid when the wind is not blowing (or blowing too hard) and the sun is not shining. In the year ending March 2024, these balancing services cost £2.46 billion. Most of these costs should properly be attributed as a cost of intermittent renewables because the double-banking of CCGT power stations would not be necessary if the Government left power generation to the market without coercion. That is a total of over £12bn being paid to or because of renewables each year - 7 times the supposed saving to the Treasury of scrapping Winter Fuel Allowances. I should be grateful for your confirmation that the figures quoted above are correct and that you accept that your project would not be viable without the scale of subsidies on offer. 14. LAND RESTORATION AT END OF		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		PROJECT LIFE In my e-mail of 29 January Q3, I said: "Solar park" is another misleading euphemism. It is a solar industrial complex which will bury the fields under a wasteland of panels for up to 60 years i.e. effectively the lifetime of today's teenagers and anyone older. (iv) What provisions are to be put in place to guarantee restoration of the land at the end of the project's life? (v) Will you provide for a bond to finance this? (vi) If not, how do you intend to fix the landowner or his successors in title with the obligation to restore to the land? What legal mechanism do you propose to ensure that such an obligation can be financed and enforced in 60 years time? (vii) What, at current prices, do you estimate the current costs per acre of removal of the panels and associated infrastructure plus full restoration of the soil?		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		(viii) How does that compare with the current value per acre of the land for farming - a calculation obviously essential to the credibility of any commitment of yours to restoration? (ix) If you have made no such calculations, please say so explicitly and explain why you have not produced them for the consultation. Please can I now have answers to these questions as part of the consultation? 15. In my e-mail of 29 January Q4, I said: You say on your website: "The project is anticipated as being able to deliver up to 500 megawatts (MW) of renewable electricity through ground-mounted solar photovoltaic (PV panels). This is enough clean, affordable electricity to power approximately 115,000 homes every year." This is also a highly misleading description of the likely electricity output. The following questions need answers to		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		provide an honest evaluation of its likely contribution to electricity supply: (xii) For how many minutes per year do you estimate supplying 500MW into the grid? (xiii) How many MWh of electricity do you estimate supplying to the grid from the panels on the average day throughout the year? How many average houses would this supply and for how long? (xiv) How many MWh of electricity do you estimate supplying to the grid daily on average in the months November-Fenruatry inclusive and how many average houses would this supply and for how long? The Gridwatch website today shows that last year, maximum output of solar-powered electricity was 10.327 GW and the average output level was 1.451 GW - a mere 14% of maximum output, let alone of theoretical capacity. Actual maximum output can never reach theoretical maximum for obvious reasons, transmission losses, degradation of panels etc. So the thermal efficiency coefficient is even lower than those figures indicate.		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		It is, therefore, grossly misleading to claim a theoretical figure which can never realistically be attained. (xv) Please disclose the projected actual output figures for different months throughout the year (based on historical experience). Your business plan must have required such calculations for obvious due diligence reasons - without them you would not be able to calculate realistic figures for potential profits and rate of return. Capacity figures are at their most misleading in the winter, when the days are shortest and the weather at its worst - when electricity demand is highest and solar panels are least efficient. The actual capacity of solar on Friday (i.e. 24 January) - more than a month after the solstice, the shortest day, between the hours of 0820 and 1700 was zero, nothing, zilch. There wasn't enough photo-voltaic energy to generate a single watt of electricity Solar power production as a percentage		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Solar power production as a percentage GB Solar Generation as a percentage of total Please, could you explicitly say whether you agree with this analysis or, if not, provide full reasoning (with evidence) for disputing it. The public who will be forced to pay for Lime Down's profits through higher electricity bills and taxes have a right to know the truth - not misleading soft-soap propaganda whose aim is to enrich further your foreign billionaire corporate and multi-millionaire private investors. 16. MISLEADING INFORMATION IN 'STATEMENT OF COMMUNITY CONSULTATION' 2. The photographs you have chosen to illustrate your Statement of Community Consultation are highly misleading. (a) Page 9 has a full-page photograph of a trackway, carefully angled to conceal the reality of an array of solar panels enclosed		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		by a fence. The panels you have chosen to illustrate are also static and much smaller than the adjustable tracking panels you propose for Lime Down, which is also misleading, especially in a consultation document: "Nothing to see here; move along, please." (i) Could you please tell us why you have not chosen to illustrate your PR material with photographs showing the true size and scale of the panels you propose to use - or the various options available to you. (ii) Could you please tell us how many solar panels will be used in the project if a DCO is granted and what proportion of the total land area will be covered by panels and how much by trackways? (b) Page 21 shows an oak tree taking up 80% of the page, a fence taking up another 18% or so and a thin strip of panels partly concealed by the fence taking up only about 2%. (c) The photograph on page 30 does not even bother to show solar panels at all and contains a footpath post with everything else		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		out of focus. (iii) Could you please explain why these particular photographs have been used and why you have not chosen photographs which show the real scale of the landscape intrusion and destruction which your project will cause? Do you think consultees will not notice this mis-selling of your project? Whatever claims are made in its favour, Lime Down is bound to destroy many square miles of agricultural land and blight a much greater area of landscape vistas. I recognise that to provide full and frank answers to these questions requires a lot of work. But you have millions of pounds and as much professional expertise as you need at your disposal and should have published the information already so that the public could make an informed response to your consultation. Failure to do so implies that your consultation is actually a 'nonsultation' box-ticking exercise to enable you to make cosmetic amendments to reduce public outrage.		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		I should be grateful for your early reply, even if you provide the answers to my questions in stages.		
LD2_FFD_534	Project description and DCO process / Landscape and visual / Ecology and biodiversity / Cultural heritage / Transport and access	[other] - BESS safety and regulation; Property Prices; Decommissioning; Alternative technology; Operators and Financers looking after British countryside Q4 [overall comments] - Horrifically proposed. Terribly located. Overwhelming scale. Archaic technology within 7 years. Impossible logistics. Horrendous risk to both livelihood, life and community. Q5 [comments on indicative masterplan] - Can't even begin to comment on this given you have not produced the ES and until such time as that is forthcoming any comments are worthless as we have nothing clear, concise to comment on. Q6 [comments on design principles] -Very straightforward - wrong place. wrong country. wrong scale. wrong technology. wrong ownership. Zero local support (apart from [REDACTED]) Simply unviable. Unaffordable. Ineffective technology in an area that will provide ongoing food security.	No	Comment noted. A full assessment of all environmental impacts is now available in Environmental Statement (ES) [EN010168/APP/6.1]. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
LD2_FFD_534	Landscape and visual / Cultural heritage	Q7 [comments on the assessment of potential effects / Landscape] - Pasture land around Norton has been there for 4-600 years. It is a landscape that is incredibly rare with an immense amount of heritage. The list of important Ways that pass through this area are endless. The listed houses within this microcosm of the country includes within less than 1000m of your proposed BESS an outstanding farmhouse, Grade 2 listed, an	No	The Scheme provides significant opportunities for landscape recovery and Biodiversity Net Gain . These mitigation and enhancement measures are shown in Environmental Statement (ES) Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] and are described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 2:

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		exceptional and very rare Manor House Grade 2* listed. A further Manor House with significant outlook and views, again Grade 2* and one of the incredibly rare Grade 1 listed houses in the country. The protection that we give these properties for centuries has been immense both in terms of how you view from and to them. Within a moment, you are proposing to rip up all the rules, put aside hundreds of years of heritage and culture (let alone the cultural heritage and fabric of our beautiful country buildings) and cover the land, the views, the outlook, the in look, from areas of National Landscape (AONB) from protected and cherished buildings with these hideous panels. The Glint and Flare, noise and vibration all have implications for these buildings and this landscape. The mitigation that you propose to create these new hedgerows or boundaries or new planting of trees fundamentally is completely and utterly out of keeping with the landscape that exists now, the same as it did 500 years ago. To suggest that you can mitigate putting up glass and steel over thousands of acres of land and "hide" it is ridiculous. The whole cultural landscape of this area will be destroyed completely. There are no undertakings from you, or any suggestion, that, if planning would be granted, that at the		Outline Landscape and Ecological Management Plan (OLEMP) (Outline EPMS) [EN010168/APP/7.19] . The new green infrastructure is to remain in place following decommissioning to provide a legacy landscape. ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by Volume 3, Appendix 12.1: Heritage Statement [EN010168/APP/6.3], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] for embedded mitigation and Section 12.11 for additional mitigation). It has been identified that there would be a Moderate/ Minor adverse effect (not considered significant) as a result of indirect (i.e. setting) impacts caused by the location of solar panels in the fields to the north of the designated assets.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		end of the term of the project, you would return the landscape, the roads, the verges, the hedges, the treelines, to the way they are today. The mitigation proposals which you claim will take 15 years to reach their potential would all have to be removed at the end of the term. There are no costings, no promise, no accountability that this would happen. The landscape would be left with a bunch of hidden fields and lost distant views that would no longer be connected in any way through the creation of what is a false landscape without any serious consideration for what was there before.		
LD2_FFD_534	Ecology and biodiversity	Q8 [comments on the assessment of potential effects / Ecology] - We will be commenting much more in due course as again the information you have provided is severely lacking. What we do know is that we have significant populations of deer, dormice, songbirds, ground nesting birds, crested newts, nesting bats and everything and anything that is on the list of protected species is here, including wild flowers, orchids and the like. It is more than likely that we have flora and fauna that have yet to be discovered. Biodiversity figures are incredibly misleading. You use the percentages under the formula that is provided by the government, however I would challenge this as being highly	No	Potential impacts of the Scheme on habitats, protected species and species of conservation concern are assessed in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . It is acknowledged that not all information on ecology was presented at PEIR stage. The purpose of PEIR is to provide a preliminary assessment of the ecological effects of the proposed scheme. As such finalised assessments are not provided at PEIR to allow the Applicant time to take on the feedback received at Statutory Consultation and work this into the design envelope to be submitted in the DCO application. The Applicant is confident that

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		ineffective as again it does not take into account all the other issues that you have listed in this response, which should be considered together. The traffic proposals, we will come on to but the traffic rates, volumes, down such limited routes will have a devastating effect on mammals and birds within the proposed project. The Traffic damage and mitigation that you will need to do in order to make this project even remotely viable will have a remarkably damaging impact on verges, hedgerows, ditches, cotswold stone walls that have been in place for hundreds of years. Again, you have refused to confirm that the devastation that you cause to verges, hedgerows will be returned to the way they are today, the moment that construction of the project is completed (if you get planning). As with all mitigation and all allowances that you have made including increasing roadways to motorways, the decommissioning process and the detail that you have provided is inadequate. All actions you have taken during the term of the proposed project must be returned to way they were. Providing other solutions to biodiversity does not work - everything is linked together - all has implications that need to be returned. No plan. No obligation. No accountability		the assessments provided in the ES are thorough and have properly considered all impacts to ecology.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_534	Climate change and energy need	Q9 [comments on the assessment of potential effects / Environment] - Where to even begin? The implications of this project are vast and far-reaching—too extensive to fully detail here. The fact that the UK ranks 209th out of 210 countries in terms of suitability for solar energy speaks volumes. The current "solar gold rush" will likely be over by 2032, leaving behind a legacy of outdated technology and environmental harm. I firmly believe that the carbon debt of these solar panels will not be offset within the project's lifetime. Worse still, there has been no consideration given to the decommissioning and recycling of millions of panels, which will become obsolete within a few years.	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses these and related comments as part of its application. Note that although other countries may, according to the World Bank report, be more suitable for solar development, (a) any development outside of the UK will need to be linked to the UK grid to contribute to a reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it also does not follow that the UK is 'unsuitable' on an absolute scale for solar development. Therefore, Government has concluded from its analysis that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" [NPS EN-1, Para 3.3.20]. As set out in Environmental Statement (ES) Chapter 7: Climate Change [EN010168/APP/6.1], the GHG assessment concludes that the renewable energy generated will offset the carbon investments.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Over the Scheme's lifespan, it is estimated the Scheme will result in a net saving of 223,801 tCO₂e if tracker panels are used or 259,030 tCO₂e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used. The GHG calculations account for the solar panels embodied carbon, including manufacturing and transportation emissions. Recycling panels has been shown to have a benefit impact in terms of climate change in comparison with virgin extraction. The assessment considers virgin extraction GHG emissions for the replacement as a worst case scenario.
LD2_FFD_534	Other Environmental Matters (Battery Safety)	The Battery Energy Storage System (BESS) is perhaps the most alarming aspect of your proposal. It touches on every critical issue: ecology, accountability, environmental impact, public health, fire risk, landscape degradation, food security, and public safety. You have vaguely suggested that the BESS may need to be replaced five times over the project's lifespan, but you have provided no details or evidence to support this claim. The environmental cost of such replacements—including traffic, diesel	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Safety Management Plan (OBSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		vehicles, roadworks, and the recycling and decommissioning processes—is staggering. Yet, you have failed to provide any data on the carbon footprint of producing, transporting, installing, maintaining, and eventually decommissioning these panels and batteries.		and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities, workplaces, transport links, etc.); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Scheme directly helps to address by providing a secure, low-carbon source of electricity Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. The effects of emissions generated from embodied carbon within products to be used on site as well as construction, operation and decommissioning emissions are all considered in Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1]. The CO₂e figures are included in detail within the ES Chapter. Emissions from production of the required cables are included within the assessment. ES Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1] concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				contributing to decarbonisation of energy from the National Grid. As outlined in the ES Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1], the emissions of replacing the solar panels, inclusive of the embodied carbon (manufacturing and transportation emissions) are considered in the assessment. The DESNZ conversion factors, which were used for the assessment of embodied carbon, cover the extraction, primary processing, manufacture and transportation of materials. Baseline and future conditions are set in section 7.7 of ES Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1]. Although, it is expected there will be some baseline emissions from the Site's current use and some carbon sequestration from the grassland once the Scheme is in place, as a conservative approach, the baseline emissions and the grassland sequestration were considered zero.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_534	Climate change and energy need	Given the 23-kilometer cable route to Melksham, the sheer scale of work, the number of vehicles involved, and the energy required, I challenge the notion that this project will yield any meaningful climate or environmental benefits. In fact, I believe the net impact will be close to zero. This project appears to be nothing more than a profit-driven scheme for an offshore financial institution with a notorious track record of mismanaging UK infrastructure. The only "green" here is the "greenback" lining their pockets. I demand that you provide climate-based evidence demonstrating that this project will have a positive environmental payback—from the lime used in construction one year ago to the eventual decommissioning—and that this payback benefits the climate, not your profits.	No	The Applicant stands by its claims relating to the net benefit in terms of GHG emissions of the Scheme, as set out in Environmental Statement (ES) Chapter 7: Climate Change [EN010168/APP/6.1]. Over the Scheme's lifespan, it is estimated the Scheme will result in a net saving of 223,801 tCO₂e if tracker panels are used or 259,030 tCO₂e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used.
LD2_FFD_534	Project description and DCO process	Q10 [comments on the Cable Route Search Corridor] - We have no information of any detail on this grid connection. You are going through potentially some grade 1 or 2 listed land that is very important. It's too far. Take too long. You need to do another consultation once you have decided on the route.	No	Soil surveys have been undertaken in the Cable Route Corridor. No land of Grade 1 quality has been identified. Approximately 10ha has been classified as Grade 2.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_534	Decommissioning and construction / Transport and access	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Construction - you are limited to 3 routes to all sites - there is no access from the north, east, west. In every case, you are coming from the south. There has been no suggestion of a plan B if anyone of the 3 proposed routes are compromised. The risk is immense as it will put pressure on other single track lanes into this important cultural landscape. In all cases, every access route involves at least 1 bridge either over or under. In at least 2 cases, these are incredibly limited; these are also limited in terms of rescue services that may be require if a major incident happened (either LDS related or not) During the 2 year construction period (which I suspect will be much longer due to limitations on these 3 routes) the risks to livelihoods, socio economics, welfare, health is going to be immense. I don't believe that this construction would withstand the backlash from local business and community who once they are affected would be up in arms. The very few outspoken supporters that you have, I suspect will be horrified by the construction process. In terms of operation. Macquarie has a track record which speaks	No	Regarding the decommissioning concerns, decommissioning liabilities will be taken into account as part of the Scheme financing process. Failure to comply with the requirements of a Development Consent Order (DCO) is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This will be a requirement of the DCO. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been submitted with the DCO. All height restrictions along the routes can and will be adhered to.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		for itself. They raped, pillaged and destroyed Thames Water all for the benefit of their own shareholders. This is not fiction - this is well documented fact. It is an outrage and they should never be allowed anywhere near UK infrastructure. The benefit for local residents is zero. We know there is a blight on the suggestion of solar. What we all don't know but I suspect, is that during construction house prices within the area and possibly 10 miles, will all be impacted by the process and in all cases house prices will be significantly reduced and will remain so thereafter. You have failed to include this within your scoping and proposal. Construction, operation and decommissioning will have huge impacts on land and house prices within the area. 15-35 %. Decommissioning - there is no information - no responsibility on your side. This will be sold so many times - will be outdated within 7 years so someone will be left holding the baby - the likelihood will be the landowners and tax payers. In terms of operation - we know and it's very clear that solar production within the likes of Spain - the only reason this is being proposed here is in order to get a BESS - we all know that a BESS is a		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		trading platform and has nothing to do with green energy or with saving the planet. It is purely a financial mechanism to trade energy and that is an outrage. I challenge you that if the BESS wasn't included, which we originally asked, then you wouldn't do this project. Likewise if you applied for planning for just the BESS, you know that you'd never get it. Therefore the ripping up of our culture and landscape with millions of solar panels is purely a means to an end to create a cash cow.		
LD2_FFD_534	Community benefits and impact / Site selection and alternatives	Q12 [suggestions for on-site community benefits] - no community benefit Q13 [suggestions for off-site community benefits] - investments in greener technology - UK produced that will benefit the UK. Not impacting farmland and food insecurity, not impacting landscapes and heritage but that would be far more effective - nuclear and hydrogen.	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				they would like to see benefitting from the available funds. The Community Benefit Fund is separate from the Development Consent Order (DCO) process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance. The Applicant is in full agreement with guidance published in May 2025 by the Department for Energy Security & Net Zero (DESNZ)- 'Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure', which sets out that local communities should feel tangible and enduring benefit from their role in creating a low-cost, clean energy system in the UK. Community benefits are already delivered on a voluntary basis around the country, and so the Applicant is confident that this approach is suitable for this Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_534	Project description and DCO process / Socioeconomics, tourism, recreation and health	Q14 [Additional comments] -We have questioned this project from the very beginning—within minutes of its announcement. For me, the most alarming aspect has always been the proposed 60-year term, and it remains my greatest concern. The sheer length of this commitment has profound implications for every aspect of your proposal. Over six decades, the mitigation measures required for trees, hedgerows, and other natural features will be immense. The walks and landscapes that people cherish today will be irrevocably altered, and the heritage and culture of this area will be lost forever. ██████████ spoke about her 2 MW solar farm, emphasizing that it was a short-term project designed to be decommissioned, with the land and community restored to its original state. This stands in stark contrast to your 60-year plan, which raises serious questions about the long-term impact on our community and environment. I also challenge whether the landowners you've signed up fully understand the extent of their obligations over such a lengthy period. Had this been a 10- or 15-year project, the	No	Impacts on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the Environmental Statement (ES) (see Consultation Report Appendix B: EIA Scoping Opinion [EN010168/APP/5.2]). This is because there is no empirical evidence that industrial scale solar farms cause significant long-term adverse effects on property prices. Whilst it is acknowledged that there have been no completed >50MW solar Schemes in the UK, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and healthcare providers) are likely to be more important factors in changes to property prices. Furthermore, there is a difference between short-term troughs in property saleability as unknown details of the Scheme are still being progressed versus the long-term property value once the Scheme is operating and mitigation set in place.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		situation might be different. But 60 years? By then, my generation will be gone, and our grandchildren will inherit a landscape that is unrecognizable—all for technology that will likely be obsolete long before the project's end. This brings me to two critical questions: Landowner Agreements: Do you have documented, unequivocal agreement from every landowner for a 60-year commitment? If the term includes a one-way extension option, are all landowners fully aware and supportive of this? Can you provide evidence of their consent? Commercial Viability: Can you confirm that this technology and site will remain commercially viable for 60 years? Given the rapid pace of technological advancement, it seems highly unlikely that this infrastructure will still be relevant or efficient by the end of its lifespan. The 60-year term is not just excessive—it is irresponsible. It locks future generations into a project that may no longer serve any purpose, while permanently altering the landscape and way of life we hold dear. The impact on my business has been		The Applicant acknowledges that the Scheme is likely to change community sense of place and appreciation of their surroundings, how they identify with them, and the potential this has for mental health impacts. The communities most immediately affected are assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1], and the Applicant is committed to ensuring sufficient mitigation measures are put in place to minimise adverse impacts. The Applicant confirms that Lime Down Solar Park Ltd has entered into option agreements with landowners. These agreements put in place legally binding obligations to lease land that is being proposed for solar panels, substations, energy storage and other associated developments relating to the Project. These agreements are industry standard and provide landowners with certainty and protection over the use of their land while securing development rights for the Project. A detailed assessment of the likely significance of effects of the Scheme on

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		devastating. As a well-established and respected buying agent for the Cotswolds, the fact that my own property has been blighted by the proposed solar complex is deeply distressing. I pride myself on being the first to know about factors that affect property values, including development plans, blight, and damage limitation. Yet, this proposal has been handled in a cloak-and-dagger manner, even among people I have known for 50 years. It has torn our community apart, fracturing long-standing friendships and creating an atmosphere of mistrust. Since this project was announced last year, my business has suffered significant financial losses. For you to dismiss the impact on property values as unimportant is not only dismissive but entirely unreasonable. I live at the heart of your proposed development, and it has been incredibly challenging to explain to my clients why I was unaware of something so significant happening on my own doorstep. As a self-employed professional with a team of five people relying on our work, the ripple effects have been far-reaching. Directly, I have lost business—within months of the announcement, I saw a decline of at least		employment and the economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. This assessment considers the impact on construction and engineering, agriculture, and potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		£80,000 in revenue. I strongly challenge the assertion that your proposal will not affect property values. The reality is that there has never been a solar project of this scale built in the UK, so any assumptions you make are entirely speculative. However, I have concrete evidence that even smaller developments—those under 50MW—have had a substantial negative impact on property prices. This project will be no exception, and I will continue to highlight its consequences for our community and livelihoods. Local families are the heart of this community, and my roots here run deep. I grew up alongside the [REDACTED]—my great aunt and uncle lived in [REDACTED]. The [REDACTED] are my cousins, and the [REDACTED] have been part of our lives since childhood. My mother and [REDACTED] shared a beautiful friendship that enriched our lives. Our first dog, Biddy, came from the [REDACTED], and together we walked the very land that is now threatened by this industrial solar development. [REDACTED] cherished this land, and [REDACTED] book, with its heartfelt dedication to the landscape and properties		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		within this area, captures the essence of what makes this place so special. For us, this land is not just a backdrop—it is fundamental to our way of life. We live here because we love the countryside, our community, and the deep history that stretches back to the Romans. For you to suggest that you can strip this away and replace it with an industrial landscape is an outrage. We are determined to fight for this land, for our heritage, and for the future of our community.		
LD2_FFD_539	Project description and DCO process	Q4 [overall comments] - Traditional British countryside should not be used for large scale solar farms, it should be kept to brown field sites and integrated into railway cuttings besides motorways or railways Q5 [comments on indicative masterplan] - Thankfully it looks more thoughtful with planting and distance to homeowners who will be affected however it is not appropriate for the area and many people do not wish to see this here when passing let alone living. I know there is noise from these in operation so audio as well as visual will be affected. Q6 [comments on design principles] -Nice ideas. Wrong place	No	National Policy Statement EN-3 Paras 2.10.24 & 2.10.25 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSS. This point is expanded upon in the Statement of Need [EN010168/APP/7.1] in particular in Section 4.3. Chapter 8 of the Statement of Need provides evidence to support the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q7 [comments on the assessment of potential effects / Landscape] - Whist agriculture changes over the generations this is a huge alteration going far beyond acceptable. From a Roman road to Cotswold buildings steeped in history it is altering the green and pleasant land beyond that for too long. Q8 [comments on the assessment of potential effects / Ecology] - Great ideas to help screen the solar monotony but it is still there and the planting takes many years to establish and the failed planting will not be replanted I imagine as with previous experiences. Q9 [comments on the assessment of potential effects / Environment] - N/A Q10 [comments on the Cable Route Search Corridor] - I appreciate this is the closest largest area to The grid available however that does not make it the right place to construct such a site and now the areas between have upheaval Q11 [comments on the assessment of		suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		potential effects during construction / operation / decommissioning] - Using the fosse two to three times a day I am sure my family will be inconvenienced Q12 [suggestions for on-site community benefits] - Access to reduced price solar equipment Q13 [suggestions for off-site community benefits] - Access to reduced price solar equipment Q14 [Additional comments] -The amount of money wasted on this project for something which should be turned down. The time and grievance sorrow and potential loss. The drop in house values due to being built in the wrong place in the beautiful British countryside		from the layout assessed at Preliminary Environmental Information Report (PEIR) as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1].The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.
LD2_FFD_634	Project description	Q4 [overall comments] - Roads are not suitable for volume of traffic. Wiltshire	No	Construction vehicle movements will be managed through a Construction Traffic

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	and DCO process	already has the largest area of solar farms in the country. The Fosse Way is a Roman road and the surrounding area should be left intact. We need to support Farmers in growing local food. Q5 [comments on indicative masterplan] - Near to an area of AONB and the rare great crested newt has a habitat off to the Fosse Way. There are also protected bats. We do not need dangerous batteries, high volume of traffic etc. Building the infrastructure probably negates the value of solar power. It creates dirt, pollution, damage etc - all of which are most unwelcome Q6 [comments on design principles] - No sensitivity to land use. This land should be used if for agricultural purposes. Q7 [comments on the assessment of potential effects / Landscape] - Not considered environmental impacts Q8 [comments on the assessment of potential effects / Ecology] - N/A Q9 [comments on the assessment of potential effects / Environment] - N/A		Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise. Environmental Statement (ES) Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by appendices in Volume 3 (12.1 to 12.7 [EN010168/APP/6.3]) has assessed the potential impact of the scheme on identified archaeological and built heritage assets.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q10 [comments on the Cable Route Search Corridor] - Disruption to excavation along the route which is too far away from the proposed solar farm Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Environmental impact will be significant Q12 [suggestions for on-site community benefits] - No community benefits Q13 [suggestions for off-site community benefits] - N/A Q14 [Additional comments] - N/A		Where required appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy [EN010168/APP/6.3]. The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. High voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Several factors were considered designed to take a direct route whilst following existing features, such as

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the ES [EN010168/APP/6.1] detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing

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				employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. The Community Benefit Fund is separate from the Development Consent Order (DCO) process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance. The Applicant is in full agreement with guidance published in May 2025 by the Department for Energy Security & Net Zero (DESNZ)- 'Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure', which sets out that local communities should feel tangible and enduring benefit from their role in creating a low-cost, clean energy system in the UK. Community benefits are already delivered on a voluntary basis around the country, and so the Applicant is

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				confident that this approach is suitable for this Scheme.
LD2_FFD_636	Project description and DCO process	Q4 [overall comments] - I am not against Green Energy and I am not a NIMBY - I would be in support of a Rolls-Royce small modular reactor occupying 10 acres in area E and providing energy locally. I am passionately against this proposal because I believe it is wrong. • The amount of sunlight particularly in winter when energy usage is highest means that the area of countryside that will be destroyed to energy production ratio is poor. • I do not think that it will be green energy when the carbon cost of manufacture, transportation, installation, repair, replacement, recycling is considered. • The energy generated will not be used locally • It is too big • It is on farmland • It will industrialise a very rural area of beautiful countryside • It will negatively impact the local economy – Farm workers, tenant farmers tourism, house prices • It will negatively impact the communities – mental, health, views, access, noise. • Our local MP and our County Council and	No	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy (EN-3), that there is an urgent need for large scale capacity low-carbon energy generation in the UK which includes solar developments such as the Scheme. The location of the Scheme has been chosen through a thorough site selection process which is explained more fully in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] of the Environmental Statement and assessed against relevant planning policy. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of EIA, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and

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		our Parish Councils– all of which are democratically elected by local people to serve the local community have all voted against this proposal. • It is not about green energy. It is about big gains for a small number of international individuals taking advantage of poor policy.		incorporated, where practicable. The design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures.
LD2_FFD_636	Landscape and visual / Ecology and biodiversity / Project description and DCO process	Q5 [comments on indicative masterplan] - Area E is totally unsuitable for such a development. The village of Rodbourne is in a conservation area. It is particularly rural and special. It has particularly wide verges with wild crocus and wild garlic and majestic mature Oak and Plane trees (I cannot cut a tree down in my garden without permission. I had to protect my trees during recent building works); A Listed church and an ancient cross; No curbs, no passing places and no traffic signs. It is totally unsuitable for installation lorries. The fields will be accessed via a Bridleway	No	The Applicant acknowledges the concerns raised and confirms that the potential impacts of the scheme have been assessed throughout the Environmental Statement. Where impacts are identified, appropriate mitigation measures have been proposed. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road

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				condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise. No ancient and/or veteran trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed in order to retain existing arboriculture features as far as practicable. Any unavoidable tree losses as a result of the Scheme will be suitably mitigated for. This is set out in Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]. The Scheme has been designed to retain existing hedgerows and grassland habitats as far as practicable. Some loss of hedgerows will be required to provide new access and infrastructure. Anticipated hedgerow losses represent a small

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				proportion of the existing hedgerow network within the Order Limits, and planting of new hedgerows will far outweigh losses. Proposed new hedgerows are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]. Potential impacts of the Scheme on habitats, protected species and species of conservation concern are assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. With particular reference to Lime Down E, the scheme has been designed to avoid areas of ancient woodland, lowland meadow habitat and mature oak trees, with protective undeveloped buffers implemented to ensure impacts on these important features are avoided. The Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. has assessed the effects of the development on all nearby settlements including Rodbourne.
LD2_FFD_636	Landscape and visual	Q6 [comments on design principles] - With all the will and finance in the world this is all	No	Potential impacts of the Scheme are fully assessed in Environmental Statement

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		theoretical baloney. The impact of this huge industrial development on wildlife, nature, people, environment heritage, farming, recreational access and enjoyment cannot be minimised. Q7 [comments on the assessment of potential effects / Landscape] - How can hedges hide tracking panels the height of a double decker bus? Hedges take a long time to grow and mature as do trees. but no time to rip out and cut down. Your own diagram of the extent of the visual impact shows that it is extensive and way beyond the huge project site.		(ES) Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. This assessment considers all phases of the Scheme, including the construction phase, and describes appropriate measures to avoid or mitigate identified impacts. The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed at Preliminary Environmental Information Report (PEIR) as part of the iterative design process and response to consultation. Panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects.

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				Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. Proposed planting would be of mix of native species designed to improve biodiversity and resilience over speed of growth.
LD2_FFD_636	Ecology and biodiversity	Q8 [comments on the assessment of potential effects / Ecology] - Area E has extensive ancient woodland, wildflower meadows an SSSI and a significant number of mature Oaks. These will be surrounded by industrial infrastructure. I strongly dispute the increase in biodiversity claim.	No	Potential impacts of the Scheme on habitats, protected species and species of conservation concern are assessed in Environmental Statement (ES) Volume 1, Chapter 9:Ecology and Biodiversity [EN010168/APP/6.1]. With particular reference to Lime Down E, the scheme has been designed to avoid areas of ancient woodland, lowland meadow habitat

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		I am particularly concerned about the impact on Hares and Owls.		and mature oak trees, with protective undeveloped buffers implemented to ensure impacts on these important features are avoided.
LD2_FFD_636	Hydrology, flood risk and drainage	Q9 [comments on the assessment of potential effects / Environment] - I think that the hard infrastructure and the runoff from so many panels will increase flood risk. Affecting Malmesbury, Chippenham and even Bath. The local area has a very high water-table. This is also highly relevant to installation and the mess and impaction of the soil. I am also concerned about contamination of the aquifer.	No	The Scheme has been subject to a detailed site-specific Flood Risk Assessment and Drainage Strategy, which form Appendix 11-1 of the Environmental Statement [EN010168/APP/6.3]. These documents confirm that the proposed solar panels will not increase the risk of flooding either on-site or downstream. Solar panels are elevated from the ground on posts, and the ground beneath remains vegetated and permeable. Rainfall continues to infiltrate into the soil or flow as shallow overland flow, much as it does under agricultural baseline conditions. The panels also help shelter the ground, reducing the energy of falling rain and helping to limit erosion. Scientific studies have shown that runoff from solar arrays is typically similar to or less than that from the original agricultural use, due to reduced soil disturbance, permanent vegetation cover and the cessation of ploughing or compaction from heavy farm machinery. In this case, attenuation features and pollution control

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				measures have also been incorporated into the Drainage Strategy for areas with more substantial infrastructure such as battery units and substations. These areas will be drained using lined SuDS systems that include gravel subbases, flow control devices, and shut-off valves to prevent any uncontrolled discharge. The risk of groundwater contamination has also been assessed in the ES [EN010168/APP/6.1]. No hazardous chemicals or agrichemicals will be stored or used across the panelled areas. The only areas with elevated risk—such as the battery units—are located in self-contained drainage zones with impermeable linings and shut-off valves that isolate them from the surrounding environment in the event of an incident. Regarding soil disturbance and compaction, the development is designed to minimise ground disturbance during construction. The construction methodology will favour low-impact installation techniques such as direct piling or ground screws, which require no large-scale excavation. An Outline Soil Resources Management Plan

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				[EN010168/APP/7.15] has been developed to guide all works and reinstate any disturbed soils in accordance with best practice. The Applicant's environmental team are also producing site-specific soil reports to inform appropriate protection and aftercare measures. As a result of the design approach, embedded mitigation measures, and specific controls over water and soil management, the Scheme is not expected to increase flood risk, degrade soil quality, or result in contamination of the underlying aquifer.
LD2_FFD_636	Transport and access	Q10 [comments on the Cable Route Search Corridor] - 50-meter-wide scar for miles and miles. major disruption to so many families and communities and traffic chaos for months, even years. Cost to local economy. Cost to Council. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Transport Extensive congestion, danger, damage to verges, noise, pollution, urbanisation and building of passing places to rural roads.	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP

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				[EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects. For the Stage Two statutory consultation, the Applicant identified and invited feedback on an area of land (the Cable Route Search Corridor) which covered approximately 1,947 ha of land within which the Cable Route Corridor would be sited. Details of the Cable Route Corridor (as refined for DCO application submission) can be found in ES Chapter 2: The Order Limits [EN010168/APP/6.1]. More information regarding selection of the cable route corridor is contained within ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1].
LD2_FFD_636	Noise and vibration	NOICE During installation particularly from piledriving During operation - Hum from panels. Mechanical from tracking panels, Inverters,	No	The noise and vibration impacts from construction are assessed in Section 14.10 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with

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		and fans. This is a monumental environmental change, constant and my mental health concerns are huge.		supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the

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				distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline OEMP [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of determinants of health, with mental health aspects to them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health

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				and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has explored ways to ensure members of impacted communities have access to mental health resources during and following the DCO process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team.
LD2_FFD_636	Community benefits and impact	Q12 [suggestions for on-site community benefits] - This is not an urban park. It is genuine proper countryside with good access and minimal human intervention. The suggestion that the placing of information boards and nature trails would be mitigating is insulting and suggests a total lack of understanding of true countryside. I want	No	The applicant acknowledges the strength of local feeling and the importance of preserving the existing countryside. Proposed enhancements such as nature trails or information boards are optional and not intended as mitigation, but are welcomed as a suggestion for a community benefit associated with the

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		true habitat for my hares, butterfly's, dormice and owls etc etc not an information board. I find the increase in biodiversity claim an insult to my common sense and wonder how you will prove it? But then you wont care or even be involved if it goes ahead. Q13 [suggestions for off-site community benefits] - N/A Q14 [Additional comments] - N/A		scheme. The project includes a detailed Biodiversity Net Gain assessment to ensure that ecological improvements are measurable and monitored over time.
LD2_FFD_645	Climate change and energy need	Q4 [overall comments] - I am conscious of the need for the production of green energy however, I do not think t that solar is necessarily the way forward in the south west of England. Wiltshire has already met its contributory efforts with regards to the production of green energy in relation to all other counties within the UK. I am aware that large solar farms usually produce 15-20% of the energy which they initially have claimed to produce. I am highly sceptical of the energy values which Lime Down claims to ultimately generate. There are numerous opportunities to develop solar energy generation systems in areas which will not have such great environmental detriment, which will	No	The applicant has submitted a Statement of Need [EN010168/APP/7.1] which address these and related comments as part of its application. The Applicant stands by its claims relating to the annual generation potential of the Scheme, as set out in Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1]. The Statement of Need provides evidence to support the urgent and unprecedented need for new low-carbon generation supplies, including large-scale solar generation, and explains that new renewable generation of any scale requires connection to the UK's electricity network, but those connections are scarce. Connection to the existing and available Melksham substation in timeframes which support Government's

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		inevitably be the case with Lime Down. The scale is enormous and the environmental impact in an area of outstanding nature beauty will be significant. The development of solar farms would be better suited to developed areas and particularly to areas where existing infrastructure and environmental damage have already occurred. Such examples would be alongside motorways and major road networks, and rail networks. To develop a solar farm of such enormous proportions in the Wilshire landscape which has a rich farming heritage is not only difficult to support, it simply threatens food production and damages local communities to such a great degree that I could not possibly support its application.		drive to an enduring zero-carbon electricity system is a key benefit of the scheme.
LD2_FFD_645	Other Environmental Matters (Battery Safety) / Site selection and alternatives	The environmental damage to the local villages needs to be carefully considered and certainly any accidents particularly with regards to the battery park have not been carefully weighed up. The battery park is situated far too close to Hullavington, which is a large village of several hundred people which has planning for further development. The environmental impact of a fire at the battery park would have long term far reaching consequences for the village which would be uninhabitable in such an event.	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Storage Safety Management Plan (OBSSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site

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		The distance of the solar farm to the site in Melksham is too great and there is a highly significant impact ecologically and financially in transporting the energy generated at Lime Down, stored in the battery park and then transferred to Melksham (over 20miles), which seems finically and ecologically unnecessary. I believe this in itself would render such a project not financially viable. Surely it would be possible to generate and store electricity closer to Melksham?		and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities, workplaces, transport links, etc.); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community. In selecting the site for the Scheme, the Applicant considered sites within a radius of 20km of the Existing Melksham Substation, which is considered by the Applicant to be a viable radius for a cable connection for a solar project of this scale. More information regarding how the site was selected can be found in Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.
LD2_FFD_645	Site selection and alternatives	Q5 [comments on indicative masterplan] - The site of the battery park is far too close to a large village (Hullavington). The proposed site of Lime Down itself is far too distant from Melksham where the power is fed into the grid. It seems ludicrous to transport energy over such a distance when it could be generated closer to Melksham. There is also the issue of lost energy which will	No	The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Storage Safety Management Plan (OBSSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: To minimise the likelihood of an event. This is an overriding priority

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		undoubtedly occur in its transportation over this distance.		• To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities, workplaces, transport links, etc.); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community. In selecting the site for the Scheme, the Applicant considered sites within a radius of 20km of the Existing Melksham Substation, which is considered by the Applicant to be a viable radius for a cable connection for a solar project of this scale. More information regarding how the site was selected can be found in Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search

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				area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.
LD2_FFD_645	Landscape and visual	Q6 [comments on design principles] - This has been covered in my previous comments.	No	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q7 [comments on the assessment of potential effects / Landscape] - I believe that a project of the size proposed by Island Green Power is completely out of keeping with the Wiltshire countryside. It's a construction in an area of outstanding natural beauty is ill considered and impractical. The proposal for solar panels at 4.5 meters high would be a scare on the landscape. I have no confidence that there would be any mechanism for it to be decommissioned at the end of the terms of the contract.		Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The Scheme is located outside of the Cotswold National Landscape. However, it has been agreed that parts of Site A, B and C are within the setting of the Cotswolds National Landscape where panels have been set back by one field. These fields are proposed for positive enhancement. Refer to ES Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2].
LD2_FFD_645	Ecology and biodiversity / Soils and agriculture	Q8 [comments on the assessment of potential effects / Ecology] - I am aware that small solar farms have contributed to biodiversity however, I do not believe that a site on the scale proposed by Lime Down will have any positive impacts on ecosystems and biodiversity. I think that soil quality will be very adversely effected, rendering the land significantly effected with regards to food production and agricultures in the future should the site every be decommissioned.	No	By way of quantifying the Scheme's contributions to biodiversity, a Biodiversity Net Gain assessment and completed Metric has been submitted with the Development Consent Order (DCO) application in DCO Volume 7 Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [EN010168/APP/7.9]. Soil: Long-term conversion of arable land to grassland leads to benefits in soil health and quality. The lack of disturbance enables such action as accumulation of

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				carbon and organic matter, and establishment of more stable soil structures. Benefits are set out in Environmental Statement (ES) Chapter 17: Soil and Agriculture [EN010168/APP/6.1]
LD2_FFD_645	Climate change and energy need / Project description and DCO process	Q9 [comments on the assessment of potential effects / Environment] - I believe that the generation of energy within Lime Down on such a scale will have significant negative effects on the environment. I believe that flooding may well be an issue, water courses will be effected and there will be a significant impact with regards to noise pollution when it is operational. In addition the environmental impact of a development on such a scale will have enormous environmental impacts on the surrounding villages and infrastructure during the construction process. The road networks are simply not able to sustain and maintain the enormity of the proposed project.	No	The Scheme has been subject to a comprehensive Environmental Impact Assessment (EIA), the findings of which are reported in the Environmental Statement (ES) [EN010168/APP/6.1]. This includes dedicated assessments of hydrology, flood risk and drainage (ES Chapter 11) [EN010168/APP/6.1], transport and access (ES Chapter 13) [EN010168/APP/6.1], and noise and vibration (ES Chapter 14) [EN010168/APP/6.1]. The Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3] confirms that the Scheme will not increase flood risk, with runoff controlled to greenfield rates and appropriate Sustainable Drainage Systems (SuDS) embedded in the design. Watercourses including Gauze Brook and Gabriel's Well have been modelled and assessed, with no significant adverse effects identified. Construction-phase impacts, including those relating to noise and traffic, are addressed in the Outline Construction

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Environmental Management Plan (CEMP) [EN010168/APP/7.12] and the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22]. These documents secure mitigation such as designated haul routes, traffic management at sensitive junctions, limits on construction hours, and controls on noise and dust generation. Flood risk and watercourse effects have therefore been fully assessed and mitigated. Noise, transport and other environmental matters are considered in detail within their respective ES chapters, which conclude that with embedded measures in place the Scheme will not result in significant adverse effects on local communities. The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Vibration [EN010168/APP/6.1] and committed to in the Outline CEMP [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan (OEMP)[EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects. The capacity of local roads/infrastructure to accommodate construction vehicles is assessed in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], which concludes there are no significant adverse impacts. ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] also identifies specific highway improvement areas where traffic management or passing bays may be required on narrower sections of the construction routes. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the

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				construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the DCO. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.
LD2_FFD_645	Ecology and biodiversity	Q10 [comments on the Cable Route Search Corridor] - From a personal perspective, we have livestock at [REDACTED] We certainly would not welcome an underground cable route on our land. If this were to occur, I would like to know how our livestock will have sufficient grazing to enable them to live on our property.	No	On completion of works to bury cables, overground habitat will be reinstated to pre-existing habitat with animals able to continue to graze.
LD2_FFD_645	Project description and DCO	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Covered	No	The operational life of the Scheme is 60 years, with decommissioning to commence 60 years after final commissioning

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
	process / Community benefits and impact	previously, however I would like your comments regarding decommissioning as it is my understanding that in previous solar farms this has been an issue and cannot be guaranteed. Q12 [suggestions for on-site community benefits] - I cannot see any significant community benefit that such a project as Lime Down will deliver. The only benefit that might be achieved is if Island Green Power guaranteed free electricity to the communities which will be significantly impacted by the solar farm. Q13 [suggestions for off-site community benefits] - N/A Q14 [Additional comments] - N/A		(currently anticipated to be approximately 2029 to 2089). This will be secured in the Outline Decommissioning Strategy submitted as part of the DCO Application. At the end of the 60 years, the Scheme will be decommissioned and returned back to its former condition and land use. The Applicant will provide a community benefits package as part of the Scheme. Potential on-site and off-site initiatives that could be developed over the lifespan of the Scheme are currently being investigated.
LD2_FFD_663	Consultation and engagement	Q4 [overall comments] - It is far too big and in an unsuitable area. The local lanes are far too small to cope with the amount construction period and ongoing maintenance for both the panels and cable route. This Battery storage is unsafe and high-risk for people living near. It's divisive and mental health damaging for the local community. - The consultation has been misleading. You have had years and months to prepare. Local people get a few weeks to	No	Safety risks from substations and BESS have been assessed within Environmental Statement (ES) Volume 1, Chapter 20: Other Environmental Matters, Section 20.7 Major Accidents and Disasters [EN010168/APP/6.1]. The chapter assesses the risk from 'Building Failure, Fire and Explosions' as not significant. This is due to embedded mitigation such as built in safety features in the BESS Area (i.e., cooling systems, non-

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		wade through, try and digest in excess of 4,000 documents and respond to something that could be a life changing for them. The documents you produce are not giving the public a true picture of what this scheme will do to the area and the chaos and misery and disruption it will cause. Misleading information, one example. Display boards at consultation meetings and your Lime Down Website is covered in photos of sheep grazing and amongst - average sized not 4.5/3.5-meter-high panels and yet quote from Wilts Council cabinet meeting minutes from 4th March 'There is a specific issue regarding grazing on the site. The assessment from the developer is that it is assumed there would be no grazing during the operation of the solar park'. My understanding was sheep grazing had been a 'selling point' for IGP. The consultation forms and this online form is designed to put people off responding as it's so long and intimidating, I do not believe you can even save a copy! The whole process is COMPLETELY developer bias. The possible end decision being down to one bias individual is an insult to democracy in this country.		combustible BESS enclosures, high levels of thermal insulation to protect against fire propagation, fire and gas detection system, explosion protection systems, suppression systems, emergency stop functions and isolation monitoring) and the implementation of the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. The Outline BSMP has been developed using the guidance provided by Dorset and Wiltshire Fire and Rescue Service, which fully incorporates the recommendations of the National Fire Chiefs Council (NFCC) and NFPA 855, Standard for the Installation of Stationary Energy Storage Systems. Toxic gases from any fires are also assessed within ES Volume 1, Chapter 15: Air Quality and ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7 Major Accidents and Disasters [EN010168/APP/6.1]. An assessment of how these fumes could impact all sensitive receptors within a 1km radius of the BESS area which includes residential properties and species is provided in ES Volume 1, Chapter 15: Air Quality [EN010168/ APP/6.1] which concludes that no significant off site

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				impacts are predicted should a fire event occur. Should a fire event occur then the recommendations set out in the Outline BSMP [EN010168/APP/7.21] (i.e., staying inside and shutting windows) will further reduce impact to residents. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of determinants of health, with mental health aspects to them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has

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				explored ways to ensure members of impacted communities have access to mental health resources during and following the Development Consent Order (DCO) process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team. The statutory consultation period exceeded the statutorily required period of 28 days, taking place for 49 days from 29 January to 19 March 2025. Along with the PEIR and NTS being made available to local communities, the Applicant also published a Project Information Booklet (to provide information on the planning process, an overview of the Scheme and what was being consulted on, how to take part and next steps) and a Document Navigation Booklet (to provide a guide to the consultation documents including community consultation literature and technical documents) to further facilitate participation in the consultation and readership of the materials.

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				Community consultation literature included clear references and signposts to the PEIR for more detailed, technical information regarding the Scheme. The Project Information Booklet spoke to the height and size for panels and other key infrastructure as was being assessed in the PEIR. Where photos were used in the Project Information Booklet, a short description was provided where relevant to clarify where these were illustrative models or example imagery of components from similar projects. The Applicant provided multiple means of responding to the statutory consultation, including freeform letters via Freepost and emails via the Scheme-dedicated email address. The Applicant has recorded all feedback received in response to the statutory consultation and in the Consultation Report submitted with the DCO will set out the key themes raised in the feedback and consultation responses received, along with a response setting out how the Applicant has had regard to those comments relevant to the Scheme and how these have influenced the proposals. The Applicant provided copies of feedback to the relevant stakeholders upon request.

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				The applicant notes that while sheep grazing is a recognised form of land use alongside solar infrastructure, it is not the primary objective for land use within the Scheme, particularly given that much of the land within the solar PV areas is not currently used for sheep grazing. However, where feasible, and where it aligns with proposed mitigation and biodiversity enhancement measures, sheep grazing remains a suitable and compatible secondary use beneath and around the solar arrays.
LD2_FFD_663	Landscape and visual / Ecology and biodiversity	Q5 [comments on indicative masterplan] - It is all hideous Q6 [comments on design principles] -Too many panels too high. Will take years for hedges to screen. Q7 [comments on the assessment of potential effects / Landscape] - The area will be ruined. This scheme will be visible from miles and miles away particularly due to the land contours. It will never be screened. People walking footpaths, sitting on field edges to take in views cyclist and horse riders will be surrounded with panels, sub stations, inverters, huge battery storage. and		The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . Information on baseline (existing) ecological features have been recorded through a suite of comprehensive surveys and studies and are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. It is anticipated that the Scheme will deliver

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		associated noise from it all. Q8 [comments on the assessment of potential effects / Ecology] - We already have plenty of existing Ecology and biodiversity Q9 [comments on the assessment of potential effects / Environment] - Effects on wildlife, Loss of habitats and grazing areas for deer, brown hare etc. High deer fencing stops natural wandering. what mitigation are you proposing? Very little signs of any animal life on existing scheme at Hullavington and no signs of any particular enhanced environmental mixes there. What are you proposing is the scheme happens		beneficial effects on a range of existing ecological features as set out in within this chapter. Fencing around solar panels will be permeable to all wildlife except deer, meaning most wildlife will be able to freely access habitat within fenced areas without the need for wildlife gates. Wide buffers will be retained around the peripheries of the Solar PV Sites which will allow wildlife including deer to move between favoured habitats. Ecological mitigation and enhancement measures are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], and are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1] The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction

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				activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental

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				Management Plan (OEMP) [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects.
LD2_FFD_663		Q10 [comments on the Cable Route Search Corridor] - Absolutely do not wish my land to be used for any of this scheme. I was offered the opportunity to be involved years ago which I dismissed immediately. I have far too much consideration for my local community. I have a very large dairy herd which I am obliged to graze for a least 180 days per year to comply with my milk contract. Under no circumstances can I afford to be thrown off my contract for being		The Applicant acknowledges the concerns regarding the cable route and its potential impact on grazing land, particularly in relation to compliance with dairy contracts. Further information is included within Environmental Statement (ES) Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The final route will be informed by detailed surveys and ongoing landowner engagement. A full consultation on the cable corridor has

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		unable to comply. I cannot afford to lose ANY grazing at all on my land. There needs to be far more accurate plans made available to see where the route would go if permission granted. The entire cable route needs a full consultation. you have only covered the panel area and Whitley as the BESS area was being considered there. People need to be aware how much disruption this will cause to entire route - it should be going along the A350 not ruining yet more productive farmland! Will you be mending or paying for all the new field drainage that will be required as cable trench destroys land drains? What about stock fencing during construction?		been undertaken as part of the statutory process. Issues such as disruption to field drainage, fencing, and impacts on livestock will be addressed through mitigation measures and individual land agreements. The applicant has already considered, and is continuing to consider, feedback on alternative routing options, including the use of corridors such as the A350. The primary use of the A350 for cable routing was previously discounted at the PEIR stage of the Scheme due to feedback from the local highway authority.
LD2_FFD_663	Soils and agriculture / Decommissioning and construction	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - The land will effectively be rendered useless after the project. I have spoken with a number of farmers who have small solar install. They have confirmed that the land will be no good for any form of proper farming due to the amounts of steel and concrete and general rubbish that was left in the ground during construction. quote "whatever the developers may tell you to the contrary" You have not decommissioned sites before. How do you propose to reinstate the land and dispose of all the imported chinses		The potential effects of construction and maintenance activities on soils will be minimised through adherence to measures contained within a Soil Resources Management Plan. An Outline Soil Resources Management Plan [EN010168/APP/7.15] has been submitted as part of the Development Consent Order (DCO) Application. Construction measures and control points will be set out in the Construction Environmental Management Plan (CEMP).

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		panels, transformers. batteries, substations etc? What assurance has anyone got that the land will be reinstated? What indemnities will be in place. will they be attached to land titles to guarantee the owners will reinstate?		When the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting piles, cabling, inverters, transformers, switchgear, BESS and substations would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. Post-decommissioning, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the

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				precise timing to be determined by the contractor(s) and communicated to Wiltshire Council in accordance with the Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] .
LD2_FFD_663	Community benefits and impact / Site selection and alternatives	Q12 [suggestions for on-site community benefits] - There is no community benefit that could even begin to compensate for this mass destruction. It's blood money Q13 [suggestions for off-site community benefits] - There are none - the only benefit will be hearing the scheme is shelved Q14 [Additional comments] - Solar only has place on Roofs and brownfield. Or maybe try applying for Richmond park see how the urban people become apparent 'Nimby's' - there is no benefit for this scheme. It's TOO big. The mental health implications for local people if this ever proceeds does not bear thinking about.		The applicant remains committed to voluntarily providing both on-site and off-site benefits. The Applicant welcomes ongoing discussions regarding the potential structure and delivery of any community benefit funding, should the Scheme receive consent. This will be independently managed and shaped through further engagement, with the aim of supporting local priorities should the Scheme proceed. More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. As part of the assessment, the Applicant has considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites. Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes, and may also include other small scale solar such as walls or fences, will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in 2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that “Solar energy is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy” (p15). The Roadmap talks to the benefits of increasing small scale /

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because “Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale” and “Speed of deployment is also a huge benefit of solar” for both ground mounted and rooftop schemes (p15). This “makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets.” The Roadmap includes illustrative deployment scenarios which “show that reaching the Clean Power 2030 range is achievable, but will require significant action” (p16). Large-scale solar represents 60-65% of the UK’s installed solar capacity by 2030 in the Roadmap’s illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range through the illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in deployment of these schemes must be

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				made up for by other technologies, including from large scale schemes. These publications make it clear, and the Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme
LD2_FFD_670	Transport and access / Project description and DCO process	Q4 [overall comments] - As a landowner with both land and property immediately adjacent to the primary access route to locations A, B & C I have the following key issues to raise regarding vehicle routing access and Ecology. Q5 [comments on indicative masterplan] - The primary access route requires the transport to pass three blind bends immediately to the north of the crossroads at Grittleton. These bends have two issues. Firstly, there is insufficient road width for a lorry and a car to pass each other on the apex of the bend and on the third blind bend for a further 70-100 metres at the styart of	No	In line with the National Planning Practice Guidance (NPPG) for Transport Assessments, only recorded personal injury collisions from the most recent five year period are considered in the assessment. According to records, there have been no reported personal injury collisions on Alderton Road, in the five year period up to 2023 (2024 data is unavailable at this point). It is unclear why the accidents observed by the respondent have not been reported. Detail on impacts and accident analysis can be found in Environmental Statement (ES) Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3], and

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		the Fosse Road. Secondly, there have been 8 bad accidents immediately on the bend outside the entrance to our property. Records will only show two in the past few years but these are only the reported accidents. We have visual images of the three most recent accidents in the past. The bend is an accident blackspot which is why Wiltshire Council have , at Grittleton Councils request, now put in 2024 three chevron signs indicating a severe bend to drivers in both directions. We have attended over 7 accidents in the past 12 years whilst we have been at home and a further two incidents where vehicles have driven into the dry stone wall fronting our property. The most recent accidents have been on the the following dates - VW overturned reg GN16PVF photographic record taken on 22nd November 2022 at 15:09 and the latest accident being (post Chevron installation) after Christmas 2024 which resulted in both vehicles being a total write-off. Q6 [comments on design principles] - Sufficient distance from major roads to start of installation to minimise visibility of the installation from a 4 wheel drive vehicle, the vehicle of choice around here. I am not going to major on this as the road issues		Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1 . The Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] contains measures to manage construction traffic such as a booking process for entrance and exits to avoid conflicts and restricted delivery hours so deliveries occur on the local highway network outside of the typical network peak hours. It is acknowledged that Alderton Road is narrow in places, and contains some bends. Therefore, it has been designated as a 'highway improvement area', where a combination of road improvements and traffic management will ensure the safe passage of construction vehicles associated with the Scheme.

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		and bat colonies are the key matters in my opinion.		
LD2_FFD_670	Ecology and biodiversity	Q7 [comments on the assessment of potential effects / Landscape] - Not to be visible from the roads. Q8 [comments on the assessment of potential effects / Ecology] - We have on 18th March 2025 had a provisional Ecology report undertaken at [REDACTED]. This confirms a major nesting colony of bats at the property. [REDACTED] [REDACTED] [REDACTED] [REDACTED] The initial assessment is 50 - 100 mating pairs, two bat species and 1-3 roosting and potential 3 nesting colonies across 3 attic spaces. This is a major Ecology issue. Further reports are to be undertaken from May to August 2025 by the Ecologists we have employed via our Architects. Q9 [comments on the assessment of potential effects / Environment] - We have woodpeckers, bats, two types of deer, swifts etc all on our land and using the woodland to the North West and South East of us be taken into consideration as to the impact of a high density throughput of lorries on the	No	A detailed assessment of impacts on protected species and species of conservation concern is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , which describes how the Scheme can be expected to deliver a benefits for a number of ecological features.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		road. Also, there is major water influx to the road leading to significant road deterioration over the camber of the bend with the major storm drain not being maintained by Wiltshire Council.		
LD2_FFD_670	Project description and DCO process	Q10 [comments on the Cable Route Search Corridor] - I have none apart from requesting estimates as to the power loss from exiting the BESS to entering the substation. Also, how much loss is there per 100 metres and per Klm? Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - What is the minimum and maximum construction duration period? I have heard twoi myears but having project managed significant national infrastructure projects of a tec hnical nature I find 2 years difficult to believe is feasible. Socndly what is the budgeted per month cost of running the the build and what (as a % of the total project cost\) has been provisioned for contingencies. Indeed, I wopuld be interested in seeing the summary project costs and payback calculations, in tens of millions of pounds will suffice for my evaluation purposes.	No	Subject to being granted development consent and following a final investment decision, the earliest construction could start is in 2027. Construction of the Solar PV Sites and Cable Route Corridor is likely start in tandem. The installation of cable within the Cable Route Corridor would require up to approximately 18 months, and the construction of the Solar PV Sites would require an estimated 24 months and the operation and maintenance phase anticipated to commence in 2029. The construction phase could be of longer duration (e.g. if works within the Solar PV Sites and Cable Route Corridor are undertaken sequentially rather than simultaneously), however, these timings have been used as a reasonable worst-case assumption for the technical assessments, for example to present the maximum predicted daily traffic flows and the amount of construction activity that could occur at any given time.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_670	Community benefits and impact	Q12 [suggestions for on-site community benefits] - The number one issue for me and those of us to the western edge of the development is communications infrastructure. We have been missed off the fibre connections to the main village. The installation of an additional mast for the MNO's to place 2G six sector and 5G equipment on would be an vast improvement to Broadband and mobile reception both uplink and downlink. Q13 [suggestions for off-site community benefits] - Funding to help with the construction of a new GP practise at Sherston, to replace the old facilities. Sherston has a "New" school. AS the only village in the South Cotswolds with all facilities - Village Store, Post Office, Hairdressers, Wine Shop, Estate Agents, Pub, Indian Restaurant etc., currently one does not need to leave the village. Q14 [Additional comments] -Logistics and Access routes need to be well thought out as does the landscape aspects. I do NOT need more space to walk our dogs! I have access to six acres and 25 acres of woodland ten feet from my back door.	No	The applicant notes the comments regarding community benefits linked to communication network provision and confirms that, while they would consider providing funding support, the delivery of infrastructure and the planning applications required for network improvements fall outside of the applicant's control The applicant remains committed to voluntarily providing both on-site and off-site benefits. The Applicant welcomes ongoing discussions regarding the potential structure and delivery of any community benefit funding, should the Schemereceive consent. This will be independently managed and shaped through further engagement, with the aim of supporting local priorities should the Scheme proceed.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_747	Socioeconomics, tourism, recreation and health	[other] - Economic impact on local tenant farmers and the village of Rodbourne.	No	An assessment of likely agricultural job losses as a direct result of the Scheme and as a result of supplier and downstream industry losses, has been assessed in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supported by specific assessment of agricultural circumstances in ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] . Other economic impacts on the village of Rodbourne (such as tourism-dependent businesses) are considered as part of the assessment of economic impacts across the wider Study Area.
LD2_FFD_747	Site selection and alternatives (Design Principles)	Q4 [overall comments] - It is proposed to place this huge solar farm adjacent to an area of outstanding natural beauty. There are numerous archaeological assets and a SSSI in its midst. It meets only ONE of the criteria you set yourselves for locating a farm - its available. This is not a good enough test.	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3] . The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. The entirety of the Cotswolds National Landscape was excluded from the search area for sites. Further, the Design

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Approach Document [EN010168/APP/7.3] summarises how the Applicant has considered the proximity of the Cotswolds National Landscape in its design and the design evolution of the Scheme, in accordance with its design principles and planning policy, including measures to minimise harm to the landscape and reduce the visual effects of the Scheme. The design evolution is also detailed in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1], including the removal of solar panels in fields closest to the Cotswolds National Landscape. The extensive range of proposed mitigation and enhancement measures to reduce visual effects of the Scheme are set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].
LD2_FFD_747	Project description and DCO process.	Q5 [comments on indicative masterplan] - The plans you issue are misleading and false. Q6 [comments on design principles] - im sure the design principles fall within a guide - but they fail to account for the local area with all its natual beauty and landscape. Q7 [comments on the assessment of	No	The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed in the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		potential effects / Landscape] - Its so huge that even your assessment demonstartes it will be seen from up to 20 miles away. Q8 [comments on the assessment of potential effects / Ecology] - N/A Q9 [comments on the assessment of potential effects / Environment] - N/A		Preliminary Environmental Information Report (PEIR) as part of the iterative design process, in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this reduction in the Scheme's red line boundary, panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The design will incorporate minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland and hedgerows, public rights of way and watercourses.
LD2_FFD_747	Consultation and engagement	Q10 [comments on the Cable Route Search Corridor] - You fail to mention or ask any questions about the BESS, This is a cynicle mistake that really should be included in the consultation.	No	The BESS was included as a component of the Scheme that the Applicant sought feedback on during Stage Two statutory consultation (January – March 2025). Information on the BESS and its proposed locations was provided in the Preliminary Environmental Information Report (PEIR), Project Information Booklet, and on the dedicated Scheme website. Copies of Stage Two statutory consultation materials are provided in Appendix F: Statutory Consultation under section 47 of the Planning Act 2008 of the Consultation Report [EN010168/APP/5.2]. The Stage Two statutory consultation Feedback Form included a question inviting specific feedback on the proposed locations of the Scheme infrastructure and equipment, including the BESS. A copy of the Stage Two statutory consultation Feedback Form is provided in Appendix F: Statutory Consultation under section 47 of the Planning Act 2008 of the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Consultation Report [EN010168/APP/5.2].
LD2_FFD_747	Decommissioning and construction	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - There are no measures enshrined by you, or financed by you to decommission. the installation will involve quantities of concrete that the local area has never been exposed to.	No	As stated in Environmental Statement (ES) Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] all land will be returned to its original use and condition as far as is practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids, or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				quality, with some Subgrade 3a at the BESS Area. A Decommissioning Strategy is secured by Requirement 21 of the Development Consent Order (DCO) and will need to be approved by the local planning authority prior to decommissioning. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and be applied in conjunction with the SRMP in order to promote successful reinstatement. An Outline Decommissioning Strategy (DS) [EN010168/APP/7.14] has been submitted as part of the Development Consent Order (DCO) Application. In terms of the guarantees that are in place to ensure decommissioning happens, the Applicant is seeking a time limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 21 of the DCO. A Draft DCO [EN010168/APP/3.1] has been submitted as part of the Application.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_747	Community benefits and impact	Q12 [suggestions for on-site community benefits] - The fiels margin to the East of fields E33 and E34 is used by legal fox hunting and the followers to access the bridge in the south eastern corner of E34. This needs to be maintained please. Q13 [suggestions for off-site community benefits] - N/A Q14 [Additional comments] - Please see the document on area E i have sent on email.	No	The eastern boundary of fields E33 and E34 (understood as a former drover's trail between Seagry Wood and Cleeve House) is currently a permissive access route only. This is anticipated to be informally retained as available for permissive access throughout the lifetime of the Scheme. Trail hunting or drag hunting is only to be permitted on this route subject to the discretion of the Scheme operator.
LD2_FFD_781	Site selection and alternatives	Q4 [overall comments] - The impact of such a huge solar farm is completely wrong for a rural area and specifically so on the quality farm land of the proposed site. In the current climate the UK must begin to rely less on food imports and retain its arable land. Solar farms of this scale should be sited on industrial land, by motorways and on rooftops - especially on new build and industrial buildings. It is also important to ensure that the character and beauty of the area is not endangered by what will inevitably be an industrial eyesore and specifically one that would also increase flood and other contamination risks.	No	Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK</i>

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Disruption during the construction phase will severely impact on local residents; not only creating noise and pollution but also endangering pedestrians and other road users.		<i>Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Further assessment of food security and soil quality can be found in Environmental Statement (ES) Chapter 16: Socio Economic, Tourism and Recreation [EN010168/APP/6.1] and Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. More information regarding how the site was selected can be found in ES Volume 1, Chapter 4: Alternatives and Design

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. Solar farms are temporary structures and unlike most built development and other renewable energy proposals (such as energy from waste plants) they do not constitute significant permanent development resulting in the loss of agricultural land. Planning policy recognises that solar projects at the scale of the Scheme are likely to use some agricultural land and requires applicants to explain their choice of site, with a preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land (paragraph 2.10.31 of NPS EN-3). In accordance with planning policy, the Applicant has sought to minimise the use of best and most versatile (BMV) agricultural land when selecting the site for the Scheme. As set out in the Site Selection Assessment Report, the Applicant adopted a staged approach in its site selection assessment and initially assessed only non-BMV agricultural land when looking for suitable sites. Due to

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				various constraints, none of the initial potential development areas identified were suitable for the Scheme, and therefore the Applicant widened its search parameters to consider grade 3 agricultural land and some areas of grade 2 land where identified by land agents. On that basis, the site selection for the Scheme is in line with national planning policy regarding use of agricultural land. Brownfield Sites have been considered and are listed in Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. In summary, the Applicant considered the brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites.
LD2_FFD_809	Landscape and visual / Transport and access	Q4 [overall comments] - <i>The height of the proposed panels will have a great impact on the view from my property. It will feel like an industrial site as the proposed area for the panels will surround my property with the possibility of panel glare and be impossible to screen.</i>	Yes	Following Preliminary Environmental Information Report (PEIR) and input from technical disciplines the scheme has undergone various design revisions including the removal of the eastern side of C15.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		This will also cause a fall in value of the property with the panels being so close. The battery storage will also be colossal.		
LD2_FFD_809	Socioeconomics, tourism, recreation and health	Research has shown that:- 'Window views are closely related to environmental quality and influence health and well being'(published online2024 Architecural planning and design Xue Mang & Mohan Wang) As a result of the COVID pandemic a scoping review was performed re:- Housing Conditions on the effect of physical and mental health outcomes. It was found that there were negative effects on all aspects with poor quality views from windows.(National Library of Medicine 22)	Yes	The Applicant confirms the easternmost section of field C15 has been removed from the Solar PV Array to increase the separation distance between the property and onsite infrastructure. The Applicant has assessed the health impacts associated with changes to the aspect and character of the landscape under the heading "community identity" in Environmental Statement (ES) Volume 1 Chapter 18: Human Health [EN010168/APP/6.1]. In response to the referenced articles, the Scheme is likely to become a feature within the viewscape of windows from the property but will not significantly change the type of view (predominantly open with natural features such as hedgerows and trees) with the solar infrastructure being located within that setting. The 2024 Mang & Wang study found that studies of elements and features within a view were inconsistent in their conclusions. Therefore, from within the property, the type of view is not likely to significantly change and therefore is

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				unlikely to have a significant impact on health and wellbeing.
LD2_FFD_809	Soils and agriculture	I have concerns over the loss of food production particularly as we are currently living in a fragile world. The cleaning of the panels and eventual degradation could well pollute the soil for the future.	Yes	Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				An assessment on Soils is included within Environmental Statement (ES) Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The potential effects of construction and maintenance activities on soils will be minimised through adherence to measures contained within a Soil Resources Management Plan. An Outline Soil Resources Management Plan [EN010168/APP/7.15] has been submitted as part of the Development Consent Order (DCO) Application. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
LD2_FFD_809	Transport and access	A further concern is the impact the construction will have on the single track roads.	Yes	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects.
LD2_FFD_809	Landscape and visual	Q7 [comments on the assessment of potential effects / Landscape] - As mentioned earlier, the screening of the panels will take many years as the panels are so large	Yes	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .
LD2_FFD_809	Project description and DCO process	Q10 [comments on the Cable Route Search Corridor] - At the consultation meeting, no clear answers were given to the route of the cables which I given to understand could involve 50 metre tracks.	Yes	The Cable Route Corridor allows for necessary spatial flexibility in the routing of the Grid Connection Cables. The construction working area for installation of the Grid Connection Cables is anticipated to be a 25 m wide corridor. This may be widened in places to accommodate required operations (such as the crossing of watercourses, roads, utilities etc.) and narrowed in others, for example to

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				minimise removal of hedgerows. The working width includes the trench, soil, and spoil storage, working area and haul road with passing places where required. As is typical for cable installation projects, the haul road would be up to a maximum of 7 m wide and would run directly on the subsoil surface with temporary track matting used where required. Where passing places are incorporated into the haul road these will be up to 12 m wide.
LD2_FFD_813	Project description and DCO process / Landscape and visual / Soils and agriculture	Q4 [overall comments] - Devastating for every aspect of the area Q5 [comments on indicative masterplan] - As already stated--all of this is devastating for the entire community Q7 [comments on the assessment of potential effects / Landscape] - It would take many years to even grow a hedge, and what about current ancient footpaths? Would it be rather like a concentration camp with fences and cameras etc? Views would in effect be eradicated and indeed mental health would suffer inevitably. Q8 [comments on the assessment of	No	Comment noted. Full details of the mitigation measures are included in in the Environmental Statement (ES) [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and shown in ES Volume 2: LEMP [EN010168/APP/6.2]

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		potential effects / Ecology] - As before and there is so much wildlife which of course would be affected detrimentally. Q9 [comments on the assessment of potential effects / Environment] - As already stated--. Q10 [comments on the Cable Route Search Corridor] - At this stage inevitable damage to the soil structure over a considerable area would be incurred. [However better than pylons.]		
LD2_FFD_813	Climate change and energy need	Q14 [Additional comments] - Considering we have so relatively little sun will it really affect the 1% we contribute in the UK to the global climate condition? Also will it actually provide electricity locally at reduced cost ? We are led to understand that bills will not decrease but increase . Eventually will the main investors pullout and asset strip*the whole project sell it to overseas buyers and the tax payer and meanwhile the actual land would be rendered useless to return to agriculture? Probably none of us would be alive to see. [*not unknown.]	No	The Applicant has submitted a Statement of Need [EN010168/APP/7.1] which addresses these points and others in relation to the UK's urgent and unprecedented requirement for new capacities of low-carbon generation. Climate Change is a global problem, requiring a global solution. It is government's view that the UK's electricity supply in 2050 will largely consist of wind and solar generation because of the decarbonisation, security of supply and affordability benefits these technologies bring forwards.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_817	Project description and DCO process	Q4 [overall comments] - 1. Construction Timeline and Implementation Uncertainty IGP has not provided sufficient evidence to support its claim that construction will take only two years. Given that IGP is not necessarily implementing the construction process itself, how can any firm guarantee timelines with certainty? What prior experience does IGP have in delivering projects of this scale within such a timeframe? Without a proven track record, these claims lack credibility. Throughout the process IGP have gone out of their way to assure residents they are considering constructing the site. This was found to be untrue when IGP temp staff were questioned at the meetings in Luckington and Malmesbury. 2. Transparency of Financial Contributions IGP must clarify whether it has made any financial contributions, incentives, or agreements with Wiltshire trusts, funds, or individuals. If such contributions have been made, they must be disclosed to ensure public transparency and trust in the decision-making process.	No	The Applicant notes the comment on construction period and confirms that further details regarding timelines can be found in the Outline Construction Traffic Management Plan (CTMP) which has been prepared and is available in Development Consent Order (DCO) Volume 7 [EN010168/APP/7.22]. The Applicant confirms that, if consent is granted, they have the capability to build, own, and operate the Scheme The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the Schemewill remain bound by the legally enforceable requirements of the DCO. These obligations apply to the development itself, and not just to those of the original Applicant.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		[...] 4. Lack of Confidence in Management Capabilities It is concerning that IGP's entire management team was replaced at the outset of the project following a poorly executed first consultation. How can stakeholders have confidence in the company's ability to manage a project of this magnitude when its leadership has already demonstrated instability? Assembling a random mix of temp staff to enable IGP to then flip the project to a buyer unknown to impacted residents is an abuse of the due process. [...] 8. History of Broken Promises and Misinformation At a meeting on May 9th at Ladyswood, IGP made the following commitments: • Offering local landowners the opportunity to withdraw from the project – a promise that was later revoked.		

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		- Investigating concerns over legal representation being blocked – an issue that remains unaddressed. - Sharing survey data with stakeholders – a commitment that was not honored. These instances of unfulfilled promises suggest a pattern of unreliable communication, further undermining trust in IGP's ability to deliver this project responsibly. Conclusion Given the lack of transparency, failure to consider alternative sites, potential negative economic impact, safety concerns, and history of mismanagement, I strongly oppose the Lime Down Solar Park development. I urge planners to reject this proposal in favor of a more thoroughly assessed and community-driven approach to renewable energy development.		
LD2_FFD_817	Site selection and alternatives	3. Failure to Assess Alternative Sites The consultation process has not adequately considered alternative locations. Has IGP analyzed the potential for large-scale solar installations on warehouse	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		rooftops, as recommended in the UK Warehousing Association (UKWA) 2022 report? Additionally, why were sites near existing infrastructure, such as railway lines and motorways, not prioritized? The failure to explore these alternatives suggests a development driven by financial incentives rather than the best interests of the region. This was highlighted in the Wiltshire CC meeting which IGP failed to attend.		[EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report concludes

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				that the Solar PV Sites, on balance, offer the most suitable location for the Scheme. As part of the Site Selection Assessment Report [EN010168/APP/6.3], the Applicant has considered brownfield sites listed on the local authorities' Brownfield Land Registers and available rooftops, but neither of these options was viable to accommodate the Scheme due to lack of availability, site size and associated inefficiencies involved in connecting multiple small sites.
LD2_FFD_817	Socioeconomics, tourism, recreation and health	5. Negative Impact on Local Jobs and Businesses Has IGP conducted a net economic impact survey, and if so, why have local businesses not been consulted? Without a full economic impact assessment that includes input from affected businesses, IGP cannot claim that this project benefits the local economy. Furthermore, how much financial gain is IGP expecting from this development, and will this information be disclosed? Transparency in financial matters is critical to gaining public trust. On repeated occasions the questions around contingency funds to disband the site have been avoided by IGP staff. They just had no idea.	No	The Applicant has assessed the likely significant effects on agricultural businesses, and tourism-dependent businesses likely to be affected by the Scheme in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. Businesses as local stakeholders have been given the opportunity to take part in consultation events and feedback, and have therefore been responded to where representations have been made. The Scheme also includes mitigation measures in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] to ensure disruption to local businesses and residents is minimised during construction.
LD2_FFD_817	Other Environmental Matters (Battery Safety)	6. Safety Concerns Regarding Battery Storage There is growing concern about the safety of battery storage sites, particularly given case studies from the U.S. that highlight serious fire risks. Has IGP consulted fire safety experts, including the local fire brigade, on the risks associated with lithium-ion battery storage? The lack of publicly available risk assessments raises significant safety concerns.	No	The Applicant notes this comment, and is fully consulting with Dorset & Wiltshire FRS who are a Statutory Consultee to the DCO planning process. The key safety objectives of the indicative site design planning, Outline Battery Storage Safety Management Plan (OBSSMP) [EN010168/APP/7.21] and Plume Study (Fire emissions modelling) that will be submitted for the Scheme are to: • To minimise the likelihood of an event. This is an overriding priority; • To minimise the consequences should an event occur; • To restrict any event to the BESS site and minimise any impact on the surrounding areas (residential properties, care homes, schools, health care facilities, workplaces, transport links, etc.); and • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.
LD2_FFD_817	Consultation and engagement	7. Poor Communication and Consultation Process	No	The Applicant makes note of this comment. Communications were issued at each key stage of the NSIP planning process, including following submission of

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		IGP's engagement with the local community has been wholly inadequate. Residents living near the proposed site were not informed at key stages of planning, and a significant portion of Malmesbury's population remains unaware of the potential impacts, including footpath closures and road disruptions. A project of this scale requires extensive and proactive community engagement, which has been lacking.		the Environmental Impact Assessment (EIA) Scoping Report on 16 July 2024, following publication of the Statement of Community Consultation (SoCC) on 14 January 2025 and publication of the Preliminary Environmental Information Report (PEIR) on 29 January 2025. The Applicant included the town of Malmesbury (and the Malmesbury Without Parish district) in the core consultation zone established for the statutory consultation, therefore all addresses in the area were issued a direct postal notification of the consultation including details on how to participate and find out more about the Scheme at that stage. The Applicant also held an in-person event in the area, at Malmesbury Town Hall, during the statutory consultation period to support meaningful local participation as the proposals continued to be refined. Further details are included in Chapter 7: Statutory Consultation under section 47 of the Planning Act 2008 of the Consultation Report [EN010168/APP/5.1]
LD2_FFD_817	Landscape and visual	Q5 [comments on indicative masterplan] - How can you possibly say this is a MASTERPLAN? A comical	No	The Scheme is located adjacent to the Cotswold National Landscape. However, it has been agreed that parts of Site A, B

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		misrepresentation of reality. This site borders AONB, the Fosse Way, G1 listed buildings, excellent land as we know well given our own experiences, is surrounded by small lanes inappropriate to large scale construction, 20km from the nearest substation, etc the list goes on. Note the site of the BESS is uninsurable. Is this really just cynical green washing to make a quick £500m? Q6 [comments on design principles] - You can't assure local people on any of the above until you clarify your plans not to flip the project after planning is granted. The question above is thus totally invalid. Q7 [comments on the assessment of potential effects / Landscape] - We will be forced to close our business resulting in job losses. We are deeply concerned by the safety of our children riding on roads, getting to the village and schools with 100+ HGVs passing each day. How have you arrived at the decision to locate next to AONB? You admitted in consultation this is the cheapest option - i.e. in your best interests and nothing to do with the points you raise above.		and C are within the setting of the Cotswolds National Landscape where panels have been set back by one field. Panels on the edge of the Cotswolds National Landscape have been removed from the scheme following the Preliminary Environmental Information Report (PEIR) submission. These fields are proposed for positive enhancement. Refer to Environmental Statement (ES) Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_817	Ecology and biodiversity	Q8 [comments on the assessment of potential effects / Ecology] - We don't need an industrial solar park to enhance ecology - there are much more effective ways of achieving this. Please don't mask this in that rhetoric. Highly misleading	No	Solar Parks can enhance overall biodiversity, particularly when sited on existing intensively managed arable land. A detailed assessment of impacts on ecological features, including details on where the scheme is expected to provide ecological benefits, is provided within Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .
LD2_FFD_817	Socioeconomics, tourism, recreation and health / Transport and access	Q9 [comments on the assessment of potential effects / Environment] - This is one of the most prolific equine areas of the UK. You have done no research into this in any of your work to date. We will have to close down our stud and many others will be forced to do the same https://www.theirishfield.ie/bloodstock/news/bloodstock-industry-warned-of-threat-from-solar-battery-projects-860273	No	The Applicant has assessed the likely significant effects on equestrian businesses likely to be affected by the Scheme in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] . The quoted article refers to risks from BESS fires which affect people, horses, and the rest of the natural environment alike. As such, the Applicant has committed to an Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] as secured by requirement in the draft Development Consent Order (DCO) [EN010168/APP/3.1] . This sets out battery fire mitigation and management measures to minimise the risk of fires occurring and setting out procedural measures to reduce the impact of a fire if it occurs.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_FFD_817	Site selection and alternatives	Q10 [comments on the Cable Route Search Corridor] - You have done no research into the land you are impacting on this route, the loss of local jobs, the cost to businesses and instead rely on bullying residents via CPOs, etc.	No	More information regarding selection of the cable route corridor is contained within Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] . This includes details of the methodology adopted when selecting initial route options such as the desire to keep the route straight, buffers around residential properties, minimising impacts on designated areas, ancient woodland and local wildlife sites, and minimising crossings of utilities, transport infrastructure, hedgerows and watercourses.
LD2_FFD_817	Project description and DCO process	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Where is the contingency fund?	No	The Applicant will provide a community benefits package as part of the Scheme. Potential on-site and off-site initiatives that could be developed over the lifespan of the Scheme are currently being investigated.
LD2_FFD_817	Community benefits and impact	Q12 [suggestions for on-site community benefits] - Bribes for destroying people's lives is underhand and deeply unsavoury. Are you finally admitting that destroying this area should result in compensation? Q13 [suggestions for off-site community benefits] - Bribes don't work. You need to reveal how much you are making at the expense of destroying a vast area of land	No	Q12/Q13- The applicant acknowledges the concerns expressed and recognises that some residents view the proposals as harmful to the local area. The Community Benefit Fund is not intended as compensation, but as a way of ensuring that, should the Scheme proceed, there is a mechanism for delivering support via on-site and off-site community benefits to local initiatives identified by communities

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and communities. Q14 [Additional comments] - IGP / Macquarie are demonstrating an extreme and cynical example of green washing for the gain of off shore tax efficient vehicles. This is masked by a bunch of consultants to set up a quick profit at the expense of local people. The consultation process has been a farce and was admitted as such by ██████████ the then CEO in May 2024. ██████████ assured us he would get in touch to explore our concerns in May 2024, and again in January 2025. We have yet to hear anything at all.		and their representatives themselves. The applicant remains committed to consulting openly on this approach. Q14- The applicant refutes the suggestion that the consultation has been conducted in bad faith. The consultation has followed the formal process required under national infrastructure planning legislation, with multiple opportunities for stakeholders to provide feedback. The development is being brought forward in line with national policy and legal frameworks, with the aim of supporting the UK's transition to a low-carbon energy system.
LD2_FFD_883	Project description and DCO process / Cumulative Effects	Q4 [overall comments] - I object to current plans for the Lime Down Solar Park. My objection is based on a number of factors. First there is the sheer scale of the solar park and the resultant industrialisation of farmland across multiple sites in North Wiltshire. This is a rural environment dependent on tourists and life and local businesses with be significantly disrupted for years during construction and then beyond will the solar equipment is in place. Secondly there is the fact that this solar part is not in isolation. There is imminently to be built the Leigh Delamere solar park on the east side of Sevington and also the Red Barn solar	No	Although the Applicant appreciates Wiltshire hosts a large number of solar developments, it is not the area with the highest concentration in the UK. The impact of these solar developments (both existing and forthcoming) has been fully assessed within the Environmental Statement (ES) [EN010168/APP/6.1]. Existing solar farms are considered in the baseline of each of the technical chapters in ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]. Forthcoming schemes are assessed within ES Volume

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		park in Kington St Michael. The cumulative effect of multiple solar parks all with a few miles of each other fundamentally changes the characteristics of the landscape and life for residents and businesses nearby. The cumulative effect of so many solar parks in close proximity has an oppressive effect on the local population and will cause stress, noise, traffic, disruption and vibration for years as they developments are build one after the other. I live in Sevington and the Leigh Delamere solar park is due to be constructed in fields immediately east of the village later this year. We will have construction traffic routed through the village and noise, dust, disruption and vibration to contend with during that build. IGP have advised that the cabling for Lime Down is likely to be routed over the M4 at Sevington (either to the east or west) and so the same small community will have to contend with construction traffic, noise, disruption connected to the cabling infrastructure within only a year or two of Leigh Delamere Solar Park being constructed. Both are likely to involve traffic and noise through Sevington, which from the West, is accessed by a single track road. Sevington is a conservation village full of listed buildings and yet life in that village is going to be fundamentally altered for years and years by		1, Chapter 21: Cumulative and In-combination effects. Both Leigh Delamere (221) and Red Barn Solar Park (243) have been considered as part of the Chapter 21. The only significant cumulative effects anticipated as a result of these Schemes interacting with Lime Down Solar Park (amongst others) is on Tourism and Recreation receptors (Corsham Park, WT HULL 29 and WT CORM 122 and Sustrans Cycle Route 403) during Construction. These effects are anticipated to be temporary in duration being intrinsically linked to the construction of the Scheme. A detailed description of how these two Schemes are likely to interact with Lime Down Solar Park in terms of impacts to Landscape can be found in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] under the header 'Cumulative Effects within the 5km Outer Study Area'. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		construction and works linked to these considerable developments being constructed one after the other over a period of years. There appears to be very thought given to the cumulative effect of the disruption, noise and stress this protracted period of construction will cause. Further, on scrutiny of the potential cabling corridor, I can see that part of my back garden is within the cabling corridor for Lime Down. This is despite the fact that the cabling corridor is several miles wide and there being ample opportunity to take cabling only over agricultural, rail or public land. The stress caused by the thought that part of our domestic garden could be acquired or used for this project has been considerable and need not have happened if the developers had excluded domestic premises from their potential cabling corridor from the start. I attended a statutory consultation call on 5th February and was told by a representative if IGP (Delacour McLaren) that there was "no intent" to use domestic property and/or domestic property would be avoided "wherever practicable". With acres and acres of arable, rail and public land available within the cabling route, it is entirely feasible to avoid domestic land.		[EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise. The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and

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		On that basis, I believe the developers should have excluded all domestic land from the cable corridor prior to publishing their initial plans. As must be foreseeable, considerable stress has been caused and this could have been avoided by greater clarity and transparency up front. Q5-Q14 - Please see my above answer and stated concerns.		Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction.
LD2_PFF_216	Project description and DCO process	Q4 [overall comments] - [Landscape and visual] This will ruin the landscape around Foxley, Norton, and Sherston [Ecology and biodiversity] Having read the relevant sections of the PEIR I am not convinced that enough attention is being paid to this [Hydrology] This is a huge concern, in an area already highly and increasingly vulnerable to flooding [Transport and access] Local single-track roads will be unable to handle the high numbers of HGVs that this project will entail [Site selection] This location on productive farmland is wholly unsuitable - not least given the need for a huge length of cabling to connect to the grid, all the way down near Melksham A real concern is that so much detail still	No	The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) as part of the iterative design process, in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this reduction in the Scheme's red line boundary, panels along the edge of the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		remains to be set out on this project. When quizzed at various consultation meetings, your representatives were frequently vague and lacking in their ability to respond effectively to questions and often gave contradictory responses. There is far too much information still lacking; this does not inspire confidence and is leaving residents in the dark!		Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The design will incorporate minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland and hedgerows, public rights of way and watercourses.

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				Flood risk has been assessed in detail within Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the supporting Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. This work includes baseline analysis, modelling of runoff, and review of climate change allowances. The Scheme is designed to ensure runoff rates and volumes remain consistent with greenfield conditions. Measures such as permeable surfacing, infiltration features, swales and attenuation storage will manage surface water. As a result, no increase in flood risk is expected on or off site, including to adjacent communities and downstream settlements. Embedded mitigation and design measures will be secured through the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and finalised at detailed design. The capacity of local roads/infrastructure to accommodate construction vehicles is assessed in ES Volume 1, Chapter 13:

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				Transport and Access [EN010168/APP/6.1], which concludes there are no significant adverse impacts. ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] also identifies specific highway improvement areas where traffic management or passing bays may be required on narrower sections of the construction routes. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of

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				ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_PFF_216	Ecology and biodiversity	Q5 [comments on indicative masterplan] - What are the proposals for the ecological mitigation zones? None outlined at present, and when asked at consultation meetings your representatives were unable to provide any additional information. In particular, where land earmarked for ecological mitigation is currently in arable productions, how do you propose to convert to grassland, and deal with weed control (thistles, [illegible]) which will no doubt flourish after years of phosphate use? Ditto for land under panels - how will this be managed and weeds controlled? Who will be responsible for ongoing management issues and how will compliance be monitored? [...] Q8 [comments on the assessment of potential effects / Ecology] - Having read the PEIR, it is impossible to comment in detail on this as much of the information remains lacking, and is to be set out in future documents (e.g. environmental management plans). However, irrespective of what you eventually propose, the main question is: how will any plans be properly maintained going forward through the lifetime of the project to ensure that mitigation measures	No	Ecological mitigation and enhancement proposals are described in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. It is acknowledged that not all information on ecology was presented at PEIR stage. The purpose of PEIR is to provide a preliminary assessment of the ecological effects of the proposed scheme. As such finalised assessments are not provided at PEIR to allow the Applicant time to take on the feedback received at Statutory Consultation and work this into the design envelope to be submitted in the DCO application. The ecological mitigation and enhancement proposals are also shown in in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.1]. Management of retained and newly created habitats, to include management of expected initial flushes of weeds and ruderals, as well as management of grassland underneath panels, are prescribed within the Outline LEMP [EN010168/APP/7.18]. This includes a comprehensive ecological monitoring programme designed to ensure habitats are establishing as expected, and

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		are implemented effectively? Q9 [comments on the assessment of potential effects / Environment] - See above.		determine remedial action in any instance where they are not.
LD2_PFF_216	Landscape and visual / Site selection and alternatives	Q6 [comments on design principles] - I do not believe that you are being driven by these principles at all - you are only being driven by what will obtain maximum profit, and where you think you can get away with it. [...] Q7 [comments on the assessment of potential effects / Landscape] - This project would totally ruin the local landscape around Foxley, Norton, and Sherston. The panels will be highly visible from a significant distance, and will be far too high for any screening to be effective. The impact on the nearby Cotswolds Area of Natural Beauty and a number of listed buildings is of particular concern.	No	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The Scheme is located adjacent to the Cotswold National Landscape. However, it has been agreed that parts of Site A, B and C are within the setting of the Cotswolds National Landscape where panels have been set back by one field. Panels on the edge of the Cotswolds National Landscape have been removed from the scheme following the PEIR submission. These fields are proposed for positive enhancement. Refer to ES Volume 2: Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/6.2] The LVIA includes a full assessment of effects on the special qualities of the adjacent Cotswold Natural Landscape in ES Volume 3, Appendix 8.6:

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Assessment of Effects on the Special Qualities of the Cotswold National Landscape.
LD2_PFF_216	Site selection and alternatives	Q10 [comments on the Cable Route Search Corridor] - Far too little detail provided on this at the present time - and as such it is impossible to comment properly on the proposed cable route. In general, however: one of the key problems with this project is the fact that it is so far from the Melksham substation - the amount of disruption that will be involved in establishing a grid connection is totally outrageous. Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - See above.	No	Details of the Cable Route Corridor (as refined for Development Consent Order (DCO) application submission) can be found in Environmental Statement (ES) Volume 1 Chapter 2: The Order Limits [EN010168/APP/6.1]. More information regarding selection of the cable route corridor is contained within ES Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. This includes details of the methodology adopted when selecting initial route options such as the desire to keep the route straight, buffers around residential properties, minimising impacts on designated areas, ancient woodland and local wildlife sites, and minimising crossings of utilities, transport infrastructure, hedgerows and watercourses. Regarding the distance from Melksham substation, more information regarding how the site was selected can be found in ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection

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				Assessment Report [EN010168/APP/6.3]. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.
LD2_PFF_216	Community benefits and impact	Q12 [suggestions for on-site community benefits] - The local community is almost overwhelmingly opposed to this project, and will not be bought off with spurious "community benefits". They see this for what it is - a project that will have a hugely detrimental impact on local communities and landscapes overall Q13 [suggestions for off-site community benefits] - See above. The local community is almost overwhelmingly opposed to this project and will not be bought off with spurious "community benefits" Q14 [Additional comments] - Wrong project, wrong location, and purely for the benefit of a few greedy shareholders resident overseas. The local community will see no benefit from this, and the impact at the local level will be hugely detrimental	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, provide employment and income especially during construction and peak replacement activities, provide skills and training opportunities, provide onsite permissive paths to increase access to the countryside, provide improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Scheme cannot meet but that the Applicant wants to be able to contribute towards. The Community Benefit Fund is separate from the Development Consent Order

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				(DCO) process, and so is not bound to the same timescales or information requirements as submitted information. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. Decisions on funding will take place following DCO consent being granted.
LD2_PFF_213	Project description and DCO process	Q4 [overall comments] - [Climate change] Limited sun in the UK hence unsuitable [Landscape and visual] 4.5m high panels on often undulating land [Ecology and biodiversity] Where to start! [Cultural heritage] Fosse way [Transport and access] Narrow country lanes not suitable for HGV lorries [Noise and vibration] Construction and noise after build [Socioeconomics] Impact on footpaths and bridleways [Soils and agriculture] It will turn to brownfield land [Human health] Already an impact on mental health/stress locally [Site selection] Via greedy farmers giving cheaper alternatives to more suitable	No	Solar energy is at the heart of the Clean Power 2030 Mission (April 2025 revised draft NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the Statement of Need [EN010168/APP/7.1] and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 9.5) demonstrate that a multi-technology approach to electricity supply can reduce

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		locations - The project does not fit with the location - It all comes down to money not the environment - Offshore company, panels from China - no UK gain or benefit to local area - Battery fire hazards - impossible to extinguish - toxic emissions - Two plus years of construction and disruption in a rural area. Not equipped for HGB lorries - Pollution from construction		the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability. Finally, that other countries may experience higher solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work or should not be pursued. Government policy is clear that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system, consumers and to help meet UK clean power targets. The capacity of local roads/infrastructure to accommodate construction vehicles is assessed in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], which concludes

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				there are no significant adverse impacts. ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] also identifies specific highway improvement areas where traffic management or passing bays may be required on narrower sections of the construction routes. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. The noise and vibration impact from construction are assessed in Section 14.10 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with

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				supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of determinants of health, with mental health aspects to

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has explored ways to ensure members of impacted communities have access to mental health resources during and following the Development Consent Order (DCO) process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_PFF_213	Landscape and visual	Q5 [comments on indicative masterplan] - A -> E! Very little of these sites is appropriate for solar. Size is relevant to by-pass council jurisdiction with no consideration to whether the land is appropriate Q6 [comments on design principles] - Hedgerow and trees planted will take circa 15 years to grow to a significant size to conceal panels by which time something else will replace solar Q7 [comments on the assessment of potential effects / Landscape] - Undulating areas especially inappropriate for solar panels Q8 [comments on the assessment of potential effects / Ecology] - It will be devastating, destroying habitats - planting new hedges etc. cannot replace these habitats. The panels will rob them of sunlight	No	The landscape and visual effects of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Potential impacts of the Scheme are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1] and ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]. This assessment considers all phases of the Scheme, including the construction phase, and describes appropriate measures to avoid or mitigate identified impacts.
LD2_PFF_213	Climate change and energy need	Q9 [comments on the assessment of potential effects / Environment] - Huge carbon footprint to import panels, pollution from construction, biodiversity loss, loss of amenity farmland etc etc!		The emissions associated with import of panels and materials is considered in Environmental Statement (ES) Volume 1 Chapter 7: Climate Change [EN010168/APP/6.1] .

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				The Chapter concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme contributing to decarbonisation of energy from the National Grid. A full assessment of impacts on ecology is provided in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. A Biodiversity Net Gain Assessment and completed DEFRA Metric has been submitted with the Development Consent Order (DCO) application in DCO Volume 7 Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [EN010168/APP/7.9], both of which demonstrate how the Scheme will deliver a quantifiable net gain for biodiversity. As set out in ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1], construction dust emissions, construction vehicle emissions and emissions from Non-Road Mobile Machinery (NRMM) (onsite plant) have been considered for the construction phase. The assessment has been undertaken in accordance with best

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				practice guidance. With the embedded mitigation measures in place, as set out in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22], air quality effects as a result of the construction phase of the Scheme would not be significant. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. ES Volume 1, Chapter 4: Alternatives and Design Evolution

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				[EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds (in addition to alternative technologies). The Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites. The Scheme seeks to minimise disruption to the use of PRowS during construction. Diversions or closures to facilitate construction works will only be undertaken where necessary, and will be temporary in nature with signage and prior notice provided as set out and secured through the Outline PROWMP [EN010168/APP/7.17]. During the Scheme's operation, the routing of all PRowS is preserved. PRowS will also be given a minimum 15m setback to the nearest solar PV structures, with 2.5m deerstock fencing set approximately 10m from the PRow centreline. Where PRowS run along hedgerows, the hedgerows will be retained. PRowS will be kept clear with surrounding areas planted only with low-

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				level groundcover (such as wildflower meadow mix) to retain a more open aspect along PRowS. Additional landscape and ecological enhancement planting with help to visually separate recreational users from onsite infrastructure. The Outline PROWMP [EN010168/APP/7.17] requires the reinstatement of any PRow furniture, enclosures, and surface treatments where they are altered or damaged by construction activities. The Applicant is also open to exploration of improvements to PRow access through removal of stiles and gates to create better access for PRow users without encouraging nuisance behaviour. This is likely to be delivered through the Community Benefit Fund in coordination with Wiltshire Council's Public Rights of Way Team.
LD2_PFF_213	Site selection and alternatives	Q10 [comments on the Cable Route Search Corridor] - This is insane! Melksham is circa 20km from the site. CPOs to acquire land for the cable are criminal and akin to bullying	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_PFF_213	Decommissioning and construction	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - The decommissioning - IGP doesn't care - they will be long gone - panels will hardly be sent back to China. Landfill?	No	Once the Scheme's operational life ends, the infrastructure will be removed, and the land returned to its previous use in accordance with a Decommissioning Strategy. An Outline Decommissioning Strategy is available in Development Consent Order (DCO) Volume 7 [EN010168/APP/7.14]. Most of the infrastructure utilised for the Scheme is recyclable, with over 95% of the solar PV panels currently recyclable, and the metal tables almost entirely recyclable.
LD2_PFF_213	Socioeconomics, tourism, recreation and health	Q12 [suggestions for on-site community benefits] - The project is taking away our nature trails and permissive paths. I'm not sure anyone would enjoy walking through 4.5m high solar panels. The project will take away from the community far more than it could possibly give back Q13 [suggestions for off-site community benefits] - This is not a silver lining! Many people's houses will become negative equity. You are also recognising that lime down will be the cause of mental health issues and negative environmental impact. Small community business's will also suffer	No	The Applicant has assessed the likely significant effects on PRoW and recreational routes affected by the Scheme in Environmental Statement (ES) Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. The Scheme also provides new permissive paths across all five of the Scheme's Sites, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. PRoWs will also be given a minimum 15m setback to the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				nearest Solar PV Panels, with 2.5m deerstock fencing set approximately 10m from the PRow centreline. Where PRow run along hedgerows, the hedgerows will be retained. PRows will be kept clear with surrounding areas planted only with low-level groundcover (such as wildflower meadow mix) to retain a more open aspect along PRows. Additional landscape and ecological enhancement planting with help to visually separate recreational users from onsite infrastructure. The Applicant has assessed the mental health and wellbeing impacts associated with the Scheme in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. The Applicant has assessed the likely significant effects on agricultural businesses, and tourism-dependent businesses likely to be affected by the Scheme in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1].
LD2_PFF_213	Project description and DCO process	Q14 [Additional comments] - Very clearly I am against the project - I cannot see one positive for the local community, wildlife or environment. I understand the need for green energy and am all for solar on rooftops but this is a project of greed and	No	The Statement of Need [EN010168/APP/7.1] describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure,

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		admissible only through labour government net zero loop holes		reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). National Policy Statement EN-1 also states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established [EN-1 Paras 3.2.6 - 3.2.8]. This representation goes to the merits of the NPS, and to have regard to it would be directly in contradiction of NPS EN-1 (in particular the paragraphs cited above that make clear that the need is established and that there is no requirement to consider the contribution of individual projects). The determination of the Applicant's DCO Application is not the means by which to challenge the provisions of the NPS, and it is for this reason that the ExA and SoS are able to disregard this representation and any

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				similar others, pursuant to sections 87, 94 and 106 of the Planning Act 2008 during the examination of the Application and when determining the Application.
LD2_PFF_207	Project description and DCO process	Q4 [overall comments] - Climate change: Where are the panels made? What is there carbon footprint 'cradle to grave'. Landscape: The panels could be up to 4.5 meters their glare is blinding. Ecology: We have many species of bats and birds in the area that will be adversely affected. Arboriculture: Many hedges will be ripped out for the solar field and cable run - unacceptable. Hydrology: We live near gauze brook which is already flooding and any further flood risk is alarming. Cultural heritage; we have many archaeological sites in the area, soldiers grave round barrows, long barrows... Transport: Our roads are narrow and have many dangerous corners 100's of lorries would be dangerous. Noise: This is the countryside, with bird song and rustling leaves not pile drivers! Air quality: The 1000's of glass solar panels will heat up the air. Socioeconomic: Who wants to see solar panels!	No	The effects of emissions generated from embodied carbon within products to be used on site as well as construction, operation and decommissioning emissions are all considered in Environmental Statement (ES) Chapter 7: Climate Change EN010168/APP/6.1]. The CO₂e figures are included in detail within the ES chapter. Emissions from production of the required cables are included within the assessment. The chapter concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme contributing to decarbonisation of energy from the National Grid. Further, as outlined in the chapter, the emissions of replacing the solar panels, inclusive of the embodied carbon (manufacturing and transportation emissions) are considered in the assessment. The DESNZ conversion

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Soils: Our soil is delicate, continual run off will cause erosion. Human health: Instead of a peaceful, calming walk in countryside from panels moving, inverters, etc, they will be humming. Ground conditions: The substation will be sprayed to stop plants growing, concrete there forever! Cumulative effects: Wiltshire has enough panels on its farmland no more. Site selection: Why so far from Melksham.		factors, which were used for the assessment of embodied carbon, cover the extraction, primary processing, manufacture and transportation of materials. Baseline and future conditions are set in section 7.7 of the assessment. Although, it is expected there will be some baseline emissions from the Site's current use and some carbon sequestration from the grassland once the Scheme is in place, as a conservative approach, the baseline emissions and the grassland sequestration were considered zero. Potential impacts of the Scheme on bats, including species associated with the Bath and Bradford-on-Avon Bats SAC are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. This is underpinned by information collected from a comprehensive programme of bat surveys, details of which are provided in ES Volume 3, Appendix 9-4: Bat Survey Report [EN010168/APP/6.3].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				Potential impacts of the Scheme on birds, including bird species breeding or likely to be breeding within the Order Limits, are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. The Scheme has been designed in order to retain existing arboriculture features as far as practicable. Any unavoidable tree losses as a result of the Scheme will be suitably mitigated for. This is set out in ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]. The Scheme has been designed to retain existing hedgerows and grassland habitats as far as practicable. Some loss of hedgerows will be required to provide new access and infrastructure. Anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits, and planting of new hedgerows will far outweigh losses. Proposed new hedgerows are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The noise and vibration impact from construction are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] which is secured through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. The cumulative assessment, presented in Section 14.13 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1], does not identify any significant adverse effects between the Scheme and other proposed and committed plans and projects. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Fthenakis, V., & Yu, Y. (2013), (Journal of Solar Energy Engineering) completed an 18-month study which showed that in most days, a solar array was completely cooled at night, and, thus, it was unlikely that heat island effects will occur from large solar arrays. Barron-Gafford G. A., Minor, R. L., Allen, N. A., Cronin, A. D. Brooks, A.E. and Pavao-Zuckerman, M. A. (2016) completed a study on the photovoltaic heat island effect which showed that, temperature increases are localized and do not substantially extend beyond the immediate solar farm boundary

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The microclimate and heat island effects from solar farms are considered not significant for nearby residents. Temperature variations remain within acceptable environmental parameters, posing no meaningful thermal stress or discomfort to surrounding communities. No significant effect is likely as a result of microclimate. Although the Applicant appreciates Wiltshire hosts a large number of solar developments, it is not the area with the highest concentration in the UK. The impact of solar developments (both existing and forthcoming) in the areas surrounding the Scheme been fully assessed within the ES [EN010168/APP/6.1]. Existing solar farms are considered in the baseline of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]). Forthcoming solar developments are assessed within the cumulative and in-combination effects section of each technical chapter (ES Volume 1, Chapter 7-20 [EN010168/APP/6.1]) and summarised in ES Volume 1, Chapter 21: Cumulative and In-combination effects.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The chapter concludes the only potentially significant cumulative effects resulting from the Scheme interacting with others are on the Landscape 1km Study Area during construction and year 1 of operation and to the following tourism and recreation receptors during construction: Corsham Park, Footpath WT HULL 29, byway WT CORM 122, Sustrans Cycle Route 403 and White Walls Way. Both these effects are temporary in duration being intrinsically linked to the construction phase. While the Scheme does give rise to two cumulative effects, this outcome is notably restrained given its scale and complexity. At 500 MW, it represents a substantial infrastructure project, and yet its cumulative footprint remains limited — a reflection of careful site selection, embedded mitigation, and design sensitivity. The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. High voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the

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				approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the ES [EN010168/APP/6.1] detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.
LD2_PFF_207	Climate change and energy need	How much steel and or concrete is required for the development. What is the carbon footprint of this steel and concrete. What is the carbon footprint for transporting the solar panels from China (IGP consultants said they are to be manufactured in China) to the UK	No	The materials and waste emissions are assessed in Environmental Statement (ES) Volume 1 Chapter 20: Other Environmental Matters [EN010168/APP/6.1]. This chapter concludes that the estimated quantity of steel required for the construction of the

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		(presumably by ship) then unloaded to lorries (what is the lorries emissions). What is the financial cost to UK. I.e. does the government give subsidies to the companies providing this renewable energy, if so what are the figures? How much of tax payers money is helping subsidise these companies. Do they pay tax in this country?		Scheme is 20,000 tonnes, 0.14% if the national material availability. Concrete has only been assessed at regional level in line with the Scoping Opinion response, and is estimated to require 1,570 tonnes for the Scheme, 0.06% of the regional material availability. At the time of writing, the manufacturer of Solar PV Panels has not yet been chosen. It is assumed that the Solar PV Panels will be sourced from China as China accounts for 80% of global Solar PV Panel production. The manufacture and transport of Solar PV Panels and batteries are the largest sources of GHG emissions from the Scheme (84% of total construction emissions). The transportation of materials by sea is estimated to be 16,615 tCO₂e, 7.1% of the total construction emissions. The total emissions from worker transportation and delivery vehicles is estimated to be 13,187 tCO₂e, 5.6% of the total construction emissions. The Applicant confirms that Lime Down Solar Park is being developed solely through private sector financing and that it has not received, and is not receiving any state subsidies, including any contracts, tariffs or grants.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Funding Statement [EN010168/APP/4.2] submitted with the Development Consent Order (DCO) application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
LD2_PFF_207	Landscape and visual / Ecology and biodiversity / Soils and Agriculture	Q5 [comments on indicative masterplan] - The proposed solar development is so large that the character of my home, my village and the surrounding villages will be changed for the next sixty years. English countryside is precious, for many reasons, one: would be the habitat it provides for fauna and flora. Two: the agricultural land that provides food and energy for the country [my neighbours are farmers, one side is a dairy farm that produces milk for waitrose, and the other side is a farmer that produces bio fuel (woody biomass, which is a renewable energy source)]. Q6 [comments on design principles] - How can 4.5 metre panels be hidden from view? What is the noise pollution produced by the inverters/transformers/motors that move the panels. Has any studies been made on the glare produced by such a huge area. Q7 [comments on the assessment of	No	Q5. A full assessment of impacts on ecology is provided in Environmental Statement (ES) Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. A detailed assessment of the likely significance of effects of the Scheme on employment and the economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. This assessment considers the impact on construction and engineering, agriculture, and potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. Q6/7. The landscape and visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. This includes an

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		potential effects / Landscape] - People that live here, often enjoy the countryside. Walking, dog walking, running, cycling, horse riding, bird watching. Many come to the area to visit, staying at our many hotels, B&B's, in order to enjoy our countryside - they simply won't come to see solar panels. Q8 [comments on the assessment of potential effects / Ecology] - Have any studies been done on the effect of the electro magnetic radiation produced, and the effect they have on migrating birds or bats.		assessment of effects on all affected Public Rights of Way and the effects on the landscape character. Q8 - There is no evidence to suggest that EMFs associated with typical solar array infrastructure can cause impacts on terrestrial wildlife (including bats and birds) and, due to the burial, sheathing and relatively low voltage of cabling within generating stations, the overall risk of EMFs resulting in significant effects on terrestrial wildlife is considered highly unlikely.
LD2_PFF_207	Hydrology, flood risk and drainage	Q9 [comments on the assessment of potential effects / Environment] - The Gauze Brook floods and I would be worried that vast fields of glass panels would increase the risk of flash flooding.	No	The Flood Risk Assessment and Drainage Strategy in Appendix 11.1 of the Environmental Statement has assessed the potential for the Scheme to increase flood risk both on-site and downstream, including any impact on Gauze Brook. While it may appear that fields of solar panels would behave like impermeable surfaces, this is not the case. Solar panels are mounted above the ground, with wide spacing between rows and vegetated ground beneath. The panels are installed

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				on posts that do not require large foundations, and the land is managed as permanent grassland to encourage natural infiltration of rainfall. This setup allows rainfall to reach the ground and soak into the soil, limiting the potential for increased surface water runoff. Research has shown that, when designed and managed appropriately, solar panel arrays do not increase runoff compared to agricultural land. In fact, the cessation of ploughing, compaction from heavy machinery, and agrichemical application improves soil structure and infiltration over time. This, combined with the embedded drainage measures proposed for infrastructure areas (e.g. substations and battery units), ensures that runoff from the Scheme is either reduced or attenuated to greenfield rates. The Scheme design includes drainage measures for critical infrastructure and a commitment to maintain the existing surface water regime. Therefore, the development is not expected to increase the risk of flash flooding to Gauze Brook or surrounding areas.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_PFF_207	Cultural heritage	Q10 [comments on the Cable Route Search Corridor] - We live directly on the cable route there is many areas around our home and my neighbours home that have significant archaeological interest.	No	Ongoing geophysical survey of the corridor is being undertaken to further inform the Scheme's mitigation strategy (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3.12.6)), and any archaeological assets identified within the cable route corridor will be appropriately mitigated.
LD2_PFF_207	Transport and access	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Our little lanes are not built for HGV's. There is a big risk of accidents involving horse riders or cyclists.	No	Proposed construction vehicle routes are set out in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2, Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2] . The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the CTMP which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				of the DCO. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects.
LD2_PFF_207	Community benefits and impact	Q12 [suggestions for on-site community benefits] - The biggest benefit would be if IGP go back to Ireland and macquarie go back to Australia. Q13 [suggestions for off-site community benefits] - Keep your money and leave England alone (Thames water could do with some help!). Q14 [Additional comments] - Put time and money into putting solar on rooves of Britain. Also insulate homes save energy.	No	The Applicant acknowledges the strength of feeling expressed and understands that some members of the community may not view community benefit proposals as appropriate in the context of this development. Nonetheless, the applicant remains committed to continued consultation on a Community Benefit Fund, which aims to support locally identified priorities should the Scheme proceed. Q14 Section 4.2 of the Statement of Need [EN010168/APP/7.1] explains that the Government does not believe that decentralised and community energy systems, which by definition include rooftop schemes, and may also include other small scale solar such as walls or fences, will replace the need for new large-scale electricity infrastructure to meet our energy objective [EN-1, Para 3.3.12]. Further, that in its Clean Power 2030 Action Plan, the Government has set capacity ranges for large-scale solar in

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				2030 and 2035 to chart a path towards achieving its Clean Power Target. In June 2025 the Government published its UK Solar Roadmap, summarised at Section 3.10 of the Statement of Need. The Roadmap confirms that “Solar energy is one of the cheapest forms of electricity generation and will play a key role in reaching clean power. It will enable cheap, efficient electricity to drive other sectors of the economy” (p15). The Roadmap talks to the benefits of increasing small scale / rooftop solar generation in the UK to directly support reducing consumer bills, as well as the further deployment of ground mounted solar because “Ground-mounted solar is one of our cheapest electricity sources to build and operate at scale” and “Speed of deployment is also a huge benefit of solar” for both ground mounted and rooftop schemes (p15). This “makes installing solar one of the fastest ways the UK can reduce its dependence on volatile fossil fuel markets.” The Roadmap includes illustrative deployment scenarios which “show that reaching the Clean Power 2030 range is achievable, but will require significant

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				action" (p16). Large-scale solar represents 60-65% of the UK's installed solar capacity by 2030 in the Roadmap's illustrative deployment scenario. Ground mount solar is therefore a critical technology for the UK and must continue to be pursued. Achieving the Clean Power 2030 range through the illustrative deployment scenario will require a doubling of current domestic and smaller scale commercial scheme capacities (estimated currently to be c.10GW) in just 5 years. Any shortfall in deployment of these schemes must be made up for by other technologies, including from large scale schemes. These publications make it clear, and the Applicant agrees, that although smaller scale solar, including in all those places suggested in this Response, is an important part of the journey to achieve a clean energy system and net zero emissions by 2050, small scale solar on its own cannot achieve those aims and therefore small scale solar is not an alternative to the Scheme, but is required in addition to the Scheme.
LD2_PFF_212	Project description	Q4 [overall comments] - [Climate Change] We have to measure the change Rain and	No	The capacity of local roads/infrastructure to accommodate construction vehicles is

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	and DCO process / Landscape and visual	global warming [Transport and access] The road network would not substantiate the load [Human health] This is the most important. Given the timescale and the impact on residents [Site selection] There has been little or no selection and it is opportunism I am supportive of small scale local solar installations and have a solar installation within the Lime down solar park. However this scheme is oversized over specified and completely detached from the locality and the grid. It fails on all counts and is purely a financial opportunity that is being exploited with no regard to the physical or community location. It is too much and too oppressive and will take too much resource to establish. There will be no BNG that is pure greenwash.		assessed in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], which concludes there are no significant adverse impacts. ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] also identifies specific highway improvement areas where traffic management or passing bays may be required on narrower sections of the construction routes. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise. Since the Stage Two (statutory) consultation, the Applicant has undertaken further refinement of the Scheme design in line with the iterative design process. This has resulted in a number of reductions to the Scheme boundary, as detailed in ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Notable areas of land removed from the Solar PV sites following statutory consultation are identified in that chapter, with all removals illustrated in ES Volume 2, Figure 4-2 and Figures 4-2-1 to 4-2-8 [EN010168/APP/6.2]. The total area of the Solar PV Sites (excluding the Cable Route Corridor) has reduced to 749 ha (from 878 ha at PEIR), while the Cable Route Corridor has been reduced from the larger Cable Route Search Corridor presented at PEIR to cover 462 ha (from 1,947 ha at PEIR).

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The statutory consultation included a preliminary design and assessment. The Development Consent Order (DCO) application includes the updated design and a thorough assessment of the impacts in the ES [EN010168/APP/6.1]. The Applicant is confident that the proposed mitigation measures set out in the ES are adequate and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [EN010168/APP/7.2]. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
LD2_PFF_212	Landscape and visual	Q5 [comments on indicative masterplan] - The concentration within Areas C and D are too great. There is not a wide enough boundary to the Fosse way. No consideration has been given to the impact of construction traffic within those areas. If there is to be screening the investment should be made before the project starts not after the event.	No	A full Assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA), including the effects on the Fosse Way. Refer to Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Q6 [comments on design principles] - The attempt to "minimise the impact" is a fallacy. The minimum impact can be obtained by reducing the number and concentration of panels thereby reducing the income of the project ergo it is less viable Q7 [comments on the assessment of potential effects / Landscape] - The impact would be devastating. It is quite ridiculous that one side of a fence could be designated AONB and the other an "industrial" solar park Q8 [comments on the assessment of potential effects / Ecology] - All these measures can be achieved without fencing without construction of a solar project. The protection measures should be planted ahead of any construction		Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. Since the Stage Two (statutory) consultation, the Applicant has undertaken further refinement of the Scheme design in line with the iterative design process. This has resulted in a number of reductions to the Scheme boundary, as detailed in ES Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. Notable areas of land removed from the Solar PV sites following statutory consultation are identified in that chapter, with all removals illustrated in ES Volume 2, Figure 4-2 and Figures 4-2-1 to 4-2-8 [EN010168/APP/6.2].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The total area of the Solar PV Sites (excluding the Cable Route Corridor) has reduced to 749 ha (from 878 ha at PEIR), while the Cable Route Corridor has been reduced from the larger Cable Route Search Corridor presented at PEIR to cover 462 ha (from 1,947 ha at PEIR). The statutory consultation included a preliminary design and assessment. The Development Consent Order (DCO) application includes the updated design and a thorough assessment of the impacts in the ES [EN010168/APP/6.1]. The Applicant is confident that the proposed mitigation measures set out in the ES are adequate and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [EN010168/APP/7.2]. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.

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LD2_PFF_212	Project description and DCO process	Q9 [comments on the assessment of potential effects / Environment] - The biggest impact on the environment will be the construction and similar destruction of community assets, roads and infrastructure, "the hidden costs" there have been no guarantees of financial redress if the plans are breached and no means of resulting the time lines.	No	Detailed management plans will be secured as part of the Development Consent Order (DCO) and need to be approved post consent by the local planning authority. These detailed management plans must substantially accord with the outline management plans developed as part of the DCO Application, meaning the Applicant will be legally required to implement mitigation which has been proposed.
LD2_PFF_212	Site selection and alternatives	Q10 [comments on the Cable Route Search Corridor] - The cable route is too long and too inefficient to sustain a scheme of this size. The scheme should be smaller and not connected to the grid at Melksham. The grid connection should be established by the developer ahead of construction	No	More information regarding how the site was selected can be found in Environmental Statement (ES) Volume 1 Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and Appendix 4-2: Site Selection Assessment Report [EN010168/APP/6.3]. Following discussions with National Grid, a grid connection was identified at Melksham which could provide capacity for a utility scale solar farm. The Applicant explored sites around Melksham which could provide sufficient land to utilise the grid connection capacity that was available (and therefore provide maximum benefits in terms of meeting the country's renewable energy needs). The search

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				area of 20km radius from Melksham Substation was established, which the Applicant considers to be a viable distance from the point of connection for a Scheme of this scale. The Site Selection Assessment Report [EN010168/APP/6.3] explains that the Applicant has assessed 10 potential development areas within a 20km search area from Existing Melksham Substation to confirm their suitability for the Scheme, including alternative sites closer to the Existing Melksham Substation. It also sets out the five-stage approach used to identify the potential development areas and explains how these have been assessed. Briefly, each of the 10 potential development areas has been assessed to further understand the development constraints of these areas. The evaluation has involved an assessment of the areas against a range of planning, environmental and operational considerations, including current land use (including use of best and most versatile agricultural land), the availability of the land, the ease of connecting the site back to Melksham Substation, and heritage and environmental constraints. Each potential

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				development area has been “scored” to understand which would be the most suitable for the Scheme. The Site Selection Assessment Report [EN010168/APP/6.3] concludes that the Solar PV Sites, on balance, offer the most suitable location for the Scheme.
LD2_PFF_212	Project description and DCO process	Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - Insufficient undertakings and lack of financial redress. The developers have little knowledge of the [illegible] technology and requirements nor of the maintenance obligations	No	The Applicant confirms that potential effects across all phases of the Scheme have been assessed in detail within the Environmental Statement (ES) [EN010168/APP/6.1] and management plans in the Development Consent Order (DCO) including consideration of mitigation measures where appropriate. The applicant is working with experienced contractors and technical specialists to ensure that the design, delivery, and long-term maintenance of the scheme meet established industry standards. Financial obligations, including decommissioning, will be secured through appropriate legal mechanisms as part of the consenting process.
LD2_PFF_212	Transport and access	Q12 [suggestions for on-site community benefits] - The immeasurable damage to the community is increased traffic and construction interference. Full mitigation of this can be achieved by dramatically reducing the scale and providing full compensation under a S.106 agreement	No	Proposed construction vehicle routes are set out in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and are illustrated in ES Volume 2, Figure 13-1: Study Area – Solar PV Sites [EN010168/APP/6.2] and ES Volume 2,

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				Figure 13-2: Study Area – Cable Route Corridor [EN010168/APP/6.2]. The construction vehicle routes are considered to be the most appropriate to access the Order Limits and will be controlled through the Construction Traffic Management Plan (CTMP) which will be prepared in substantial accord with the Outline CTMP [EN010168/APP/7.22] and secured as part of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Outside of the identified construction vehicle routes, there will not be transport and access effects.
LD2_PFF_212	Community benefits and impact	Q13 [suggestions for off-site community benefits] - Free power and compensation to all those persons affected within the area Q14 [Additional comments] -The main objection is scale and distance from Melksham. It is not local	No	Q14 The need for new low carbon generation capacity (including large-scale solar capacity) is urgent and unprecedented to slow climate change as set out in Section 3.6 of the Statement of Need [EN010168/APP/7.1]. However, the availability of locations which are appropriate for large-scale solar schemes are limited. Therefore, the Applicant has proposed a scheme which delivers the greatest possible decarbonisation and energy security benefits from the land and grid connection available to it.

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				While the Scheme is not located immediately adjacent to Melksham, the use of 400kV infrastructure ensures that power can be transmitted over long distances with negligible losses. The Scheme proposes to utilise the same approach used by National Grid across its wider network to support the delivery of secure, low-carbon energy at a national level.
LD2_PFF_183	Ecology and biodiversity	I walk daily along the top of the ridge looking down towards Doun Lane - this is an exceptionally unspoilt piece of countryside - you can see for miles. The farmland seems to be exceptionally valuable with cereal crops and grazing towards Corston. There is an abundance of mature oaks. The thought that these fields would be full of metal and concrete construction doesn't bear thinking about - my whole mental wellbeing would be entirely compromised. I have lived in the surrounding area for the best part of 40 years and am very familiar with the lie of the land, agricultural practices, weather patterns and its effect on the local landscape. The countryside around the proposed site is 'ordinary' English landscape - we have none	No	No ancient and/or veteran trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed in order to retain existing arboriculture features as far as practicable. Any unavoidable tree losses as a result of the Scheme will be suitably mitigated for. This is set out in Environmental Statement (ES) Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]. The Scheme has been designed to retain existing hedgerows and grassland habitats as far as practicable. Some loss of hedgerows will be required to provide new access and infrastructure. Anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits, and

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		of the dramatic skylines as seen in counties such as Yorkshire - but it is quintessential rural country supporting an abundance of wildlife - grey hare, partridge, deer, fox, badger and providing habitats for a huge variety of birds. The ground nesting birds - skylarks in particular, will be hugely impacted - not so much by their nest sites being compromised but by their ability to relocate once in the air as they will not be able to orient themselves especially given the enormity of the area covered. I have extensively researched this point and it appears that this has not been covered by your team.		planting of new hedgerows will far outweigh losses. Proposed new hedgerows are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]. Impacts on mental health and wellbeing are assessed in the ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of determinants of health, with mental health aspects to them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, community identity and culture, education and training, employment, climate change, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. In consultation with Wiltshire Council's Public Health Team, as documented in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [EN010168/APP/6.3], the Applicant has

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				explored ways to ensure members of impacted communities have access to mental health resources during and following the Development Consent Order (DCO) process should it be required or requested, and that the Applicant team will help to direct community members to existing resources operating in (NW) Wiltshire, using resources provided by Wiltshire Council's Public Health Team. Potential impacts of the Scheme are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. This assessment considers all phases of the Scheme, including the construction phase, and describes appropriate measures to avoid or mitigate identified impacts. The Applicant makes note of this comment. Ecological mitigation and enhancement measures for birds, including areas to be set aside for the benefit of ground-nesting birds (particularly skylark) are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], and are shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1].

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_PFF_136	Landscape and visual / Transport and access	Q4 [overall comments] - Landscape and Visual - No amount of planting will adequately mitigate the negative impact of the solar panels and associated infrastructure on the landscape. It will amount to a transition to an industrial landscape as opposed to a rural one. cumulative impact / clustering - this area of north Wiltshire has been targeted by developers of solar installations in the last 3 years we have seen planning approvals for large scale solar installations (Generally 49.9 [illegible]) at: Minety/Nanketon -Forest Gate - Leigh Delamere/Servington - Red Barn. The accommodation on so many solar developments in the area is disproportionate and is changing the character of the area to its detriment Q5 [comments on indicative masterplan] - the design of the development is flawed and thus its span will impact receptors in [illegible] of the consternations in and also around the development. It's a sketchy patch work of small developments that will require significant additional construction work to tie up the individual parts. Q7 [comments on the assessment of	No	The Applicant makes note of this comment. A full assessment of landscape and visual effects is provided in the LVIA , which describes the effect of proposed new planting. Refer to Environmental Statement Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). This will be a requirement of the Development Consent Order (DCO). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An outline CTMP will be submitted with the DCO. An Outline Construction Traffic Management Plan (CTMP) has been prepared and is available in DCO Volume 7 [EN010168/APP/7.22]. Each access along the cable route corridor will only be used for approximately 90 days. Therefore, any transport and access effects will be very short-term

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		potential effects / Landscape] - no amount of additional planting will hide the panels or battery facilities. Trees/hedges change with the seasons and [illegible] Q9 [comments on the assessment of potential effects / Environment] - the best thing you could do would be to find and [illegible] that will act as a adversely impacted by your proposals - so not a rural area that is so beautiful. Q10 [comments on the Cable Route Search Corridor] - the proposed cable route is possibly the most disruptive part of your development. the route will have to navigate the M4, A420, A4 and countless B routes and unclassified roads that link the towns and villages in the area. This development does not justify the level of disruption this will cause.		
LD2_PFF_139	Project description and DCO process	[other] - No consideration to impact on local residents as we are spread about Q4 [overall comments] - [Climate Change] - Phenomenol land miles transporting materials - diesel transport and lorries [Landscape and visual] - Along roads, clearly visible for miles and miles [Ecology and biodiversity] - Wildlife paths	No	The capacity of local roads/infrastructure to accommodate construction vehicles is assessed in Environmental Statement (ES) Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] , which concludes there are no significant adverse impacts. ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] also identifies

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		destroyed. Deer/badgers/foxes etc. [Hydrology] - Run off from panels will create channels adding to ground flooding [Cultural heritage] - These must not be disturbed in any way. National heritage [Transport and access] - Country roads are not intended for use by heavy plant in 1000's of journeys [Noise and vibration] - Pile driven into the ground. 1000s of impacts. ground vibration. [socio-economics] - The Cotswolds is an area of rural beauty. How can this be maintained when land covered by panels? [soils and agriculture] - Soil destroyed by toxic-metal, plastic, chemical, leaching deep into the ground [Human health] - No one knows how harmful being surround by toxins/electricity is. Do you?? [Ground conditions] - Soils destroyed by huge metal posts. [Cumulative effects] - Too many panels, too close over a huge area. Why? [Site Selection] - Enormous plan. Why not smaller sites serving communities, thus negating mega underground cables? The whole area will be taken over by heavy traffic and hgv's. They will destroy verges, cause traffic holdup increase journey times. There will be continuous noise of machinery during construction for 2 years! Local		specific highway improvement areas where traffic management or passing bays may be required on narrower sections of the construction routes. Construction vehicle movements will be managed through a Construction Traffic Management Plan (CTMP). The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. An Outline CTMP [EN010168/APP/7.22] has been prepared and submitted as part of the Development Consent Order (DCO). Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. A road condition/dilapidation survey of minor roads not typically used by HGV traffic forms a measure set out within the CTMP. Any damage in the verge or on carriageway road surface caused by construction vehicles will be rectified to the satisfaction of the local highway authority. There will also be a community liaison element of the CTMP to keep the local community informed on the construction process, and to provide a contact for feedback should any issues arise.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		residents will have no choice but to put up with it. They will be surrounded by 1000s of acres of industry, 5 1/2 days a week for 2 years with associated dust and mud. It is too big and the local villages will be swamped forever. No compensation is offered to the houses whose value will come tumbling down. Enough so that people can't even afford to move. Enough to destroy their pensions. Enough to ensure that old-age security is destroyed. Q5 [comments on indicative masterplan] - The whole thing is poorly thought out with the impact it will have on towns, villages, and homes. It is MUCH TOO BIG and MUCH TO CONCENTRATED. No-one minds smaller acreages. These can be concealed. These don't require mega underground cables and mega battery storage - health implications of living close to one? Studies on health? Dangers? Instead of blotting the landscape, work with it in smaller areas. Better still, use roofs. But that wouldn't be as profitable as using "ready prepared" farmland, would it? Size matters! Q6 [comments on design principles] -The whole design is flawed by virtue of its size,		The visual impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The scale of development within the red line boundary has significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) as part of the iterative design process, in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this reduction in the Scheme's red line boundary, panels along the edge of the Cotswold National Landscape and along the Fosse Way have been removed. Regarding landscape and visual impacts, the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. Specific mitigation measures and enhancement plans are included in the ES [EN010168/APP/6.1]. The Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18] provides details of

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		let alone the visibility. Q7 [comments on the assessment of potential effects / Landscape] - Driving along the Fosse way will be met with expansive views of solar panels higher bungalows. These cannot be hidden by hedges. Q8 [comments on the assessment of potential effects / Ecology] - You are destroying 1000s of acres of grasslands. You cannot replace this. [...] Q11 [comments on the assessment of potential effects during construction / operation / decommissioning] - With a industry of this size large-scale disruption is inevitable and unavoidable reinforced by the fact you will be enlarging roads! Q12 [suggestions for on-site community benefits] - Footpaths are used to enjoy the countryside. walking through solar fields boarded by high metal fencing and buzzing panels is not the same. permissive paths hardly compensate for loss of views during a "countryside" walk. It will be like walking		the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1], ES Volume 2: Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18] and the Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19]. The design will incorporate minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland and hedgerows, public rights of way and watercourses. Potential impacts of the Scheme are fully assessed in ES Volume 1, Chapter: Ecology and Biodiversity [EN010168/APP/6.1]. This assessment considers all phases of the Scheme, including the construction phase, and describes appropriate measures to avoid or mitigate identified impacts. Impacts on physical health and wellbeing are assessed in the Environmental Statement (ES) Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on a broad range of

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		through an industrial zone, which is exactly what it is [...]		determinants of health with physical health aspects to them. This includes assessment of impacts on access to housing, access to open and leisure space, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. Priority has been given in the assessment to the communities most immediately affected by the Scheme in the 2km Study Area surrounding the Scheme. A detailed assessment of the likely significance of effects of the Scheme on the use and desirability of PROWs, permissive routes and long-distance recreational routes has been included in the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] with assessment of individual routes and receptors in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3]. The assessment identifies potential for some significant adverse effects during construction, peak replacement works and decommissioning. The Scheme seeks to minimise disruption to the use of PROWs during construction. Diversions or closures to facilitate construction works will only be undertaken

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				where necessary and will be temporary in nature with signage and prior notice provided as set out and secured through the Outline PROWMP [EN010168/APP/7.17]. During the Scheme's operation, the routing of all PRoWs is preserved. PRoWs will also be given a minimum 15m setback to the nearest solar PV structures, with 2.5m deerstock fencing set approximately 10m from the PRoW centreline. Where PRoWs run along hedgerows, the hedgerows will be retained. PRoWs will be kept clear with surrounding areas planted only with low-level groundcover (such as wildflower meadow mix) to retain a more open aspect along PRoWs. Additional landscape and ecological enhancement planting with help to visually separate recreational users from onsite infrastructure. The Outline PROWMP [EN010168/APP/7.17] requires the reinstatement of any PRoW furniture, enclosures, and surface treatments where they are altered or damaged by construction activities. The Applicant is also open to exploration of improvements to PRoW access through removal of stiles and gates to create better access for

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				PRoW users without encouraging nuisance behaviour. This is likely to be delivered through the Community Benefit Fund in coordination with Wiltshire Council's Public Rights of Way Team.
LD2_PFF_139	Other Environmental Matters (Waste) / Soils and Agriculture (Ground Conditions)	[...] Q9 [comments on the assessment of potential effects / Environment] - Clearly you are destroying 1000s acres of farmland. You cannot hide this fact by window-dressing. The panels themselves are not environmentally friendly. Are they recyclable? What chemicals leach out of subterranean pillars? What chemical leak out of compromised panel surfaces that will find their way into our water? How harmful is it to be surrounded by electro-power, overground, underground? By air? What studies are there to prove there is no	No	As outlined in Environmental Statement (ES) Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] , Materials and Waste section due to market and policy trends it is assumed that specialist regional or national facilities would be in place at the time of component replacement and decommissioning, and these would be developed in response to demand generated by the UK-wide solar PV panel industry and waste components would be reused, recycled, or recovered and not disposed of to landfill.

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		damage or danger to health? Q10 [comments on the Cable Route Search Corridor] - More destruction of land with the burial of 1000s of tons of metals, plastics. Destroy 1000s of acres for its residents who won't benefit. [...]		As outlined in Outline Decommissioning Strategy (DS) in Development Consent Order (DCO) Volume 7 [EN010168/APP/7.14], the mode of the Interconnecting Cables and Grid Connection Cables decommissioning would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the Grid Connection Cables. Materials used in the solar arrays are designed not to leach or emit harmful chemicals. No PFAS coatings will be applied to solar panels. In situations where risk of chemical release needs to be managed, such as the use of fluids in Horizontal Directional Drilling, a suitable risk assessment will be undertaken on a location-specific basis, as outlined in the

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				Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12]. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Table 17.6 shows that most of the agricultural land in the Solar PV sites (477.4 ha or 67% of the total) is not BMV land. There is no excellent quality Grade 1 land, 30.8 ha (4%) of very good quality Grade 2 land and 209.3 ha (29%) of good quality land. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] sets out the methodology for site selection, including brownfield sites, and alternative layouts, as well as for alternative cable route corridors, alternative sites for the BESS and alternative construction compounds (in addition to alternative technologies). The

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				Applicant has considered ALC grade in its site selection for the Scheme, seeking to avoid BMV land when assessing appropriate sites. The Applicant notes this comment. The effects of EMF from the Scheme are assessed in ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] Section 20.6. The assessment concludes that no significant impacts are likely as a result of any of the Schemes infrastructure and that any levels of EMF radiation are below the International Commission on Non-Ionizing Radiation Protection reference levels.
LD2_PFF_139	Community benefits and impact	[...] Q13 [suggestions for off-site community benefits] - Compensation to individuals to mitigate loss of value in residential properties. As far as I can tell "donations" "might" benefit villages. What about individual homes out of villages? Don't they count? Q14 [Additional comments] - Rotating panels will have motors. These generate noise.	No	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing

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		There will be 1000s. None during all daylight hours. Cooling fans? Are these silent? Reflection - a shiney surface will effect, regardless of colour. A dark surface will absorb and generate heat.		biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The noise and vibration impact from construction are assessed in Section 14.10 of Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. As a reasonable worst-case piling has been assumed as being required. The mitigation measures associated with construction activity are presented in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and committed to in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] which is secured

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				through the draft Development Consent Order (DCO) [EN010168/APP/3.1]. With these measures in place no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme are assessed in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] with supporting information supplied in ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]. A penalty has been applied to the noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and with such measures in place significant effects from operational noise are not expected. The Outline Operational Environmental Management Plan [EN010168/APP/7.13] which is secured through the draft DCO [EN010168/APP/3.1] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides

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				reassurance that significant effects from noise will be avoided while also allowing some flexibility on how this is achieved. ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] presents an assessment of Glint and Glare from the Scheme on surrounding receptors (including rail, roads, residential properties, aerodromes, PRoWs and the CNL). The assessment concludes that with the implementation of mitigation measures such as use of 2.5m fixed panels where required no significant effects are predicted as a result of the Scheme.
LD2_PFF_240	Project description and DCO process	Do not support.	No	The Applicant makes note of this comment.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
LD2_CLE_466	Project Description and DCO process / Site selection and alternatives	Your letter to me of 16 April 2025 ref 23008104_325825 encourages me to give feedback up until 29 May 2025. The LimeDown scheme should be refused permission. The development is an industrial-scale rape of beautiful countryside needed to grow food. Solar is a technology not best suited to Britain and will very soon be superseded. Apparently we are country 199 of 200 for obtaining benefit from solar. Claims made in the consultation documents for minimising impact and reinstatement are simply untrue. Once built, the solar farm will blight the countryside for 60 years, after which the damaged fields it leaves behind will be used for housing. The effects of noise and light pollution will reduce visitor numbers to the area and spoil the peacefulness enjoyed by many. Solar power is not cheap when the generous taxpayer subsidies are taken into account. Newer technologies will very soon make this scheme an expensive millstone round our	No	The justification for use of solar is laid out in Environmental Statement (ES) Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1]. There is an urgent need to generate electricity using renewable and low carbon sources to provide sufficient reliable, affordable sources of electricity. Solar is a quick, cheap and enduring technology which can be deployed in order to meet this growing demand while bringing forward decarbonisation, energy security and affordability benefits to consumers. Solar generation is deployable globally. While other countries may, according to the World Bank report, be <i>more</i> suitable for solar development than the UK, (a) any development outside of the UK will need to be linked to the UK grid to contribute to a reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it does not follow that although other countries may be 'more suitable', the UK is 'unsuitable' on an absolute scale for solar development. Government's view is that electricity supply in 2050 will largely comprise of wind and solar.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		necks. Buying the solar panels gives profit to a country that is not a friend to Britain and may well be using slave labour. The power loss on the lengthy cable run to Melksham means the country will not before as much as proposed from this project, yet the high cost of subsidy by the taxpayer will be carried for 60 years, and the countryside destroyed for ever.		Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement. The effects of Noise and Vibration have been assessed within ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. As stated above, solar is a cost effective solution to meet the UKs net zero targets. The Applicant recognises the concerns regarding the supply chain for solar panels, particularly the issues of modern slavery and human rights violations. However, the Applicant are committed to ethical sourcing and are active supporters of the Solar Stewardship Initiative (SSI), a solar-specific supply chain assurance scheme. The SSI has established a comprehensive environmental, social, and governance standard aimed at promoting a responsible, transparent, and sustainable

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				value chain. To uphold these principles, the Applicant will prioritize using PV modules from manufacturers that adhere to the SSI Standards, ensuring that our supply chain is free from forced labour and other unethical practices. The applicant confirms that electrical losses on a 400kV single circuit are minimal, even over long distances. This is due to the high transmission voltage, which significantly reduces losses. The same type of infrastructure is used across National Grid's 400kV network, specifically designed to transmit high volumes of power efficiently from point to point while maintaining system reliability and performance.
LD2_CLE_466	Consultation and engagement	THE CONSULTATIONS Several solar farms already have consent in this area. The LD proposals take no account of the contagion in the area of all this development, pretending it is the only scheme.	No	The Applicant makes note of this comment. As part of the Environmental Information Assessment (EIA) process, the Applicant prepared a Preliminary Environmental Information Report (PEIR) Chapter examining Cumulative and In-Combination

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Staff at the consultations have said things that are not true, often fail to answer questions satisfactorily, and do not follow up promises made. My key example would be that you as project manager categorically stated the company has the right status to enter and survey my land without my permission, and said you would confirm this in writing. No such confirmation has been received. For some time an incorrect map of the cable corridor has been up on the internet. Staff refused to believe this at the consultation venue, but the incorrect map was taken down the next day. The replaced map did not show a complete cable corridor so it was impossible to gauge its validity. At 12th May there is still no map on the LD website of the proposed cable corridor around Surrendell Farm. There is a gap between the bottom of map 8-15-3 LD C and the development as shown on map 8-1-6. It is implied the cable must come through an area near Surrendell Farm but not clear where or how.		Effects, which has been further developed in the Environmental Statement (ES) [EN010168/APP/6.1] submitted as part of the Development Consent Order (DCO). These assessments are intended to determine the potential for effect and interactions and cumulative effects as a result of the Scheme. This includes assessment of effects arising from the Scheme in combination with other proposed schemes (inter-project effects) and is based upon a review of planning applications submitted. Regarding access, the applicant confirmed at the in-person referenced, that should access need to be taken on any land interest, and a voluntary agreement could not be reached, that the applicant does hold compulsory powers to obtain access via a s172. As access to the property has not been required, no correspondence has been issued. The Applicant did not publish an incorrect map of the Cable Route Search Corridor on the Scheme website during the statutory consultation period and did not remove or replace any maps following receipt of this comment at the information

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Perhaps this is because of the historical features of tumuli and cromlech, the possible site of a roman villa, English Civil War burial sites and the protected field covering the remains of the church, graveyard and village of Surrendell, not taken account of. The consultations have taken every opportunity to minimise or obscure the blight the proposals threaten, omitting detail that might be objected to, and therefore have not been carried out properly. ██████████		event held at Luckington Village Hall on 15 February 2025. The Applicant fulfilled the stakeholder's subsequent request for hard copies of the relevant maps, posting A3 copies of PEIR Vol 2 Figures 8-15-1 through 8-15-5 and PEIR Vol 2 Figures 8-1-6 through 8-1-8. To note, the Applicant did identify an error in the Cable Route Search Corridor shown in mapping included in the Newsletter issued to the Core Consultation Zone (CCZ) before the start of the statutory consultation. The Applicant rectified this error on 28 January 2025 (before the start of the statutory consultation on 29 January 2025) by ensuring all documents uploaded to the Scheme website correctly showed the Cable Route Search Corridor in line with the materials produced for the PEIR. The Applicant engaged directly with the landowner(s) whose property was incorrectly included to explain the error and provide reassurance the property wasn't included as part of the proposals at that stage. The Applicant also issued a follow up letter to all addresses within the CCZ on 17 February 2025 to remind stakeholders of the ongoing consultation and provide a revised version of the relevant map, stating: "<i>This map shows an</i>

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				<i>Indicative Masterplan of our revised proposals at this stage. This was previously sent to you in our Consultation Leaflet in January 2025 and includes a minor correction, involving the removal of a small parcel of land incorrectly included within the Cable Route Search Corridor. More detailed maps can be found on the Project website: www.limedownsolar.com or by getting in touch with the Project team directly."</i> The map showing the area of the proposed Cable Route Search Corridor near Surrendell Farm (between Lime Down C as shown in PEIR Vol 2 Figure 8-15-3 and Figure 8-1-6) can be found in PEIR Vol 2 Figure 8-1-3. At the start of the statutory consultation on 29 January 2025, the Applicant made this map available as part of the PEIR which was available online via the Scheme website and in hard copy at CAP sites. The PEIR was available at all in-person information events for the public to access with Scheme team members present for any questions. This included PEIR Chapter 12: Cultural Heritage which set out all findings to date relating to heritage assets in the area, such as Listed Buildings, Conservation Areas and

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				Scheduled Monuments. Detailed ground investigation and archaeological surveys have been carried out to ensure that any assets are protected and avoided during the construction phase of the Scheme and field walking and a geo-physical survey of the entire Scheme area have also been undertaken to get a better understanding of the potential for buried archaeology. Findings are set out in the ES Chapter 12: Cultural Heritage [EN010168/APP/6.1] .
LD2_L_012	Project Description and DCO process / Site selection and alternatives	Your letter to me of 16 April 2025 ref 23008104_325825 encourages me to give feedback up until 29 May 2025. The LimeDown scheme should be refused permission. The development is an industrial-scale rape of beautiful countryside needed to grow food. Solar is a technology not best suited to Britain and will very soon be superseded. Apparently we are country 199 of 200 for obtaining benefit from solar. Claims made in the consultation documents for minimising impact and reinstatement are simply untrue. Once built, the solar farm will blight the countryside for 60 years, after which the damaged fields it leaves behind	No	The justification for use of solar is laid out in Environmental Statement (ES) Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1]. There is an urgent need to generate electricity using renewable and low carbon sources to provide sufficient reliable, affordable sources of electricity. Solar is a quick, cheap and enduring technology which can be deployed in order to meet this growing demand while bringing forward decarbonisation, energy security and affordability benefits to consumers. Solar generation is deployable globally. While other countries may, according to the World Bank report, be <i>more</i> suitable for solar development than the UK, (a) any development outside of the UK will need to be linked to the UK grid to contribute to a

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		will be used for housing. The effects of noise and light pollution will reduce visitor numbers to the area and spoil the peacefulness enjoyed by many. Solar power is not cheap when the generous taxpayer subsidies are taken into account. Newer technologies will very soon make this scheme an expensive millstone round our necks. [REDACTED] [REDACTED] [REDACTED] The power loss on the lengthy cable run to Melksham means the country will not before as much as proposed from this project, yet the high cost of subsidy by the taxpayer will be carried for 60 years, and the countryside destroyed for ever.		reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it does not follow that although other countries may be 'more suitable', the UK is 'unsuitable' on an absolute scale for solar development. Government's view is that electricity supply in 2050 will largely comprise of wind and solar. Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement. The effects of Noise and Vibration have been assessed within ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. As stated above, solar is a cost effective solution to meet the UKs net zero targets. The Applicant recognises the concerns

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				regarding the supply chain for solar panels, particularly the issues of modern slavery and human rights violations. Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that our supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source our panels from factories that are SSI-accredited. The SSI has established a comprehensive environmental, social, and governance standard aimed at promoting a responsible, transparent, and sustainable value chain. To uphold these principles, the Applicant will prioritize using PV modules from manufacturers that adhere to the SSI Standards, ensuring that our supply chain is free from forced labour and other unethical practices.
LD2_L_012	Consultation and engagement	THE CONSULTATIONS Several solar farms already have consent in this area. The LD proposals take no account of the contagion in the area of all this	No	The Applicant makes note of this comment. As part of the Environmental Information Assessment (EIA) process, the Applicant

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		development, pretending it is the only scheme. Staff at the consultations have said things that are not true, often fail to answer questions satisfactorily, and do not follow up promises made. My key example would be that you as project manager categorically stated the company has the right status to enter and survey my land without my permission, and said you would confirm this in writing. No such confirmation has been received. For some time an incorrect map of the cable corridor has been up on the internet. Staff refused to believe this at the consultation venue, but the incorrect map was taken down the next day. The replaced map did not show a complete cable corridor so it was impossible to gauge its validity. At 12th May there is still no map on the LD website of the proposed cable corridor around Surrendell Farm. There is a gap between the bottom of map 8-15-3 LD C and the development as shown on map 8-1-6. It is implied the cable must come through an area near Surrendell Farm but not clear where or how.		prepared a Preliminary Environmental Information Report (PEIR) Chapter examining Cumulative and In-Combination Effects, which has been further developed in the Environmental Statement (ES) [EN010168/APP/6.1] submitted as part of the Development Consent Order (DCO). These assessments are intended to determine the potential for effect and interactions and cumulative effects as a result of the Scheme. This includes assessment of effects arising from the Scheme in combination with other proposed schemes (inter-project effects) and is based upon a review of planning applications submitted. Regarding access, the applicant confirmed at the in-person referenced, that should access need to be taken on any land interest, and a voluntary agreement could not be reached, that the applicant does hold compulsory powers to obtain access via a s172. As access to the property has not been required, no correspondence has been issued. The Applicant did not publish an incorrect map of the Cable Route Search Corridor on the Scheme website during the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		Perhaps this is because of the historical features of tumuli and cromlech, the possible site of a roman villa, English Civil War burial sites and the protected field covering the remains of the church, graveyard and village of Surrendell, not taken account of. The consultations have taken every opportunity to minimise or obscure the blight the proposals threaten, omitting detail that might be objected to, and therefore have not been carried out properly.		statutory consultation period and did not remove or replace any maps following receipt of this comment at the information event held at Luckington Village Hall on 15 February 2025. The Applicant fulfilled the stakeholder's subsequent request for hard copies of the relevant maps, posting A3 copies of PEIR Vol 2 Figures 8-15-1 through 8-15-5 and PEIR Vol 2 Figures 8-1-6 through 8-1-8. To note, the Applicant did identify an error in the Cable Route Search Corridor shown in mapping included in the Newsletter issued to the Core Consultation Zone (CCZ) before the start of the statutory consultation. The Applicant rectified this error on 28 January 2025 (before the start of the statutory consultation on 29 January 2025) by ensuring all documents uploaded to the Scheme website correctly showed the Cable Route Search Corridor in line with the materials produced for the PEIR. The Applicant engaged directly with the landowner(s) whose property was incorrectly included to explain the error and provide reassurance the property wasn't included as part of the proposals at that stage. The Applicant also issued a follow up letter to all addresses within the CCZ on 17 February 2025 to remind

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				stakeholders of the ongoing consultation and provide a revised version of the relevant map, stating: <i>"This map shows an Indicative Masterplan of our revised proposals at this stage. This was previously sent to you in our Consultation Leaflet in January 2025 and includes a minor correction, involving the removal of a small parcel of land incorrectly included within the Cable Route Search Corridor. More detailed maps can be found on the Project website: www.limedownsolar.com or by getting in touch with the Project team directly."</i> The map showing the area of the proposed Cable Route Search Corridor near Surrendell Farm (between Lime Down C as shown in PEIR Vol 2 Figure 8-15-3 and Figure 8-1-6) can be found in PEIR Vol 2 Figure 8-1-3. At the start of the statutory consultation on 29 January 2025, the Applicant made this map available as part of the PEIR which was available online via the Scheme website and in hard copy at CAP sites. The PEIR was available at all in-person information events for the public to access with Scheme team members present for any questions. This included PEIR Chapter 12: Cultural Heritage which

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				set out all findings to date relating to heritage assets in the area, such as Listed Buildings, Conservation Areas and Scheduled Monuments. Detailed ground investigation and archaeological surveys have been carried out to ensure that any assets are protected and avoided during the construction phase of the Scheme and field walking and a geo-physical survey of the entire Scheme area have also been undertaken to get a better understanding of the potential for buried archaeology. Findings are set out in the ES Chapter 12: Cultural Heritage [EN010168/APP/6.1] .
LD2_L_013	Project Description and DCO process / Site selection and alternatives	Your letter to me of 16 April 2025 ref 23008104_325825 encourages me to give feedback up until 29 May 2025. The LimeDown scheme should be refused permission. The development is an industrial-scale [REDACTED] of beautiful countryside needed to grow food. Solar is a technology not best suited to Britain and will very soon be superseded. Apparently we are country 199 of 200 for obtaining benefit from solar. Claims made in the consultation documents for minimising impact and reinstatement are	No	The justification for use of solar is laid out in Environmental Statement (ES) Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1] . There is an urgent need to generate electricity using renewable and low carbon sources to provide sufficient reliable, affordable sources of electricity. Solar is a quick, cheap and enduring technology which can be deployed in order to meet this growing demand while bringing forward decarbonisation, energy security and affordability benefits to consumers. Solar generation is deployable globally. While other countries may, according to the World Bank report, be <i>more</i> suitable for

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		simply untrue. Once built, the solar farm will blight the countryside for 60 years, after which the damaged fields it leaves behind will be used for housing. The effects of noise and light pollution will reduce visitor numbers to the area and spoil the peacefulness enjoyed by many. Solar power is not cheap when the generous taxpayer subsidies are taken into account. Newer technologies will very soon make this scheme an expensive millstone round our necks. The power loss on the lengthy cable run to Melksham means the country will not before as much as proposed from this project, yet the high cost of subsidy by the taxpayer will be carried for 60 years, and the countryside destroyed for ever.		solar development than the UK, (a) any development outside of the UK will need to be linked to the UK grid to contribute to a reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it does not follow that although other countries may be 'more suitable', the UK is 'unsuitable' on an absolute scale for solar development. Government's view is that electricity supply in 2050 will largely comprise of wind and solar. Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement. The effects of Noise and Vibration have been assessed within ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. As stated above, solar is a cost effective solution to meet the UKs net zero targets.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The Applicant recognises the concerns regarding the supply chain for solar panels, particularly the issues of modern slavery and human rights violations. Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that our supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source our panels from factories that are SSI-accredited.
LD2_L_013	Consultation and engagement	THE CONSULTATIONS Several solar farms already have consent in this area. The LD proposals take no account of the contagion in the area of all this development, pretending it is the only scheme. Staff at the consultations have said things that are not true, often fail to answer questions satisfactorily, and do not follow up promises made. My key example would be that you as project manager categorically	No	The Applicant makes note of this comment. As part of the Environmental Information Assessment (EIA) process, the Applicant prepared a Preliminary Environmental Information Report (PEIR) Chapter examining Cumulative and In-Combination Effects, which has been further developed in the Environmental Statement (ES) [EN010168/APP/6.1] submitted as part of the Development Consent Order (DCO). These assessments are intended to

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		stated the company has the right status to enter and survey my land without my permission, and said you would confirm this in writing. No such confirmation has been received. For some time an incorrect map of the cable corridor has been up on the internet. Staff refused to believe this at the consultation venue, but the incorrect map was taken down the next day. The replaced map did not show a complete cable corridor so it was impossible to gauge its validity. At 12th May there is still no map on the LD website of the proposed cable corridor around Surrendell Farm. There is a gap between the bottom of map 8-15-3 LD C and the development as shown on map 8-1-6. It is implied the cable must come through an area near Surrendell Farm but not clear where or how. Perhaps this is because of the historical features of tumuli and cromlech, the possible site of a roman villa, English Civil War burial sites and the protected field covering the remains of the church, graveyard and village of Surrendell, not taken account of.		determine the potential for effect and interactions and cumulative effects as a result of the Scheme. This includes assessment of effects arising from the Scheme in combination with other proposed schemes (inter-project effects) and is based upon a review of planning applications submitted. Regarding access, the applicant confirmed at the in-person referenced, that should access need to be taken on any land interest, and a voluntary agreement could not be reached, that the applicant does hold compulsory powers to obtain access via a s172. As access to the property has not been required, no correspondence has been issued. The Applicant did not publish an incorrect map of the Cable Route Search Corridor on the Scheme website during the statutory consultation period and did not remove or replace any maps following receipt of this comment at the information event held at Luckington Village Hall on 15 February 2025. The Applicant fulfilled the stakeholder's subsequent request for hard copies of the relevant maps, posting A3 copies of PEIR Vol 2 Figures 8-15-1

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		The consultations have taken every opportunity to minimise or obscure the blight the proposals threaten, omitting detail that might be objected to, and therefore have not been carried out properly.		through 8-15-5 and PEIR Vol 2 Figures 8-1-6 through 8-1-8. To note, the Applicant did identify an error in the Cable Route Search Corridor shown in mapping included in the Newsletter issued to the Core Consultation Zone (CCZ) before the start of the statutory consultation. The Applicant rectified this error on 28 January 2025 (before the start of the statutory consultation on 29 January 2025) by ensuring all documents uploaded to the Scheme website correctly showed the Cable Route Search Corridor in line with the materials produced for the PEIR. The Applicant engaged directly with the landowner(s) whose property was incorrectly included to explain the error and provide reassurance the property wasn't included as part of the proposals at that stage. The Applicant also issued a follow up letter to all addresses within the CCZ on 17 February 2025 to remind stakeholders of the ongoing consultation and provide a revised version of the relevant map, stating: <i>"This map shows an Indicative Masterplan of our revised proposals at this stage. This was previously sent to you in our Consultation Leaflet in January 2025 and includes a minor correction, involving the removal of a</i>

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				<i>small parcel of land incorrectly included within the Cable Route Search Corridor. More detailed maps can be found on the Project website: www.limedownsolar.com or by getting in touch with the Project team directly."</i> The map showing the area of the proposed Cable Route Search Corridor near Surrendell Farm (between Lime Down C as shown in PEIR Vol 2 Figure 8-15-3 and Figure 8-1-6) can be found in PEIR Vol 2 Figure 8-1-3. At the start of the statutory consultation on 29 January 2025, the Applicant made this map available as part of the PEIR which was available online via the Scheme website and in hard copy at CAP sites. The PEIR was available at all in-person information events for the public to access with Scheme team members present for any questions. This included PEIR Chapter 12: Cultural Heritage which set out all findings to date relating to heritage assets in the area, such as Listed Buildings, Conservation Areas and Scheduled Monuments. Detailed ground investigation and archaeological surveys have been carried out to ensure that any assets are protected and avoided during the construction phase of the Scheme and

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				field walking and a geo-physical survey of the entire Scheme area have also been undertaken to get a better understanding of the potential for buried archaeology. Findings are set out in the ES Chapter 12: Cultural Heritage [EN010168/APP/6.1] .
LD2_L_014	Project Description and DCO process / Site selection and alternatives	Your letter to me of 16 April 2025 ref 23008104_325825 encourages me to give feedback up until 29 May 2025. The LimeDown scheme should be refused permission. The development is an industrial-scale [REDACTED] of beautiful countryside needed to grow food. Solar is a technology not best suited to Britain and will very soon be superseded. Apparently we are country 199 of 200 for obtaining benefit from solar. Claims made in the consultation documents for minimising impact and reinstatement are simply untrue. Once built, the solar farm will blight the countryside for 60 years, after which the damaged fields it leaves behind will be used for housing. The effects of noise and light pollution will reduce visitor numbers to the area and spoil	No	The justification for use of solar is laid out in Environmental Statement (ES) Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1]. There is an urgent need to generate electricity using renewable and low carbon sources to provide sufficient reliable, affordable sources of electricity. Solar is a quick, cheap and enduring technology which can be deployed in order to meet this growing demand while bringing forward decarbonisation, energy security and affordability benefits to consumers. Solar generation is deployable globally. While other countries may, according to the World Bank report, be <i>more</i> suitable for solar development than the UK, (a) any development outside of the UK will need to be linked to the UK grid to contribute to a reduction in UK carbon emissions and support the delivery of a secure energy system, and (b) it does not follow that although other countries may be 'more suitable', the UK is 'unsuitable' on an

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		the peacefulness enjoyed by many. Solar power is not cheap when the generous taxpayer subsidies are taken into account. Newer technologies will very soon make this scheme an expensive millstone round our necks. [REDACTED] [REDACTED] [REDACTED] The power loss on the lengthy cable run to Melksham means the country will not before as much as proposed from this project, yet the high cost of subsidy by the taxpayer will be carried for 60 years, and the countryside destroyed for ever.		absolute scale for solar development. Government's view is that electricity supply in 2050 will largely comprise of wind and solar. Subject to the Scheme being consented, the Development Consent Order (DCO) that it is granted becomes a statutory instrument written into law. This means all the requirements contained within the DCO are legally binding. Subject to consent being granted the DCO stating that the land is returned to its original use would therefore be a legal requirement. The effects of Noise and Vibration have been assessed within ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. As stated above, solar is a cost effective solution to meet the UKs net zero targets. The Applicant recognises the concerns regarding the supply chain for solar panels, particularly the issues of modern slavery and human rights violations. However, the Applicant are committed to ethical sourcing and are active supporters

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				of the Solar Stewardship Initiative (SSI), a solar-specific supply chain assurance scheme. The SSI has established a comprehensive environmental, social, and governance standard aimed at promoting a responsible, transparent, and sustainable value chain. To uphold these principles, the Applicant will prioritize using PV modules from manufacturers that adhere to the SSI Standards, ensuring that our supply chain is free from forced labour and other unethical practices.
LD2_L_014	Consultation and engagement	THE CONSULTATIONS Several solar farms already have consent in this area. The LD proposals take no account of the contagion in the area of all this development, pretending it is the only scheme. Staff at the consultations have said things that are not true, often fail to answer questions satisfactorily, and do not follow up promises made. My key example would be that you as project manager categorically stated the company has the right status to enter and survey my land without my permission, and said you would confirm this in writing. No such confirmation has been	No	The Applicant makes note of this comment. As part of the Environmental Information Assessment (EIA) process, the Applicant prepared a Preliminary Environmental Information Report (PEIR) Chapter examining Cumulative and In-Combination Effects, which has been further developed in the Environmental Statement (ES) [EN010168/APP/6.1] submitted as part of the Development Consent Order (DCO). These assessments are intended to determine the potential for effect and interactions and cumulative effects as a result of the Scheme. This includes assessment of effects arising from the

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		received. For some time an incorrect map of the cable corridor has been up on the internet. Staff refused to believe this at the consultation venue, but the incorrect map was taken down the next day. The replaced map did not show a complete cable corridor so it was impossible to gauge its validity. At 12th May there is still no map on the LD website of the proposed cable corridor around Surrendell Farm. There is a gap between the bottom of map 8-15-3 LD C and the development as shown on map 8-1-6. It is implied the cable must come through an area near Surrendell Farm but not clear where or how. Perhaps this is because of the historical features of tumuli and cromlech, the possible site of a roman villa, English Civil War burial sites and the protected field covering the remains of the church, graveyard and village of Surrendell, not taken account of. The consultations have taken every opportunity to minimise or obscure the blight the proposals threaten, omitting detail that		Scheme in combination with other proposed schemes (inter-project effects) and is based upon a review of planning applications submitted. Regarding access, the applicant confirmed at the in-person referenced, that should access need to be taken on any land interest, and a voluntary agreement could not be reached, that the applicant does hold compulsory powers to obtain access via a s172. As access to the property has not been required, no correspondence has been issued. The Applicant did not publish an incorrect map of the Cable Route Search Corridor on the Scheme website during the statutory consultation period and did not remove or replace any maps following receipt of this comment at the information event held at Luckington Village Hall on 15 February 2025. The Applicant fulfilled the stakeholder's subsequent request for hard copies of the relevant maps, posting A3 copies of PEIR Vol 2 Figures 8-15-1 through 8-15-5 and PEIR Vol 2 Figures 8-1-6 through 8-1-8. To note, the Applicant did identify an error in the Cable Route Search Corridor shown in mapping

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		might be objected to, and therefore have not been carried out properly. ██████████		included in the Newsletter issued to the Core Consultation Zone (CCZ) before the start of the statutory consultation. The Applicant rectified this error on 28 January 2025 (before the start of the statutory consultation on 29 January 2025) by ensuring all documents uploaded to the Scheme website correctly showed the Cable Route Search Corridor in line with the materials produced for the PEIR. The Applicant engaged directly with the landowner(s) whose property was incorrectly included to explain the error and provide reassurance the property wasn't included as part of the proposals at that stage. The Applicant also issued a follow up letter to all addresses within the CCZ on 17 February 2025 to remind stakeholders of the ongoing consultation and provide a revised version of the relevant map, stating: <i>"This map shows an Indicative Masterplan of our revised proposals at this stage. This was previously sent to you in our Consultation Leaflet in January 2025 and includes a minor correction, involving the removal of a small parcel of land incorrectly included within the Cable Route Search Corridor. More detailed maps can be found on the Project website: www.limedownsolar.com</i>

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				<i>or by getting in touch with the Project team directly."</i> The map showing the area of the proposed Cable Route Search Corridor near Surrendell Farm (between Lime Down C as shown in PEIR Vol 2 Figure 8-15-3 and Figure 8-1-6) can be found in PEIR Vol 2 Figure 8-1-3. At the start of the statutory consultation on 29 January 2025, the Applicant made this map available as part of the PEIR which was available online via the Scheme website and in hard copy at CAP sites. The PEIR was available at all in-person information events for the public to access with Scheme team members present for any questions. This included PEIR Chapter 12: Cultural Heritage which set out all findings to date relating to heritage assets in the area, such as Listed Buildings, Conservation Areas and Scheduled Monuments. Detailed ground investigation and archaeological surveys have been carried out to ensure that any assets are protected and avoided during the construction phase of the Scheme and field walking and a geo-physical survey of the entire Scheme area have also been undertaken to get a better understanding of the potential for buried archaeology.

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				Findings are set out in the ES Chapter 12: Cultural Heritage [EN010168/APP/6.1] .
LD2_FFD_414	Project description and DCO process.	"Food Security, LVIA, the wrong site in then wrong location. MNR and Hydrogen is now the knew technology and a lot more efficient.The key issue is food security. The United Kingdom is only 46% self-sufficient in food and we are the third largest importers of food after China and Japan. With our population having recently experienced exponential growth and projected to expand yet further by several millions, it is simply mad to carpet large areas of the country with solar panels, 2,200 acres in this case. Agricultural land needs to be preserved for the express purpose of providing our people with food. 30% of the land which Island Green Power intends to cover with solar panels is classed as among the 'best and most versatile' which means it will be removed from agricultural production for at least 60 years. Only 26% of the land is assessed as being of poor quality." [REDACTED] [REDACTED] [REDACTED] [REDACTED]		Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that

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		[REDACTED] [REDACTED] [REDACTED] [REDACTED] Ownership is a material consideration. We have witnessed the negative impact of foreign owned companies on the UK. Thames Water, in which it seems that through a convoluted ownership structure Australia's Macquarie Asset Management is a key shareholder, has been driven to near-bankruptcy whilst other British utilities and companies have been acquired by foreign companies which have raised huge debt to finance the acquisition of the company. Island Power Group is not a British company; it is registered in an offshore tax haven; and its directors are largely non-British (ownership appears to be split 50:50 between Irish interests and Macquarie) with foreign politicians on the board who cannot be expected to take into consideration the British national interest. According to Companies House, the company's UK office appears to be located at an accommodation address in London with no major office in the UK at all. Profits from this huge and intrusive development will accrue to		established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. In terms of the Landscape and Visual impact of the Scheme, this has been assessed in Environmental Statement (ES) Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. Mitigation measures such as planting have been embedded into the design of the Scheme to reduce the visual impact. In response to the comment that no alternative sites have been considered, as set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no obviously more suitable locations within the 20km search area than the proposed location for the Scheme.

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		shareholders overseas. I question whether this grotesque despoliation of the landscape will have any personal impact on any of the principal promoters of the scheme. Significantly, Ireland has just 13 solar 'farms' whilst the UK already has more than 100 times as many. Why have the Irish promoters of this scheme not concentrated on their homeland instead of seeking to exploit a heavily subsidised business in our country? These are critically important issues specific to this proposed project, but other issues are also relevant. The proposed 1,000,000 panels are huge and will be visible for miles around, despoiling a predominantly rural landscape, whilst the battery stations will create a permanent intrusive industrial noise. Whilst fires at such facilities are not (yet) frequent, when they occur the effect can be devastating on local communities. The company's promotional literature has pictures of glorious unspoilt fields, as they look today, not as they will look after being carpeted with 1 million 13 foot high panels. Furthermore, the company's claim to 'mitigate' this effect will represent meagre compensation for the intrusion, noise, loss of landscape, reduction in property values etc		In terms of the suggestion that alternative technologies are more efficient than solar, this is considered within ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Soils and Agriculture. BMV land was a key consideration in the site selection process, with details set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. The majority of area within the Solar PV Sites is Subgrade 3b and Grade 4 which is not BMV land. A Soils and Agriculture assessment is contained within ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Measures are contained within the Outline Soil Resources Management Plan [EN010168/APP/7.15] to minimise the impacts of construction on soils.

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		to be inflicted on the area." "England is one of the most densely-populated countries in Europe with 426 people per sq km. By contrast, France has a population density of 120 per sq km, Germany 227 and even crowded Belgium has just 370. Again, this is a material consideration. Studies have proven the importance of the countryside to the mental wellbeing of the people. According to a study carried out in 2021 by Censuswide who spoke to more than 2,000 people outside rural areas across England and Wales, visiting the British countryside improved the physical and mental health of people living in towns and cities across Britain. 87% of respondents who visit the British countryside and farmland said visits to Britain's farmed landscape had improved their wellbeing and nearly half (47%) said they valued the British countryside and farmland more since the COVID pandemic began. Of those, 84% agreed that their visits had made them appreciate the role farmers play creating our iconic rural landscapes."		In terms of the concern regarding Chinese manufactured solar panels, the manufacturer has not yet been chosen. This approach is common for developments of this kind, as solar PV technology is constantly evolving and new efficiencies are developed regularly. Should the Applicant receive consent, it would carry out a comprehensive audit to identify the right solar PV panels for the Scheme. Currently over 95% of the world's panels are made in China, and therefore the carbon assessment in ES Volume 1 Chapter 6: Climate Change [EN010168/APP/6.1] has assumed they would be made in and transported from China (and using fossil fuels, despite China currently generating about a third of its electricity from renewables). In terms of noise, this has been assessed in ES Volume 1 Chapter 14: Noise and Vibration [EN010168/APP/6.1], which concludes no significant effects are expected with mitigation. In terms of fire risk including the risk to the railway, the Scheme includes embedded design mitigation and protection measures

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		"Studies have proven the importance of the countryside to the mental wellbeing of the people. According to a study carried out in 2021 by Censuwide who spoke to more than 2,000 people outside rural areas across England and Wales, visiting the British countryside improved the physical and mental health of people living in towns and cities across Britain. 87% of respondents who visit the British countryside and farmland said visits to Britain's farmed landscape had improved their wellbeing and nearly half (47%) said they valued the British countryside and farmland more since the COVID pandemic began. Of those, 84% agreed that their visits had made them appreciate the role farmers play creating our iconic rural landscapes." Completely insufficient there have been no bat surveys, Natural Power have considerable evidence That bats are completely disorientated by solar modules. No studies have been carried out on the BESS, caustic fumes in the event of a fire, water run off and contamination. Damage to		to reduce fire/explosion risk, which are detailed in the Framework Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. This is a key document relating to BESS safety. The BESS layout has been developed in consultation with the local fire and rescue service (FRS) and taken account of guidance from the National Fire Chiefs Council (NFCC). Communication with the local FRS will continue through the design and construction stages. In terms of water run-off from the BESS and the potential for contamination, this is assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. Provision of fire water containment (impermeable water capture to prevent used firewater reaching ground/the surrounding environment) is embedded in the design. As stated in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], where practicable, at detailed design stage it is recommended that runoff from the BESS Area will be contained by local bunding and attenuated within gravel subgrade of lined permeable SuDS features prior to being passed forward to the local land drainage network. This

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		the mainline rail railway artery connecting the West to London. Any fire could close the railway of weeks and is probably un insurable. The cable connection will cost circa £90 million alone and will make the project unviable and therefore not deliverable IGP and Macquarie have a track record of selling these projects once Loading them with debt or just making millions from a sale and so no warranties being offered have any value The UK Govt of offering £250.00 if you live near a pylon which shows how out of touch they are as it will reduce property prices by millions of pounds throughout the whole region and cable routes thereby opening up the project to numerous claims in the court It is the local impacted area, transport routes from port to site that should and will be devastated by this un required industrialisation of a rural area. There are knew technologies that make this old technology		would ensure that no impacts on water quality are had, particularly in the BESS Area, where runoff could otherwise reach sensitive watercourses. As per the recommendations set out in the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] in the event of a fire a system of automatically self-actuating valves at the outfalls from the battery storage areas will be closed, isolating the drainage from the wider environment. The water contained by the valves will be tested and either treated and released or tankered off-site as necessary and in consultation with the relevant consultees at the time. In terms of the comment that the panels are 13 foot high, this is incorrect. The height of the panels is 3.5m (11.5 foot) as stated in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]. In terms of the concern regarding house prices, in 2014, the Centre for Economics and Business Research and Renewable UK conducted a study of over one million homes in the UK to analyse the effect of wind farms on house prices. It found that onshore wind farms had no impact on the

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		Re think your site location you have done no alternative site location apart from finding fragmented greedy Landowners 20Km from the substation		value of residential properties within a 5km radius. Given solar panels are less obtrusive than wind turbines, we are confident that local property prices will not be affected by the Scheme. Effects on property value is not something taken into account by the Secretary of State when deciding the application, in accordance with s104 of the Planning Act 2008. In terms of the impact of the Scheme on mental and physical health, this has been assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] which concludes no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. In response to the comment that there have been no bat surveys and the claim that bats are disorientated by panels, bat surveys have been completed, see ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3]. The impact of the Scheme on bats has been assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], which concludes no significant effects in the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				construction phase, and a significant beneficial effect once the Scheme is operational. See the Outline EPMS [EN010168/APP/7.19] for further details. There is no evidence to suggest bats are disorientated by solar panels.
LD2_FFD_281	Project description and DCO process.	This is not one of the 200+ projects in the pipeline with NESO that should be progressed as there are many better alternatives given the massive over supply planned. Apart from not not progreesing it at all, t is way too big and the detrimental impact on farming,community,biodiversity far outweighs anything else. It would have a huge negative impact on the landscape. This is window dressing, ththere will be a huge negative impact on biodiversity both in construction and operation. The are many negative impacts on the environment,nothing positive. Smaller installations closer to grid substations are a better alternative, this project plans massive carving up of land for many miles. Huge disruption in construction and no plan to get rid of redundant panels in 30 years time other than landfill. There are no benefits to the community. This is green washing and	No	In terms of the concerns regarding the impact of the Scheme on the community and farming, this has been assessed in Environmental Statement (ES) Volume 1, Chapter 16: Socio-economic, Tourism and Recreation [EN010168/APP/6.1]. In terms of the concern regarding biodiversity, this has been assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. Measures are included in the Outline EPMS [EN010168/APP/7.19] to mitigate the impacts on biodiversity as far as practicable. The landscape and visual impact of the Scheme is fully assessed in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The Landscape and

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		wont happen. "There are over 200 projects in the queue for NESO approval which, if all approved would provide 4 times the 2035 govt target of 29GW. The 2050 govt target is only 36GW. This is from all renewables, not just solar. Your website statement that the govt 2030 target is 50GW is wrong so how can any of your claims be trusted? The country does not need the volume of power planned, only the 25% of projects that cause least damage and disruption to food security, farming, communities, landscape and biodiversity should be approved. This issue is not about profitability for any individual project so that should not be a criterion used. Compared to other projects yours fails to make the list on several points: 1) Damage and upheaval to communities including house prices and transport 2) Loss of prime agricultural land (Govt grades 1 to 3a) 3) Loss of landscape, any mitigations are window dressing 4) Negative impact on biodiversity, the destruction caused during construction and operation will displace vast numbers of wildlife, both small and large Further points in opposition to your project		Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and shown in Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18]. The Applicant is committed to working with local communities to keep disruption to a minimum. There are measures included within the Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] and Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] to limit impacts relating to the construction phase as far as possible. In terms of the comment that there is no plan to get rid of panels other than landfill. As stated within Section 20.3 of ES Volume 1 Chapter 20: Other Environmental Matters [EN010168/APP/6.1] it is assumed that the solar panels and batteries would be recycled. Recycling routes are generally available for component replacement waste at present, and it is likely that there

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		are: 1) Your project would be the biggest in Europe, so given we are massively oversubscribed with potential projects we do not need any to be this large 2) Both on and offshore wind are less damaging to our land environment overall 3) Wiltshire is already over impacted by solar farms compared to other areas In conclusion I state that I am completely opposed to this project for the reasons detailed above".		will be even greater opportunities for recycling in the future, not least because the recycling market will have expanded to meet demand as solar PV installations increase. The Outline Operational Environmental Management Plan (OEMP) [EN010168/APP/7.12], secured within the draft Development Consent Order (DCO) Application, sets out the commitment of the Applicant to maximise recycling and reuse of the Scheme components at the end of their life. In terms of the comment that there are no benefits to the local community, construction of the Scheme will create 771 jobs, 326 of which are expected to be sourced from the local area. During operation, 15 permanent jobs would be generated. Further jobs are anticipated to be created during replacement activities and in decommissioning, although these will not be at the levels anticipated for construction. Job creation provides employment and skills benefits and further enhancement measures are proposed and set out in the Outline SSCEP [EN010168/APP/7.20] to enhance local education through promoting apprenticeship and training schemes, to

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				promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. The Scheme will also enhance and improve connectivity in line with NPS EN-1 and the Scheme design principles through the creation of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. In terms of the claim that the Applicant can't be trusted, Section 161 of the Planning Act 2008 provides that it is an offence if without reasonable excuse a person carries out development in breach of the terms of a DCO or if a person does not comply with the terms of a DCO. If a person is found guilty of an offence in respect of the breach of a DCO, they may be subject to a fine or the local planning authority may apply for an injunction to prevent any further unauthorised works being carried out. The need for the scheme is set out in the Statement of Need [EN010168/APP/7.1] which provides an analysis of many

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				different low carbon generation technologies which are being developed as part of the UK's fight against climate change. The Statement of Need concludes, in Section 6.12, that a large capacity of many low carbon technologies is required to meet the Government's energy objectives. While the need for unprecedented capacity growth is urgent, some technologies (e.g. nuclear, SMRs, tidal) are either unproven at scale, unconsented, unfunded or have long development timescales (and therefore do not meet the urgent need identified in EN-1 Para 3.1.1 and following). These technologies and indeed other technologies may not be suitable to connect to Melksham substation, and therefore would not support the need to use existing and available infrastructure to minimise the cost and timescales associated with connecting to the grid, the large capacities of low carbon generation needed to meet net zero. Section 7.7 of the Statement of Need compares the annual energy generated per square kilometre from solar, from onshore wind and from crop-to-energy (biofuels) technology. The analysis shows that large-scale ground-mount solar schemes which maximise their annual output, are likely to

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				produce a greater quantity of low carbon electricity per acre than the output from a crop-to-biogas application; and that the energy production from land under solar is of a similar order of magnitude to the energy production from land under onshore wind, while the environmental effects of solar schemes may be significantly lower. The Applicant therefore agrees that other low carbon technologies are urgently needed in the UK to meet the UK's climate legal targets; however none of those technologies are more suitable at the proposed location than the Scheme, and none listed in this Representation are viable alternatives to the Scheme, because they will all be needed too. In terms of the concern regarding house prices, in 2014, the Centre for Economics and Business Research and Renewable UK conducted a study of over one million homes in the UK to analyse the effect of wind farms on house prices. It found that onshore wind farms had no impact on the value of residential properties within a 5km radius. Given solar panels are less obtrusive than wind turbines, we are confident that local property prices will not be affected by the Scheme. Effects on

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				property value is not something taken into account by the Secretary of State when deciding the application, in accordance with s104 of the Planning Act 2008. In terms of the concern regarding transport, this is assessed within ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. A CTMP [EN010168/APP/7.22] has been prepared which includes measures to manage construction traffic and staff vehicles within the vicinity of the Scheme along the local highway network, in order to limit potential disruptions and implications on the wider transport network. In terms of the concern regarding the loss of agricultural land, the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Soils and Agriculture. BMV land was a key consideration in the site selection process, with details set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The

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				ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. The majority of area within the Solar PV Sites is Subgrade 3b and Grade 4 which is not BMV land. A Soils and Agriculture assessment is contained within ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Measures are contained within the Outline Soil Resources Management Plan [EN010168/APP/7.15] to minimise the impacts of construction on soils. The cumulative impact of the Scheme and other nearby Schemes (including solar developments) has been assessed within ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].
LD2_FFD_037	Project description and DCO process.	This project is unwise, it is based on a false narrative, and benefits no one except the businesses associated with its construction. To take large amounts of agricultural land (whatever its grade - we have grade 3 land producing 4 tonnes/acre of wheat on a good year) out of production at a time when it is getting more and more difficult to maintain yields, when demand is increasing, and when the geopolitical situation is becoming increasingly unstable, is at best lacking	No	In terms of the comment that there are no benefits to the local community, construction of the Scheme will create 771 jobs, 326 of which are expected to be sourced from the local area. During operation, 15 permanent jobs would be generated. Further jobs are anticipated to be created during replacement activities and in decommissioning, although these will not be at the levels anticipated for construction. Job creation provides

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		foresight, but in reality completely foolish. This is not a NIMBY issue. The answer would be the same, wherever such ill-advised schemes such as these are planned. Showing pictures of sheep amongst the PV panels is a sales scam. None of the owners of solar panel farms in this area run sheep among their panels, and I suspect that this is probably the case for the majority nationwide. Why would you bother with the hassle of sheep if you're getting £1000/acre per annum." Unable to find detailed map of northern part of cable route. Flooding is likely to increase. We should be taking measures to reduce the effects of flooding - not adding to them. Cable corridor way too wide. The red line is very specific suggesting there is a pre - determined reason why it can't go the other side of the line. If this is the case, it must be possible to define a much tighter cable corridor. As far as possible, the cable route should go through participants land as a priority - not through 3rd parties land who have no interest. Unable to find any mention of		employment and skills benefits and further enhancement measures are proposed and set out in the Outline SSCEP [EN010168/APP/7.20] to enhance local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. The Scheme will also enhance and improve connectivity in line with NPS EN-1 and the Scheme design principles through the creation of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. In terms of the claim that showing sheep amongst the PV panels is a scam, the imagery used in consultation materials showing sheep grazing among solar panels was intended to illustrate one of the potential land use strategies that may be adopted during the operational phase of the solar farm. There are no known covenants that would prevent the land beneath the solar PV panels from being used for sheep grazing. As such, there is potential for agricultural use during operation, including collaboration with local

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		compensation. We had a sewer line installed by compulsory order more than 7 years ago. Some of the land still isn't producing a crop and this year there was flooding on this land where there has never been flooding before." "Cable corridor way too wide. The red line is very specific suggesting there is a pre - determined reason why it can't go the other side of the line. If this is the case, it must be possible to define a much tighter cable corridor. As far as possible, the cable route should go through participants land as a priority - not through 3rd parties land who have no interest. Unable to find any mention of compensation. We had a sewer line installed by compulsory order more than 7 years ago. Some of the land still isn't producing a crop and this year there was flooding on this land where there has never been flooding before." Proposed construction traffic will have significant negative effect on local infrastructure and communities. As stated above, no one except IPG and its associates will benefit from this extended and negative upheaval.		landowners and farmers to manage grassland through sheep grazing. The solar industry is committed to supporting sustainable rural development and is actively working with farming groups to develop best practice guidelines for dual land use approaches on solar farm sites, including grazing and biodiversity enhancements. In terms of the concern regarding flooding, this has been assessed in detail within Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the supporting Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. No significant effects are expected. In response to the concern regarding the width of the cable route corridor, the cable route corridor has been selected in consideration of various constraints and criteria in order to avoid and reduce effects on various environmental and other receptors as far as practicable. For further information on alternatives considered for the Cable Route Corridor, please see ES Volume 1, Chapter 4: Alternatives and

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		I cannot think of any benefits. Who wants to walk through an industrial zone? Most farmers are already planting wildflower mixes and nectar rich areas etc under SFI schemes. Suggesting this project will bring benefits to local communities is disingenuous. Subsidised electricity for all vulnerable and needy in the area. This project clearly has nothing to do with a concern for the environment. It is well attested by many environmental auditors, that such large scale projects deliver very little net positive benefit to the environment. The driving force is big business seeing financial opportunity. That being the case, I have no qualms about saying NIMBY.		Design Evolution [EN010168/APP/6.1]. Detailed maps covering the full length of the proposed cable route were made available as part of the consultation materials. These maps were accessible via the Scheme website, CAP sites, upon request and in-person at information events. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Scheme team. It is not true that the Scheme has nothing to do with a concern for the environment. The Scheme has been designed to limit the impact on the environment. A full environmental impact assessment has been carried out in the ES [EN010168/APP/6.1]. Mitigation measures are secured within the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], Outline

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				Operational Environmental Management Plan (OEMP) [EN010168/APP/7.13], and Outline Decommissioning Strategy (DS) [EN010168/APP/7.9]. In terms of the benefits for the environment, the Applicant is committed to delivering ecological enhancements and biodiversity net gain. ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] provides a detailed assessment of the likely visual effects of the Scheme.
LD2_FFD_484	Project description and DCO process.	Proposal will permanently negatively impact a huge area, removing valuable land from the food chain, to utilise technology that is solar dependant in a country that has limited sunshine, and will inevitably be proven ineffective. Impact will also be huge on residents, local business, and most importantly the ecology across a huge area. Impact during development will wreck the lives of local communities and destroy habitats of wildlife. The area is also prone to flooding and the development will have a huge negative impact on water run off and increase flood risk. The proposal is too big, in the wrong location, too close to communities and historic trails, it fails to genuinely consider the impact it will have on biodiversity and presents a physical and mental health risk	No	Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK</i>

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		for thousands of local people who do not want this to happen. The siting of battery parks next to a railway line, and 20 miles away from the grid connection is ridiculous presenting a health and safety risk from fire and chemicals to local villages. There is no support or evidence of a bio-diversity net gain of 10% and even if there was the outcome should be a 20% as per the revised local plan. It is impossible for your design principles to even mitigate let alone improve anything that the area already has, at all in your proposal. It is frankly insulting to suggest that a development of this scale can do anything but wreck the landscape and views. You know this and have no intention to do anything more than pay lip service through your measures Nothing you are suggesting will get remotely close to mitigating the long term destruction of ecology and biodiversity. You have not made any persuasive arguments about the protection of for example bats, ground nesting birds, brown hares, great crested newts and white clawed crayfish. Beyond the above, your intended industrialisation of the countryside will seriously impact residents amenity and will bring unwelcome stress to local communities resulting in both physical and mental health.		<i>Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. In reference to flood risk and drainage, the Solar PV Sites are mostly located in Flood Zone 1, and the previous Environment Agency RoFSW Map indicates that the majority of Lime Down Solar PV Sites are at Very Low risk of surface water flooding, meaning it has a <0.1% annual probability of flooding. Therefore, the Solar PV Sites are considered to be at Low Risk of fluvial or surface water flooding. Embedded mitigation measures have also been

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		It is simply nonsensical to position a solar site 13miles from the grid connection. The lack of proximity just multiplies the hugely negative impacts on environment on ecology. It consolidates the obvious, that the proposed solar site location is unsustainable, and purely speculation for financial gain and greed of people who will not be impacted at all. There are also major contradictions with the Governments drive to build more homes and grid capacity. Site is so huge and distance from grid so far that it is impossible to see how the severe impacts of construction, operation and decommissioning can be mitigated. you are short on detail of mitigations because you know this to be true and do not have answers. There are simply no benefits to the local environment and community of this scheme. If you really care about any of this you should not proceed with the scheme. There are no benefits for the local environment and our communities. The Lime Down proposal will bring no proven benefits to local or general population, or the environment. You are guilty of pure financial speculation and will-full destruction as are the local landlords who have taken the money irrespective of the wishes of the communities they live in.		implemented to further reduce the risk, including the associated electrical infrastructure being located to areas with a 'low probability of flooding', where practicable, run-off from equipment and access tracks will be directed to permeable SuDS features such as gravel-filled trenches or French drains, and 8 m buffers from infrastructure will be established around watercourses, including Main Rivers and Ordinary Watercourses. Flood risk has been assessed in further detail within Environmental Statement (ES) Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the supporting Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. The Scheme is designed to ensure runoff rates and volumes remain consistent with greenfield conditions. Measures such as permeable surfacing, infiltration features, swales and attenuation storage will manage surface water. Embedded mitigation and design measures will be secured through the Outline Construction Environmental Management Plan [EN010168/APP/7.12] and finalised at detailed design. In terms of fire risk, the Scheme includes

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		The IGP people we have spoken to at the consultation meetings are smug, bereft of detail or local knowledge and have no compassion which is dissapointing but not a surprise.		embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. This is a key document relating to BESS safety. The BESS layout has been developed in consultation with the local fire and rescue service (FRS) and taken account of guidance from the National Fire Chiefs Council (NFCC). Communication with the local FRS will continue through the design and construction stages. ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], supported by appendices in Volume 3 (12.2 to 12.5 [EN010168/APP/6.3]) has assessed the potential impact of the scheme on identified archaeological assets, where required appropriate mitigation is proposed (see ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (EN010168/APP/6.3.12.6)). Details on site selection and alternatives are detailed including the suitability of the location for BESS in Lime Down D. The Applicant confirms that engagement with Network Rail confirms that they do not oppose the scheme provided the scheme

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				meets requirements which the applicant is working to meet. Fire safety is confirmed in the OLEMP. Solar energy is at the heart of the Clean Power 2030 Mission (April 2025 revised draft NPS EN-3, Para 2.10.2) and it is Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the Statement of Need [EN010168/APP/7.1] and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 9.5) demonstrate that a multi-technology approach to electricity supply can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of energy storage as associated development to the main solar scheme will support the operation of the main solar scheme and will be able to store energy generated by

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				the main solar scheme and export it to the grid when it is needed, for example overnight. Finally, that other countries may experience higher solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work, or should not be pursued; and it is Government's view that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system and consumers." A BNG Assessment and completed DEFRA Metric has been submitted with the DCO application in Development Consent Order (DCO) Volume 7 Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [EN010168/APP/7.9]. This is a standardised and quantitative method of demonstrating the scheme will deliver net gain for biodiversity. As the Scheme is a National Significant Infrastructure Projects (NSIP), it is not yet mandatory to achieve

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				10% measurable Biodiversity Net Gain, with this requirement for NSIPs expected to be made mandatory for applications made from May 2026. Nevertheless, a BNG Assessment for the Scheme is provided in Biodiversity Net Gain Assessment Report [EN010168/APP/7.8] and a completed version of the Statutory Biodiversity Metric [EN010168/APP/7.9] provided, both of which demonstrate the Scheme will achieve BNG of at least 10% in Habitat Unit, Hedgerow Units and Watercourse Units. Ecological mitigation and enhancement proposals are described in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. It is acknowledged that not all information on ecology was presented at PEIR stage. The purpose of PEIR is to provide a preliminary assessment of the ecological effects of the proposed scheme. As such finalised assessments are not provided at PEIR to allow the Applicant time to take on the feedback received at Statutory Consultation and work this into the design envelope to be submitted in the DCO application.

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				The ecological mitigation and enhancement proposals are also shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]. Management of retained and newly created habitats are prescribed within the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]. This includes a comprehensive ecological monitoring programme designed to ensure habitats are establishing as expected, and determine remedial action in any instance where they are not. Potential impacts of the Scheme on the local ecology are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The assessment concludes that with the adoption of additional mitigation measures described in the above section it is considered that the majority of significant adverse effects can be reduced to neutral, non-significant levels. An Outline Ecological Protection and Mitigation Strategy (EPMS) [En010168/APP/7.19] has been produced to support the ES [EN010168/APP/6.1]

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				and Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] by providing more detailed ecology-focused protection and mitigation prescriptions for the construction phase. The Outline EPMS summarises the measures and approaches to be adopted which will limit the likelihood of impacts occurring upon retained habitats through damage, pollution and disturbance during the construction phase. An EcoCoW will be designated at the onset of the construction phase, which will provide ecological supervision during the completion of any works which will have the potential to impact protected and notable species, as appropriate. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, provide employment and income especially during construction and peak replacement activities, provide skills and training opportunities, provide onsite permissive paths to increase access to the

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				countryside, provide improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. This is meant as a means to recognise local community needs that the Scheme cannot meet but that the Applicant wants to be able to contribute towards. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Information on the Community Benefits Fund and what this can contribute towards will be consulted upon with Wiltshire Council, local parish councils, and any community groups which would like to be involved and have needs or services that they would like to see benefitting from the available funds. Decisions on funding will take place following DCO consent being granted." A detailed assessment of the likely significance of effects from the Scheme on employment and the economy has been included in ES Volume 1, Chapter 16:

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				Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]. This assessment considers the impact on construction and engineering, agriculture, and potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. In terms of the impact of the Scheme on mental and physical health, this has been assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] which concludes no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. In response to the comment that the Scheme is in the wrong location, as set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and the Site Selection Assessment Report at ES Volume 3, Appendix 4-1 [EN010168/APP/6.3] an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no obviously more suitable locations within the 20km

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				search area than the proposed location for the Scheme. In terms of the impact on landscape and views, this has been assessed in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].
LD2_FFD_532	Project description and DCO process.	It's too big, with accumulative impacts from other solar developments across the county. "The current IGP plans show panels in Area A4 coming right to our boundary of our garden. We have spoken with Will Threlfall at our home this week and he has agreed to the security fence and area of panelling to be pulled back circa 100m. Whilst this is a move in the right direction, we strongly consider there has been little consideration on the impact of Limedown on us as immediate residents, given we were assured of this 100m buffer as a minimum requirement at the onset of the project. The consultation period has provided no answers or confidence on noise pollution (panel motors, transformers, the near proximity of 132 KW substation A), visual impact (tall panels), possible light pollution from security lights and risks to privacy (cameras, construction workers). My stress	No	Food security will not be compromised by the Scheme (or solar energy more widely). In 2024, solar occupied around 7,300 ha of agricultural land in England, approximately half of which was in dual use for agricultural production. In the same year, 581,000 ha of arable land in England were left uncropped (source: <i>Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2024</i>). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's <i>UK Solar Roadmap</i> (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		and anxiety and overall mental health have been affected accordingly. This is our lifetime home having worked hard to achieve it in its rural setting. Field A4 in its entirety should be free from solar park infrastructure and be a dedicated nature buffer zone for the following reasons: • Visually it is the road approach to the ANOB and Sherston and should be protected from visual impacts of solar park industrialisation • It would allow screening and mitigation of visual intrusion and noise pollution to Southfield residence and accordingly mitigate against loss of property value • It would allow east-west migration of wildlife between fields that are not in the solar park plan, so deer e.t.c. are not forced to travel through our garden or a narrow buffer which is against their instinct, or worse still, along the road which has two blind corners so causing a hazard to motorists • The A4 field is currently habitat to protected species such as resident Barn Owl and Red Kite. No buffer zone has been considered for the two fields next to the ANOB."		Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. The cumulative impact of the Scheme along with other Schemes (including solar projects) in the local area are considered within Environmental Statement (ES) Volume 1, Chapter 21: Cumulative and In-Cumulative Effects [EN010168/APP/6.1]. The shortlist has been considered by every technical chapter and the conclusions provided in Chapter 21. Although the Applicant appreciates Wiltshire hosts a large number of solar developments, it is not the area with the highest concentration in the UK. The statutory consultation included a preliminary design and assessment. The

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		There is no indication in the plans on what these could actually be, nor e.g. the level of maturity of trees or species, that would attempt to mitigate the loss of habitats. The scale of the park would cause undue pressure on some wildlife species. "No hedgerow planting will mitigate against the impact on landscape and views. The panels proposed are too big. Limedown as planned would be visible from all elevated areas across Wiltshire. It would also be seen from aeroplanes which would be a national embarrassment on how we've allowed vandalism of our countryside and destruction of a rural region." I am concerned about the impact on wildlife species particularly birds. [REDACTED] [REDACTED] [REDACTED] [REDACTED] "I am shocked that IGP are even considering Limedown on top of an aquifer that supplies drinking water to thousands. The risk of contamination from pollutants e.g. from		Development Consent Order (DCO) application includes the updated design and a thorough assessment of the impacts in the Environmental Statement (ES) [EN010168/APP/6.1]. The Applicant is comfortable that the mitigation is adequate and that the Scheme aligns with national and local planning policy; this is outlined in the Planning Statement [EN010168/APP/7.2]. In terms of noise pollution, the impacts of the Scheme have been assessed in ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]. During the construction phase of the Scheme, noise levels are anticipated to be below the daytime SOAEL and therefore not significant, at all receptors. Due to the nature of the operational and maintenance activities of the Scheme, vibration is considered to be negligible and unlikely to be perceptible. This assumption was validated within the Planning Inspectorate Scoping Opinion Responses. Expected traffic volumes during the operation and maintenance, replacement periods are presented in Section 13.10 of ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. Embedded

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		BESS fires, panel cleaning biocides, lead from broken panels etc is to too great to consider as acceptable. This area is already susceptible to flooding. Rapid runoff from panels will exacerbate leaching from soil, flooding of roads and especially affect areas downstream on the Avon." "There must be an escrow account for decommission costs, that can be accessed to immediately decommission and restore to an unsullied state. Legal obligation with stiff time penalties for non-compliance must be carried forward to whoever is managing LimeDown. Public sentiment is already strongly in favour of protecting food security over ground mounted solar. Ground mounted solar is already illegal in some countries. Emerging technologies will soon demonstrate that ground solar on such huge land scale, taking up good, productive farmland is unnecessary. That there is no need to destroy rural economies, denying agricultural skill transfer to the next generation of farmers, damaging the wellbeing and recreation opportunities for those who value the British countryside and		mitigation measures will be employed such as the screening of noise sources via the erection of temporary screens would be employed where practicable when works are taking place within close proximity to sensitive receptors. Where practicable, the Scheme layout has been developed to minimise noise and vibration effects at sensitive receptor locations. The BESS Area and 132kV and 400kV Substations have been located a minimum of 450m and 400m from receptor locations respectively. In reference to visual impacts, the Scheme has been assessed within ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The summary of the effects upon the Special Qualities of the Cotswold National Landscape is identified within Section 8.11 of ES Volume 1 Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The full assessment is contained within Appendix 8.6 [EN010168/APP/6.3]. This includes an assessment of the impacts of the proposal upon landscape character, visual and the special qualities of the Cotswold National Landscape. This section also considers the positive enhancement measures

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		its heritage, for now and future generations." LimeDown is an horrendous scheme where the few are exploiting the many. It is wrong all levels of consideration and I am deeply opposed to it.		incorporated into the scheme to further the purposes of the Cotswold National Landscape. A series of photomontages have been produced to show the effects of the Scheme at locations where significant effects were considered likely to occur. Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives for WCC and CNLB. For viewpoints from where Photomontages have been produced, visualisations have been produced at Year 1 Winter (to demonstrate worst case) and at Year 15 Summer (to demonstrate the screening effects of the Embedded Mitigation). The potential ecology impacts (including the impact on birds) have been assessed within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The ecological mitigation and enhancement proposals are also shown in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]. Management of retained and newly created habitats are prescribed within the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]. This includes a

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				comprehensive ecological monitoring programme designed to ensure habitats are establishing as expected, and determine remedial action in any instance where they are not. Potential impacts of the Scheme on the local ecology are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The assessment concludes that with the adoption of additional mitigation measures described in the above section it is considered that the majority of significant adverse effects can be reduced to neutral, non-significant levels. An Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] will be produced to support the ES [EN010168/APP/6.1] and Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] by providing more detailed ecology-focused protection and mitigation prescriptions for the construction phase. The Outline EPMS [EN010168/APP/7.19] summarises the measures and approaches to be adopted which will limit the likelihood of impacts occurring upon retained habitats through damage, pollution and disturbance during the construction phase.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				An EcoCoW will be designated at the onset of the construction phase, which will provide ecological supervision during the completion of any works which will have the potential to impact protected and notable species, as appropriate. Buffers have been integrated into the Scheme to avoid impacts to ditches, watercourses, ponds, woodland, hedgerows, trees, designated sites, and other ecological features identified, such as badger setts, bat roosts, and nesting sites. These buffer distances are detailed in ES Volume 1, Chapter 9: Ecology and Biodiversity and will not contain Solar PV Mounting Structures, hard standing or electrical hardware, with the exception of new accesses and cables which need to cross existing habitats. Protective fencing will observe these buffer distances during the construction phase. In terms of fire risk, the Scheme includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. This is a key document relating to BESS safety.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				The BESS layout has been developed in consultation with the local fire and rescue service (FRS) and taken account of guidance from the National Fire Chiefs Council (NFCC). Communication with the local FRS will continue through the design and construction stages. In terms of water run off from the BESS and the potential for contamination, this is assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. Provision of fire water containment (impermeable water capture to prevent used firewater reaching ground/the surrounding environment) is embedded in the design. As stated in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], where practicable, at detailed design stage it is recommended that runoff from the BESS Area will be contained by local bunding and attenuated within gravel subgrade of lined permeable SuDS features prior to being passed forward to the local land drainage network. This would ensure that no impacts on water quality are had, particularly in the BESS Area, where runoff could otherwise reach sensitive watercourses. As per the

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				recommendations set out in the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] in the event of a fire a system of automatically self-actuating valves at the outfalls from the battery storage areas will be closed, isolating the drainage from the wider environment. The water contained by the valves will be tested and either treated and released or tankered off-site as necessary and in consultation with the relevant consultees at the time. The decommissioning phase of the Scheme is included within the Development Consent Order (DCO) application, and is anticipated to take place after 60 years of operation. Section 161 of the Planning Act 2008 provides that it is an offence if without reasonable excuse a person carries out development in breach of the terms of a DCO or if a person does not comply with the terms of a DCO. If a person is found guilty of an offence in respect of the breach of a DCO, they may be subject to a fine or the local planning authority may apply for an injunction to prevent any further unauthorised works being carried out. It is not in the Applicant's interest to fail to comply with the terms of a

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				DCO or carry out works in breach of a DCO. In terms of the concern regarding light pollution, as stated in ES Volume 1, Chapter 2: The Scheme [EN010168/APP/6.1], temporary site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds while construction is underway. All construction lighting will be deployed in accordance with the following recommendations to prevent or reduce the impact on human and ecological receptors: • The use of lighting will be minimised to that required for safe site operations; • Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and • Lighting will be directed towards the

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				middle of the Order limits rather than towards the boundaries. Measures to control lighting are set out in the Outline CEMP [EN010168/APP/7.12]. Lighting is not required within the Solar PV Sites during the operation phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable, and therefore it is anticipated that focussed task specific lighting should only be required in the event of emergency works/equipment failure requiring night-time working. Motion sensing security lighting would be provided within substations and within the BESS Area to be used to maintain safe working conditions in winter months, security purposes, and maintenance activities. The lighting commitments for the operation phase are set out in the Outline OEMP [EN010168/APP/7.13], including details on lighting design, such that light spill is anticipated to be minimal. In terms of the concern regarding privacy, CCTV would be internally facing as stated in ES Volume 1, Chapter 2: The Scheme [EN010168/APP/6.1].

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				In terms of the impact of the Scheme on wellbeing, this has been assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. The assessment concludes no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. In terms of details regarding planting (including maturity and species), this is contained within the Outline Landscape and Ecological Mitigation Plan [EN010168/APP/7.18]. In reference to flood risk and drainage, the Solar PV Sites are mostly located in Flood Zone 1, and the previous Environment Agency RoFSW Map indicates that the majority of Lime Down Solar PV Sites are at Very Low risk of surface water flooding, meaning it has a <0.1% annual probability of flooding. Therefore, the Solar PV Sites are considered to be at Low Risk of fluvial or surface water flooding. Embedded mitigation measures have also been implemented to further reduce the risk, including the associated electrical infrastructure being located to areas with a

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
				'low probability of flooding', where practicable, run-off from equipment and access tracks will be directed to permeable SuDS features such as gravel-filled trenches or French drains, and 8 m buffers from infrastructure will be established around watercourses, including Main Rivers and Ordinary Watercourses. Flood risk has been assessed in further detail within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and the supporting Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. The Scheme is designed to ensure runoff rates and volumes remain consistent with greenfield conditions. Measures such as permeable surfacing, infiltration features, swales and attenuation storage will manage surface water. Embedded mitigation and design measures will be secured through the Outline Construction Environmental Management Plan [EN010168/APP/7.12] and finalised at detailed design.
LD2_FFD_642	Project description and DCO process.	This is the wrong place for solar, across productive farmland (30% BMV), overlooked from an AONB and a treasured historic landscape along the Fosse Way. Your proposal will forever destroy this special part of England, its farming, communities, nature,	No	The UK's transition to a low-carbon energy system is necessary to avoid the effects of climate change. The Government expects that a low-cost, net zero and consistent electricity system is likely to be composed predominantly of wind, solar and nuclear.

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		wildlife and landscape. It is a source of wellbeing for so many locals and visitors alike. Many people in cars, cycling, walking and horse riders benefit from this landscape today, supporting a local hospitality and tourist industry, all of which will be destroyed under your proposals. All this to feed the corporate greed of an off-shore asset management company, with highly questionable track record. Solar is an inappropriate technology to use in the UK, being one of the least suitable countries to exploit solar, an approach that by it's nature produces power when least needed in the UK, less in winter when power demand rises and generates nothing at night. Net Zero (NZ) for the UK is a totally futile gesture. If the UK went net zero CO2 emissions tomorrow, it would have no material effect on global levels of pollution. The electorate have yet to be asked if they support NZ. Whilst we already see some rolling back of political intent here, there is surely more to come. Given this, we should not be approving industrial scale developments that forever destroy our environment ahead of electoral support for this strategy being clear, such as in a referendum. Macquarie Group as a major stakeholder in		The Applicant acknowledges that the energy generated by solar PV panels is intermittent in nature with regards to factors associated with the UK climate and seasonal variations. Solar technology has made significant advancements, with modern panels achieving high efficiency rates and continual improvements in performance. While efficiency varies by technology and conditions, solar panels are designed to maximise energy production even in less-than-ideal conditions, such as local weather conditions. Innovations in panel design and materials continue to enhance efficiency, making solar power a viable and effective renewable energy source. Modern solar panels can generate power when levels of irradiation are lower, and technology continues to improve, making solar energy a reliable and valuable energy source in the region. Long-term energy storage solutions and grid integration ensure that energy is available throughout winter. The need for the Scheme is set out fully in the Statement of Need [EN010168/APP/7.1]. In terms of the concern regarding the loss of agricultural land, the Scheme has been

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		IGP is a clear red flag. Having saddled Thames Water with massive debts, they then sold up and walked away when required to provide separate accountability to retail customers. They are the source of much of the trouble that has led to the potential bankruptcy at Thames Water. As owners of Thames Water they also received record fines. This should be sufficient to declare them as an unsuitable company to hold a significant share in any UK infrastructure project going forwards. I put in my comments to the first consultation that when more details become available I expected to be able to comment further. Unfortunately significant details of the project remain unknown, from what type of panels are used where, location of security fencing, lighting and CCTV, through where the cables would go. As such, this second consultation is a farce and should be performed afresh when the relevant details are available. We were devastated to see that your Stage 2 proposals show up to 4.5m panels coming right up to the boundary of our residential property in Area A. It appears no consideration has been taken to reduce impact to us as residents, something that		designed, as far as practicable, to avoid and reduce impacts and effects on Soils and Agriculture. BMV land was a key consideration in the site selection process, with details set out in Environmental Statement (ES) Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. The majority of area within the Solar PV Sites is Subgrade 3b and Grade 4 which is not BMV land. A Soils and Agriculture assessment is contained within ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Measures are contained within the Outline Soil Resources Management Plan [EN010168/APP/7.15] to minimise the impacts of construction on soils. The Applicant is committed to working with local communities to keep disruption to a minimum. There are measures included within the Construction Environmental Management Plan (CEMP)

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		has been done elsewhere in the scheme. We were previously told by an IGP representative that they would never come within 100m of our property and yet we see exactly this in the latest plans. Whilst we have since been informed that IGP will look again at your plans boarding our property, that it was 'missed' previously gives us no confidence that this will be suitably addressed. I do not want to look out from the end of my garden at a sea of 4.5m panels, listening to motors constantly whirring, waiting decades for saplings to grow until they hide this appalling destruction of the environment from my family. "Your propped monstrous industrial scale power plant will clearly utterly destroy miles and miles of greenfield countryside, habitat and historical settings, that have existed unchanged for many centuries. This will have a profound knock-on effects to people's mental health and well-being and destroy the local tourist economy. You have not provided details about the landscaping you intend to use to mitigate this devastation, but whatever you do will make only a token gesture towards addressing the mass destruction of environment, views and existing ecology this		[EN010168/APP/7.12] and Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] to limit impacts relating to the construction phase as far as possible. In terms of the impact of the Scheme on mental and physical health, this has been assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] which concludes no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. The impact of the Scheme on tourism has been assessed in ES Volume 1, Chapter 16: Socio-economics, tourism and recreation. In terms of tourism, the assessment concludes temporary significant effects on national and regional attractions. Mitigation measures have been included to remove array areas and offset from highways. Construction traffic management will also be used to control HGV routing and numbers, see the Outline CTMP for further details. In response to the comment regarding the type of panel to be used, as stated within

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		project will bring. Miles of small country lanes need to be widened for construction traffic, miles of hedge rows will be destroyed and travel in the area will become a nightmares for years during construction. Proposing a BESS on a drinking water aquafer seems utter madness. Whilst battery fires are rare, they do happen and generate a lot of toxic pollution when they do. There is little practical experience with dealing with such fires, so whilst you may claim to design in protection for the environment and our water in particular, much of that is based on wishful thinking rather than real world experience. Where are the impact analysis of a BESS fire in your proposals, the fallout over surrounding towns and villages, and poisoning of our water supply? Any BESS should be located away from important water courses and next to the Grid connection, to minimise transmission losses." "The proposed massive 4.5m panels will be visible from many miles around in all directions. The idea that planting saplings around the edge of the panelled areas will provide screening to protect the environment is fanciful. At best the site will be an industrial eye sore for a decade or more		ES Volume 1, Chapter 2: The Scheme [EN010168/APP/6.1] the type/specification of Solar PV Panel will be confirmed at detailed design. Flexibility has been built into the design of the Scheme when submitting the Development Consent Order (DCO) Application so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of potential effects. The impact of the Scheme on ecology is assessed within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The assessment concludes that with the adoption of additional mitigation measures described in the above section it is considered that the majority of significant adverse effects can be reduced to neutral, non-significant levels. An Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] has been produced

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		before any screening is remotely effective. How mature will the newly planted hedges be? There are no details about how screening will be approached, so again how can we meaningfully consult in an information vacuum? Whilst it was encouraging to see some fields removed from those to be panelled, most of the remaining panelled fields will be visible from roads and paths. To repeat, if allowed to go ahead, this project will utterly destroy the landscape, environment and existing wildlife across a vast tract of countryside." This land is home to a wide array of wildlife, such a barn owls, kites, buzzards hares, frogs & toads, deer, kingfishers and may flies to name a few. Whilst you might sprinkle a few wild meadow seeds around your panels to claim supporting bio-diversity, how are these raptors going to feed when you cover thousands of acres of their habitat with panels? I care less about what new species you might encourage and much more about you forever destroying the habitat for those already here. What specifically are you doing to mitigate the damage done to the local barn owl and skylark populations?		which provides more detailed ecology-focused protection and mitigation prescriptions for the construction phase. The Outline EPMS [EN010168/APP/7.19] summarises the measures and approaches to be adopted which will limit the likelihood of impacts occurring upon retained habitats through damage, pollution and disturbance during the construction phase. An EcoCoW will be designated at the onset of the construction phase, which will provide ecological supervision during the completion of any works which will have the potential to impact protected and notable species, as appropriate. The ecological mitigation and enhancement proposals are also shown in in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.1]. Management of retained and newly created habitats are prescribed within the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]. This includes a comprehensive ecological monitoring programme designed to ensure habitats are establishing as expected, and

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		"Please see earlier comments about locating a BESS on an aquifer, and the potential danger to the environment from battery fires. I see no analysis of the impact of a fire on the environment in the assessment and no illustrative examples of the scale of evacuations that would be required in the surrounding areas should a fire break out. I would add that any mitigation to protect against contaminated water leakage into the local environment is based only upon guess work rather than direct experience. History is littered with examples where safety features have ultimately proved ineffective. We should not put our local water courses at risk to this new and not well understood risk." The cable route search area is so vast, it's impossible to comment meaningfully about the proposal. This should be bought back for consultation as and when the proposed cable routes are known. "You make much of the land returning to its original state when the solar plant is no longer needed. I believe this to be a fundamentally misleading assertion. There is no precedent in the UK for any large scale solar facility ever being returned to farming		determine remedial action in any instance where they are not. Potential impacts of the Scheme on the local ecology are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. The assessment concludes that with the adoption of additional mitigation measures described in the above section it is considered that the majority of significant adverse effects can be reduced to neutral, non-significant levels. An Outline Ecological Protection and Mitigation Strategy (EPMS) [EN010168/APP/7.19] has been produced to support the ES [EN010168/APP/6.1] and Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] by providing more detailed ecology-focused protection and mitigation prescriptions for the construction phase. The Outline EPMS summarises the measures and approaches to be adopted which will limit the likelihood of impacts occurring upon retained habitats through damage, pollution and disturbance during the construction phase. An EcoCoW will be designated at the onset of the construction phase, which will provide ecological supervision during the

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		use. There is however plenty of precedent for green field land once built on in some way sliding into the classification of brownfield, and then being used for housing or industrial development. If this proposal is given the go ahead, one of the most precious parts of the country will be forever destroyed. One thing is for sure, IGP and Macquarie Group are almost guaranteed to have 'disappeared' from any responsibilities here before this comes home to roost. Any owners should be required to maintain an escrow account to the value of what is required to return the land back to how it is now. I have no confidence the land will ever be returned to farming, more likely cheap housing to support mass immigration into the UK. IGP aren't even interested in building and running the site, let alone clearing up. Nothing like sufficient safeguards are in place to ensure any new owners have full responsibility for clearing up this corporate vandalism." The community are quite happy with the existing environment. No amount of "information boards" is going to make up for the monumental destruction of our environment this proposal would deliver.		completion of any works which will have the potential to impact protected and notable species, as appropriate. In terms of fire risk, the Scheme includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework Battery Safety Management Plan (BSMP) [EN010168/APP/7.21]. This is a key document relating to BESS safety. The BESS layout has been developed in consultation with the local fire and rescue service (FRS) and taken account of guidance from the National Fire Chiefs Council (NFCC). Communication with the local FRS will continue through the design and construction stages. In terms of water run off from the BESS and the potential for contamination, this is assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. Provision of fire water containment (impermeable water capture to prevent used firewater reaching ground/the surrounding environment) is embedded in the design. As stated in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1],

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Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicants evidence?	Applicant response
		This project is so utterly despised in the local community that I would not expect any group, club or institution to want to be associated with it in any way whatsoever. I understand one local club has already turned down an offer of sponsorship. I also understand one of the land owners is looking to sell up their home and move out of the area. I'm not surprised. Perhaps as they struggle to find a buyer for their own home given the Lime Down proposals, they will start to understand just how badly they have betrayed the local community by engaging with this scheme. "For those of us that live near or within sight of the proposed panelled fields or batteries, what compensation is offered to us for the construction disruption, our loss of environment, loss of value to our homes? Those of us that do not want to live next to an industrial scale power plant are now locked into a zombie state where we can not even sell and move if we wish. You have already visited a nightmare upon our community. Independent assessments suggest a drop of 5-10% in property values. Whilst the land owners and the off shore investors get rich from this scheme, what is		where practicable, at detailed design stage it is recommended that runoff from the BESS Area will be contained by local bunding and attenuated within gravel subgrade of lined permeable SuDS features prior to being passed forward to the local land drainage network. This would ensure that no impacts on water quality are had, particularly in the BESS Area, where runoff could otherwise reach sensitive watercourses. As per the recommendations set out in the Outline Battery Safety Management Plan (BSMP) [EN010168/APP/7.21] in the event of a fire a system of automatically self-actuating valves at the outfalls from the battery storage areas will be closed, isolating the drainage from the wider environment. The water contained by the valves will be tested and either treated and released or tankered off-site as necessary and in consultation with the relevant consultees at the time. The risk to drinking water resources has been considered in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1], and associated appendices in Volume 3, 19-1 to 19-8 [EN010168/APP/6.3]. Any risks posed by

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		the proposal to compensate all those of us that are losing out materially from this development? You say you don't use subsidies, but there is no mention of the governments 'Contracts for Change' scheme in your material. I expect the operators will be using this scheme to guarantee high prices for any electricity produced, even if it is of no benefit to the National Grid at the time. This is a subsidy in all but name and removes much of the commercial risk to the investors, who are then able to lock in a tax-payer backed gravy train of profit, whilst the locals suffer material reduction in the value of their homes."		this can be successfully mitigated through embedded mitigation proposed in the scheme. Further measures to protect drinking water resources and other controlled waters receptors are secured in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] and Outline Operational Environmental Management Plan [EN010168/APP/7.12]. In response to the concerns regarding decommissioning impacts, none of the land will be considered as brownfield after decommissioning. Mitigation measures to avoid and reduce impacts during decommissioning are included in the Outline Decommissioning Strategy [EN010168/APP/7.14]. A draft DCO [EN010168/APP/3.1] has been submitted as part of the Application. Section 161 of the Planning Act 2008 provides that it is an offence if without reasonable excuse a person carries out development in breach of the terms of a DCO or if a person does not comply with the terms of a DCO. If a person is found guilty of an offence in respect of the breach of a DCO, they may be subject to a fine or the local planning authority may apply for an injunction to prevent any further unauthorised works

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				being carried out. It is not in the Applicant's interest to fail to comply with the terms of a DCO, or carry out works in breach of a DCO. In terms of the concern regarding house prices, in 2014, the Centre for Economics and Business Research and Renewable UK conducted a study of over one million homes in the UK to analyse the effect of wind farms on house prices. It found that onshore wind farms had no impact on the value of residential properties within a 5km radius. Given solar panels are less obtrusive than wind turbines, we are confident that local property prices will not be affected by the Scheme. Effects on property value is not something taken into account by the Secretary of State when deciding the application, in accordance with s104 of the Planning Act 2008.
LD2_FFD_842	Project description and DCO process.	If successful this project will have a devastating effect on my equine businesses that are next to the proposed solar park. The level of construction especially noise during the building of the solar park will not allow me to use my Stud farm. As horses are animals of "flight not fight" noise levels and the constant use of heavy machinery will lead to a serious risk for the horses and the	No	Environmental Statement (ES) Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] identifies and proposes measures to address potential impacts and likely significant effects noise as a result of the Scheme. It concludes that, with embedded mitigation, there are no significant effects anticipated in relation to noise during the construction, operation

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		staff that look after them. My horses are generally of a young age and it's these horses that are most vulnerable to sudden changes in noise levels or abnormal activity from beyond their own domain. I simply will no longer be able to guarantee a safe farm for my staff or horses." "The buffers zones are unclear and during your consultations Lime Down claim biodiversity gains by not touching areas that haven't been touched in years where nature is already doing a fine job ! When I looked at other lime down projects your screening looked very minimal . I also noted that you promote grazing sheep between panels however this is obviously spin and totally unrealistic farming ." Again no real substance on what you're going to do about my farm and the effect you will have on my horse business . You have not carried out the correct research to understand the effect on the local equine industry or indeed any other local businesses never mind the effect on local property prices.		and maintenance, or decommissioning phases of the Scheme. For construction noise created by the main activities of construction, receptors around the Solar PV Sites and Cable Route Corridor remain below the daytime SOAEL except for one receptor relating to the Cable Route Corridor (R58: Silver Street), where the calculated construction noise levels are equal to the SOAEL and therefore represent a significant moderate adverse effect without mitigation. However, this is based on the worst-case scenario (without mitigation and not taking account of the sequential nature of works), and it is expected that, with the inclusion of embedded mitigation measures, construction noise levels would be below the SOAEL at R58 resulting in no significant effects. Measures to control noise are outlined in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12], to be secured through a Requirement in Schedule 2 of the Draft Development Consent Order (DCO) [EN010168/APP/3.1]. Without mitigation, noise relating to

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		You would need to buy mature trees , build bungs and put proper screening as opposed to the low budget screening on other projects that you have been involved with. But even with these improvements I can't see how many local businesses can co exist. You used an agent to send out letters in an aggressive manor specifically straight after I sent a letter of objection to the project to lime down. By not being up front about potential cable routes with looming threats of compulsory purchase orders you have caused a great deal of stress to me my family and neighbours. I just don't believe it will ever happen and this is merely box ticking . Your intention is to dig up thousands of acres of perfectly good farming land that already has hedges headlands woodlands joining it ! I don't believe for one minute that's your not just ticking boxes. Maybe you can refund all the locals the % that their properties will drop because of your development		horizontal directional drilling (HDD) during the construction phase has been identified as likely to result in significant adverse effects (an exceedance of SOAEL) during the night at the majority of identified sensitive receptors within 500m of activities. However, it should be noted that this identification of a likely significant effect is precautionary as it is expected that HDD activities outside of the daytime period would only be required if there is a clear and obvious benefit, such as for safety reasons or to avoid daytime disruption to many people or in the case of the railway crossings (Great Western Rail) if required by the asset owner. With mitigation, the anticipated effect is reduced to not significant. No significant effects regarding noise are anticipated as a result of construction traffic. It is anticipated that all construction vibration effects at nearby sensitive receptors would be not significant. In terms of the comment that the buffer zones are unclear, these are shown within the Outline Landscape and Ecological Mitigation Plan (LEMP) [EN010168/APP/7.18].

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				In response to the comment that screening looks minimal, the LEMP [EN010168/APP/7.18] sets out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme. In terms of the concern regarding house prices, in 2014, the Centre for Economics and Business Research and Renewable UK conducted a study of over one million homes in the UK to analyse the effect of wind farms on house prices. It found that onshore wind farms had no impact on the value of residential properties within a 5km radius. Given solar panels are less obtrusive than wind turbines, we are confident that local property prices will not be affected by the Scheme. Effects on property value is not something taken into account by the Secretary of State when deciding the application, in accordance with s104 of the Planning Act 2008. As such, impacts on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be

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				scoped out of assessment in the Environmental Statement (ES) (see Consultation Report Appendix B: EIA Scoping [EN010168/APP/5.2]). This is because there is no empirical evidence that industrial scale solar farms cause significant long-term adverse effects on property prices. In terms of the comment that grazing sheep is unrealistic, there are no known covenants that would prevent the land beneath the Solar PV Panels being grazed by sheep. There may therefore be opportunity for some continued agricultural use throughout the operation phase. The impact of the Scheme on businesses has been assessed in ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]. The assessment acknowledges the moderate adverse (significant) effect on Park Farm. Mitigation measures have been included to limit visual, noise and transport impacts which are contained within the Outline CEMP [EN010168/APP/7.12]. In terms of the concern regarding the loss

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				of agricultural land, the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Soils and Agriculture. BMV land was a key consideration in the site selection process, with details set out in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. The areas of each ALC grade affected by the Scheme are set out in Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. The ALC grades are mapped in ES Volume 2, Figure 17-2 [EN010168/APP/6.2]. The majority of area within the Solar PV Sites is Subgrade 3b and Grade 4 which is not BMV land. A Soils and Agriculture assessment is contained within ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]. Measures are contained within the Outline Soil Resources Management Plan [EN010168/APP/7.15] to minimise the impacts of construction on soils.