



Lime Down

Solar Park

Potential Main Issues for Examination

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Revision 1

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1 Introduction

1.1 Overview

- 1.1.1 This Potential Main Issues for Examination (PMIE) document has been prepared on behalf of Lime Down Solar Park Limited (the Applicant) in relation to an application for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). In accordance with the Planning Act 2008 (PA 2008) (Ref 1), the DCO application is submitted to the Planning Inspectorate, with the decision on whether to grant consent being made by the Secretary of State for Energy Security and Net Zero (the Secretary of State).
- 1.1.2 The Scheme comprises a solar photovoltaic (PV) electricity generating station of over 50 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) Area, substations, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases.
- 1.1.3 The PV electricity generating station and BESS Area are located within five land parcels referred to as Lime Down A, B, C, D and E (Solar PV Sites). Grid connection infrastructure is located within the Cable Route Corridor, which is where the Grid Connection Cables would be located to connect the Solar PV Sites to the National Grid at the existing Melksham Substation (Existing National Grid Melksham Substation).
- 1.1.4 The Scheme also includes Highways Improvements Areas where sections of the highway network will contain localised improvements to support the movement of construction vehicles along construction vehicle routes to the Site.
- 1.1.5 The elements and location of the Scheme are set out in **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]**, **ES Volume 2, Figure 1-2: The Order Limits [EN010168/APP/6.2]** and described further in **ES Volume 1, Chapter 2: The Order Limits [EN010168/APP/6.1]** and **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**.
- 1.1.6 The Scheme is classed as a Nationally Significant Infrastructure Project (NSIP) under s14(1)(a), s15(1) and s15(2) of the PA 2008 (Ref 1), as it consists of the construction of an onshore generating station in England exceeding 50 megawatts (MW), and requires an application for a DCO under the PA 2008.

1.2 Purpose of this document

- 1.2.1 The Planning Inspectorate introduced a new pre-application service for Nationally Significant Infrastructure Projects (NSIPs) in May 2024 (last updated 30 May 2025) and published guidance entitled the 'Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus' (Ref 2). The guidance expects the Applicant to produce and maintain an Issues Tracker throughout the pre-application stage which will culminate in a list of Potential Main Issues for

the Examination (PMIE) which will be entered into the examination as an application document (this document).

- 1.2.2 The function of this PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The guidance states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document is separate from the Initial Assessment of Principal Issues (IAP) developed by the Examining Authority but may influence its content.
- 1.2.3 The guidance also states that the PMIE document will inform the production of Statements of Common Ground which will be prepared by the Applicant during the pre-examination stage, should the DCO application be accepted for Examination by the Planning Inspectorate.
- 1.2.4 In accordance with the guidance, the degree of risk associated with each issue identified in the tracker has been allocated a 'RAG' (red, amber, green) status. The RAG rating is as follows:
 - **Red** – High risk - unlikely to be resolved before the close of examination stage;
 - **Amber** – Medium risk - likely to be resolved before the close of examination stage; and
 - **Green** – Low risk - highly likely to be resolved before the close of examination stage.
- 1.2.5 The issues identified within this PMIE document have been identified through a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with key stakeholders. The Applicant has engaged with the relevant statutory bodies and local authorities throughout the preparation of the DCO application and will continue to do so during the Examination stage, through the production of Statements of Common Ground to resolve remaining issues.
- 1.2.6 The Applicant sent letters to the relevant statutory bodies and local authorities in August 2025 that set out the potential main issues that had been identified and requesting feedback or confirmation that the issues identified were correct.
- 1.2.7 Letters were sent to the following statutory bodies and local authorities:
 - Cotswold National Landscape Board;
 - Environment Agency;
 - Historic England;
 - National Grid Electricity Transmission;

- National Highways;
- Natural England;
- Network Rail;
- South Gloucestershire Council;
- Wessex Water; and
- Wiltshire Council.

1.2.8 Two types of letters were sent to these statutory bodies and local authorities, depending on the types of issues identified, as set out below:

- **PMIE's identified** – Notwithstanding that some statutory consultees and local authorities raised multiple issues, the Applicant identified only those issues considered to be potential main issues for examination and provided those in tabular form to statutory consultees and local authorities. The letters requested confirmation that the PMIE's identified were correct, and whether the relevant statutory body or local authority wished to raise any further PMIE's that would be added to this document. Where additional issues have been raised, but RAG rated as green (highly likely to be resolved before the close of examination stage), these have not been included in this document but instead will be added to the relevant Statement of Common Ground; and
- **No PMIE's identified** - For some of the statutory bodies and local authorities, the Applicant did not identify any PMIE's. However, a letter was still sent to these statutory bodies and local authorities in order to provide an opportunity to raise any further issues or highlight where issues had not been identified.

1.2.9 **Table 1-1** below sets out the statutory bodies and local authorities that were sent letters, the type of letter they received, the date they were consulted and the date they responded. Copies of the letters sent to the relevant statutory bodies and local authorities can be found at Annex A of this document. Copies of the responses received from the relevant statutory bodies and local authorities can be found at Annex B of this document.

Table 1-1: Consultation on Potential Main Issues for Examination

Statutory body or local authority	Type of PMIE letter	Date consulted	Date responded
Cotswold National Landscape Board	PMIE's identified	8 August 2025	14 August 2025
Environment Agency	PMIE's identified	8 August 2025	19 August 2025

Statutory body or local authority	Type of PMIE letter	Date consulted	Date responded
Historic England	PMIE's identified	8 August 2025	19 August 2025
National Grid Electricity Transmission	No PMIE's identified	8 August 2025	12 August 2025
National Highways	No PMIE's identified	8 August 2025	15 August 2025
Natural England	PMIE's identified	8 August 2025	20 August 2025
Network Rail	No PMIE's identified	8 August 2025	No response
South Gloucestershire Council	No PMIE's identified	14 August 2025	No response
Wessex Water	No PMIE's identified	8 August 2025	14 August 2025, 19 August 2025 and 8 September 2025
Wiltshire Council	PMIE's identified	8 August 2025	22 August 2025

1.2.10 This document has been prepared taking into account the responses received to the letters sent.

1.2.11 This PMIE document is structured as follows:

- Chapter 1: Introduction – sets out the purpose of this document and the relevant statutory bodies and local authorities consulted;
- Chapter 2: Potential Main Issues for Examination – sets out all issues contained on the pre-application issues tracker for each key stakeholder, along with a RAG rating, and responses from each key stakeholder, if one was provided;
- Annex A – provides copies of the letters sent to the relevant statutory bodies and local authorities; and
- Annex B – provides copies of the responses received from the statutory bodies and local authorities to the letters sent.

2 Potential Main Issues for Examination

2.1 Overview

- 2.1.1 This section includes a set of tables which identify the PMIE's for each of the relevant statutory bodies and local authorities consulted, which were initially identified by the Applicant through a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with key stakeholders, followed by any further issues identified in response to the PMIE letters issued.
- 2.1.2 The tables below are based on the Potential Main Issues for Examination template set out on the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (Ref 2), and are structured according to whether any PMIE's were initially identified by the Applicant, or whether the statutory body or local authority identified any further issues.
- 2.1.3 Each sub-section below identifies the PMIE's for each relevant statutory body or local authority.

2.2 Cotswold National Landscape Board

2.2.1 In response to the letter sent by the Applicant to the Cotswold National Landscape (CNL) Board, the CNL Board confirmed that the issues identified were correct, however also raised additional PMIE’s that they wished to be added to the PMIE document. These additional issues are set out in Table 2-1 below, alongside a RAG rating and the Applicant’s position.

Table 2-1: Cotswold National Landscape Board Potential Main Issues for Examination

Reference	Description of Issue	Applicant’s position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
CNL1	The Board considers that the proposal for the Scheme as consulted upon has the potential to give rise to significant adverse environmental effects upon the CNL designation and its setting. It would also fail to further the purpose of the CNL designation in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000.	<p>As set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] there is no physical overlap between the Scheme and the CNL, and consequently the Scheme causes no direct impacts on the CNL.</p> <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken and informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL Board and Wiltshire Council. Embedded mitigation measures relating to the CNL include:</p> <ul style="list-style-type: none">• avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views;• protection of the existing landscape through buffers and offsets;• Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the	The CNL Board confirmed that issues CNL1-CNL6 are still issues for resolution/agreement and that there are no further comments on these items at this stage.	<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p> <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>restoration of dry-stone walls and creation of new ponds; and</p> <ul style="list-style-type: none"> Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] concludes that there are no significant direct effects on the CNL or its Special Qualities as a result of the Scheme.</p>			
CNL2	The Board considers that Solar PV Panels should be removed from several fields that form part of the Solar PV Sites, in particular Fields 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.	The Design Approach Document [EN010168/APP/7.3] explains that Solar PV Panels within Fields A11, A12, C2, C3 and C4 have been removed to avoid significant adverse landscape and visual effects on the CNL and its setting. Field A11 and A12 on the boundary of the CNL will provide habitat enhancement to further the purpose of the CNL designation, as informed by the CNL Management Plan and the Cotswolds National Landscape (AONB) Landscape Strategy and Guidelines'. However, Fields C2, C3 and C4 have been removed from the Order Limits of the Scheme and will not be used for habitat enhancement.		<p>Design Approach Document [EN010168/APP/7.3]</p> <p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p>	Likely to be resolved before the close of examination stage.
CNL3	Pending the results of further assessment, 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.	<p>The Design Approach Document [EN010168/APP/7.3] explains that Solar PV Panels in the remainder of Field C6 have been removed from the Scheme and will be retained for habitat mitigation and enhancement.</p> <p>As part of the assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] the visibility of Solar PV Panels in Field C7 has been tested through the production of a series of</p>		<p>Design Approach Document [EN010168/APP/7.3]</p> <p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>sections to inform both the CNL Board Technical Officer and the Wiltshire Council Landscape Officer on the potential visibility of Solar PV Panels from agreed locations (coordinated with the locations of the previously agreed Viewpoints and one additional) within the CNL. Visualisations from these viewpoints are submitted alongside ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and have been used to inform the assessment.</p> <p>Field C9 remains unchanged from the design shown at statutory consultation, and the remainder of it will still include Solar PV Panels. As set out in ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] enhancement measures, in the form of wildflower meadows, are proposed to enhance the landscape character on the edge of the CNL, including the southwestern part of field C9.</p>			
CNL4	Construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty.	The most appropriate routes to the Site for construction traffic in terms of highway geometry and road classification include roads within the CNL, including A-Roads and B-Roads, which accommodate existing HGV movements. Less appropriate roads, in terms of highway geometry and suitability for HGV traffic would have to be utilised if all movement was to avoid the CNL. ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] provides an assessment of effects of construction traffic on the CNL.		ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]	Likely to be resolved before the close of examination stage.
CNL5	Comments relate to Receptor: TR039, The Avenue, Alderton, in relation to a short section of road running to the east of Alderton on the edge of the Cotswold	The Design Approach Document [EN010168/APP/7.3] explains that Field C2, C3 and C4 have been removed from the		Design Approach Document [EN010168/APP/7.3]	Likely to be resolved before the close of

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
	<p>National Landscape. At the northern end of the section, the road connects to Church Street at Viewpoint 26 (VP26) as shown on Figure 8-10-2 of the PEIR. Although panels have been removed from Field C1 and the western part of Field C6, the Accurate Visual Representation 1 (AVR1) visualisation at Figure 8-14-26 of the PEIR shows likely visibility of the panels in Field C2 in views from VP26. This would be avoided with the removal from panels from C2 as recommended above to avoid significant adverse impacts from other viewpoints.</p> <p>The CNL Board recommendation is to remove all panels from Field C2 on the northern side of the ridge running through the field or in areas where skyline effects would be apparent and identify these fields for habitat enhancement.</p>	<p>Scheme, and will therefore will not be used for habitat enhancement.</p>			examination stage.
CNL6	<p>Comments relate to Receptor: TR038 Alderton Road, Luckington in relation to a rural road between Alderton and the Fosse Way which forms the boundary of the Cotswold National Landscape. Viewpoint 25(VP 25) as shown on Figure 8-10-2 of the PEIR is located at the eastern end at the junction with the Fosse Way.</p> <p>The CNL Board agree that there would be a significant adverse effect at construction and year 1.</p> <p>The CNL Board support the exclusion of all of, or parts of, fields C6, C8, C9 and C10 for habitat enhancement. We wish to reserve judgment as to the potential impact of the panels located within the southern part of field remainder of C6 and C7 and C9 until further assessment has been carried out using wintertime photography.</p>	<p>The landscape and visual effects of the Scheme on Receptor: TR038 Alderton Road are assessed within ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]. The assessment identifies a moderate adverse effect on TR038, Alderton Road, Luckington during construction and at Year 1 Operation, however effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. Once mitigation planting matures the magnitude of change would reduce and the effects at Year 15 would reduce to minor and neutral, with no effects identified during decommissioning. As such, there would be no significant long-term effects on TR038 Alderton Road, Luckington.</p> <p>The Design Approach Document [EN010168/APP/7.3] explains that Solar PV</p>		<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p> <p>Design Approach Document [EN010168/APP/7.3]</p> <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
	The CNL Board recommendation is the possible removal of panels from the remainder of C6 and from C7 and C9 pending the results of further assessment.	<p>Panels in the remainder of Field C6 have been removed from the Scheme and will be retained for habitat mitigation and enhancement.</p> <p>As part of the assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] the visibility of Solar PV Panels in Field C7 has been tested through the production of a series of sections to inform both the CNL Board Technical Officer and the Wiltshire Council Landscape Officer on the potential visibility of Solar PV Panels from agreed locations (coordinated with the locations of the previously agreed Viewpoints and one additional) within the CNL. Visualisations from these viewpoints are submitted alongside ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and have been used to inform the assessment.</p> <p>Field C9 remains unchanged, and the remainder of it will still include Solar PV Panels. As set out in ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] enhancement measures, in the form of wildflower meadows, are proposed to enhance the landscape character on the edge of the CNL, including the southwestern part of field C9.</p> <p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and its related appendices and figures includes viewpoint photography for both Summer and Winter for all viewpoints and can be reviewed by the CNL Board when the DCO application is accepted for Examination.</p>			

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
CNL7	Finalised and agreed details regarding on-site (within the project red line) habitat enhancements including LEMP/CEMP, species lists and maintenance regimes.	<p>The details regarding on-site habitat enhancements, species lists, and maintenance regimes are set out in the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18].</p> <p>Requirement 7 of the Draft DCO [EN010168/APP/3.1] requires that the Scheme must be carried out in accordance with measures set out in the detailed Landscape Environmental Management Plan, which must be substantially in accordance with the Outline LEMP [EN010168/APP/7.18], which will need to be approved by the local authority, who will consult with the Cotswold National Landscape Board in order to discharge the requirement.</p> <p>An Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] sets out measures related to the construction phase, including ecological and landscape protection measures. The Outline CEMP [EN010168/APP/7.12] is secured under Requirement 13 of the Draft DCO [EN010168/APP/3.1].</p>	N/A	<p>Outline CEMP [EN010168/APP/7.12]</p> <p>Outline LEMP [EN010168/APP/7.18]</p> <p>Draft DCO [EN010168/APP/3.1]</p>	Likely to be resolved before the close of examination stage.
CNL8	<p>Agreed details regarding potential appropriate measures to compensate for the residual adverse effects of the development on the natural beauty of the CNL and its setting to enable the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000) to be discharged.</p> <p>In our previous consultation responses, we have highlighted the Secretary of State's duty under Section 85 of the Countryside and Rights of Way Act 2000, as a 'relevant authority', to seek to further the conservation and enhancement of the</p>	<p>As set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] there is no physical overlap between the Scheme and the CNL, and consequently the Scheme causes no direct impacts on the CNL.</p> <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [EN010168/APP/6.3] provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been</p>	N/A	<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p> <p>ES Volume 3, Appendix 8-6 LVIA Assessment of the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
	<p>CNL's natural beauty in determining this DCO application. We would recommend that, as the applicant, Island Green Power prepares its DCO application with the Secretary of State's duty in mind, to as to aid the Secretary of State in discharging the duty when determining the DCO.</p> <p>DEFRA guidance for relevant authorities (referred to in our standing advice attached) states that as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. This goes beyond mitigation and like for like measures and replacement. The proposed measures to further the statutory purpose of a National Landscape should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured.</p> <p>The 'seek to further' duty does not preclude decisions that are 'net harmful' to the natural beauty of a National Landscape. However, positive evidence is required to demonstrate that the relevant authority has, in all the circumstances, sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose.</p> <p>DEFRA guidance also states that consideration should be given to the appropriateness of compensation measures and we note recent cases where compensation has been deemed necessary to ensure that the duty has been adequately</p>	<p>undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL Board and Wiltshire Council. Embedded mitigation measures relating to the CNL include:</p> <ul style="list-style-type: none"> • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views; • protection of the existing landscape through buffers and offsets; • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds; and • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] concludes that there are no significant direct effects on the CNL or its Special Qualities as a result of the Scheme.</p>			

Reference	Description of Issue	Applicant's position	Cotswold National Landscape Board response to the PMIE letter	Signposting to Application Evidence	RAG rating
	<p>discharged in respect of major development proposals where significant residual harm to a National Landscape will arise from the development (an example being the Lower Thames Crossing DCO decision letter, paragraphs 427-437 (link). Compensation can be either (i) direct offsetting (i.e. works on the ground) or (ii) some financial compensation.</p> <p>Once a more comprehensive conclusion can be drawn on the likely scale of residual adverse impact of the proposal on the CNL and its setting (i.e. by resolving the other issues highlighting in the PMIE letter), the Board may wish to discuss the appropriateness of reasonable and proportionate compensation measures to ensure that the statutory purpose of CNL designation can be furthered through the decision-making process and the duty can be met.</p>				

2.3 Environment Agency

2.3.1 In response to the letter sent by the Applicant to the Environment Agency (EA), the EA confirmed that the issues identified was correct, however also raised additional PMIE's that they wished to be added to the PMIE document. These additional issues are set out in Table 2-2 below, alongside a RAG rating and the Applicant's position.

Table 2-2: Environment Agency Potential Main Issues for Examination

Reference	Description of Issue	Applicant's position	Environment Agency response to the PMIE letter	Signposting to Application Evidence	RAG rating
EA1	Requirement for the scope of the pre-ES intrusive ground investigation to include a 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.	<p>ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] presents an assessment of the likely significant effects of the Scheme on ground conditions and contamination, with section 19.7 and 19.8 providing the baseline conditions of the Solar PV Sites and Cable Route Corridor, section 19.10 and 19.12 providing embedded and additional mitigation measures, and section 19.11 setting out the assessment of likely impacts and effects. The chapter concludes that with the embedded and additional mitigation measures described within the Outline CEMP [EN010168/APP/7.12], all identified likely significant effects have been assessed as being not significant.</p> <p>As set out in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1], intrusive ground investigation will be undertaken prior to commencement of construction in areas impacted by identified geohazards and in locations where permanent structures, i.e. substations and BESS Area, are to be deployed. The requirements for pre-construction intrusive ground investigations are set out in the Outline CEMP [EN010168/APP/7.12] which will be secured by Requirement 13 in Schedule 2 of the Draft DCO [EN010168/APP/3.1].</p>	The EA agree that groundwater and contaminated land is a potential main issue for examination and agree with the amber risk rating.	<p>ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]</p> <p>Outline CEMP [EN010168/APP/7.12]</p>	Likely to be resolved before the close of examination stage.
Additional Potential Main Issues for Examination raised by the Environment Agency in their response to the PMIE letter					
EA2	The EA has had productive discussions regarding flood risk, flood modelling, fisheries, biodiversity, geomorphology and	The Applicant considers that all of the EA's comments raised at statutory consultation are addressed within the relevant parts of	N/A	ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]	Highly likely to be resolved before the close of

Reference	Description of Issue	Applicant's position	Environment Agency response to the PMIE letter	Signposting to Application Evidence	RAG rating
	<p>water resources. However, the EA are yet to review further information so cannot confirm if statutory consultation comments have been adequately addressed. If not, then further discussion at Examination would be needed.</p> <p>The EA is confident that this matter is capable of being appropriately addressed within the duration of the Examination period</p>	<p>the Environmental Statement that is submitted with the DCO Application, particularly ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1] and supporting figures and appendices and ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and supporting figures and appendices.</p>		<p>and supporting figures and appendices</p> <p>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and supporting figures (11-1 to 11-8) and appendices (11-1 to 11-9)</p>	examination stage.
EA3	<p>The EA are yet to discuss in detail the proposal to disapply the requirement for Flood Risk Activity Permits through the Development Consent Order.</p> <p>The EA is confident that this matter is capable of being appropriately addressed within the duration of the Examination period.</p>	<p>The Applicant will continue to engage with the EA to discuss the proposal to disapply the requirement for Flood Risk Activity Permits through the Draft DCO [EN010168/APP/3.1].</p>	N/A	<p>Draft DCO [EN010168/APP/3.1]</p>	Highly likely to be resolved before the close of examination stage.

2.4 Historic England

2.4.1 In response to the letter sent by the Applicant to Historic England (HE), HE confirmed that the issues identified was correct, however also raised additional PMIE's that they wished to be added to the PMIE document. These additional issues are set out in Table 2-3 below, alongside a RAG rating and the Applicant's position.

Table 2-3: Historic England Potential Main Issues for Examination

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
HE1	HE does not recommend Horizontal Directional Drilling (HDD) under archaeological remains as they would need to understand the archaeology first and what depth it survives to. HE's concerns relate to potential settling of the ground above and changes to hydrology that may impact the buried archaeology following installation.	<p>An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3], which will be secured by Requirement 12 in Schedule 2 of the DCO.</p> <p>Section 7.3 of the Archaeological Mitigation Strategy explains that trenchless cabling techniques (such as horizontal directional drilling (HDD)) will be employed beneath mitigation area F120 of the Cable Route Corridor (shown on ES Volume 2, Figure 12-2 Archaeological Assets [EN010168/APP/6.2]), in the location of a Scheduled Monument (NHLE: 1018610). The depth of the directional drilling will be informed by the depth of archaeological remains identified within post-determination evaluation trenches, in order to avoid any impacts on potential buried archaeological deposits. If the final design does not allow for trenchless cabling techniques (such as HDD), a Strip, Map and Sample will be employed. This is also set out in ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].</p> <p>A Written Scheme of Investigation (WSI) will be produced during the detailed design stage of the Scheme should the DCO be consented.</p>	Historic England agree that HDD under archaeological remains is a potential main issue for examination and agree with the amber risk rating.	<p>ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]</p> <p>ES Volume 2, Figure 12-2 Archaeological Assets [EN010168/APP/6.2]</p> <p>ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3]</p>	Likely to be resolved before the close of examination stage.
HE2	Concerns raised about the potential impact of the Scheme on the setting of the Bradfield Manor Farm, a Grade I listed building.	ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and ES Volume 3, Appendix 12-1 Heritage Statement [EN010168/APP/6.3] explain that since the design presented at the	Historic England agree that the impact of the Scheme on the setting of the Bradfield Manor House is a potential main issue for	ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>statutory consultation, Solar PV Panels have been removed entirely from the southernmost part of Field D5 (the field nearest Bradfield Manor Farm). Solar PV Panels will be present throughout the remainder of Lime Down D to the north-west, north and north-east.</p> <p>Throughout Lime Down D, screening has been proposed, including the enhancement of existing hedgerows throughout. Along the southern and south-eastern boundaries of Fields D1-D3, a new woodland belt will be established which will help screen the Scheme from Bradfield Farmhouse. Within the southernmost part of Field D5 adjacent to Bradfield Farmhouse, a new native woodland block will also be created, which recreates a former woodland block which was once present within this area, as illustrated on the 1841 Hullavington Tithe Plan.</p> <p>ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and ES Volume 3, Appendix 12-1 Heritage Statement [EN010168/APP/6.3] sets out that from ground level, the proposed mitigation will provide further screening, in addition to the existing coverage provided by trees within and adjacent the property, between Bradfield Manor Farmhouse and Lime Down D. However, views from the 3-storey parlour block appear to have been designed to provide views of the surrounding agrarian landscape, and the placement of Solar PV Panels within areas further north and north-east of Lime Down D are likely to be partially visible from this part of the farmhouse, due to the gentle rising in the landscape within these directions and, as a result, changing the</p>	<p>examination and agree with the amber risk rating.</p>	<p>ES Volume 3, Appendix 12-1 Heritage Statement [EN010168/APP/6.3]</p>	

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>wider agricultural setting of this asset. However, this intervisibility is expected to be reduced upon the implementation of the proposed mitigation, largely due to the proposed new woodland belts and blocks within Lime Down D, as well as the enhancement of existing hedgerows across the Scheme.</p> <p>Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening of views to and from Bradfield Manor Farmhouse, as set out in ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and ES Volume 3, Appendix 12-1 Heritage Statement [EN010168/APP/6.3].</p> <p>It is therefore considered that there will be less than substantial harm to the significance and setting of Bradfield Manor Farmhouse. Due to the mitigation implemented within the project design, this is assessed at the lower end of the scale.</p>			
HE3	<p>As part of the DCO submission, HE expect to see:</p> <ul style="list-style-type: none"> Detailed impact assessments for designated heritage assets that may be affected by the proposals (Historic England would review impacts on the highly graded assets within our remit) Results of archaeological evaluation with assessment of the significance of remains. 	<p>As part of the DCO application, the Applicant has submitted:</p> <ul style="list-style-type: none"> ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and associated figures and appendices, including: ES Volume 2: Figure 12-1 Designated and Non Designated Heritage Assets Scoped in for Assessment [EN010168/APP/6.2]; 	N/A	<p>ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]</p> <p>ES Volume 2: Figure 12-1 Designated and Non Designated Heritage Assets Scoped in for</p>	Highly likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
	<ul style="list-style-type: none">• A Draft Archaeological Mitigation Statement• Overarching Written Scheme of Investigation.• Details on off-site ecology and biodiversity net gain mitigation proposals.	<ul style="list-style-type: none">• ES Volume 2: Figure 12-2 Archaeological Assets [EN010168/APP/6.2];• ES Volume 2: Figure 12-3 Historic Landscape Character [EN010168/APP/6.2];• ES Volume 3: Appendix 12-1 Heritage Statement [EN010168/APP/6.3];• ES Volume 3: Appendix 12-2a Archaeological Desk Based Assessment Solar PV Sites [EN010168/APP/6.3];• ES Volume 3: Appendix 12-2b Archaeological Desk Based Assessment Cable Route Corridor [EN010168/APP/6.3];• ES Volume 3: Appendix 12-3 Air Photo and LiDAR Mapping and Interpretation [EN010168/APP/6.3];• ES Volume 3: Appendix 12-4a Archaeological Geophysical Survey Report Solar PV Sites;• ES Volume 3: Appendix 12-4b Archaeological Geophysical Survey Report Cable Route Corridor;• ES Volume 3: Appendix 12-5 Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3] (Parts 1 to 5);• ES Volume 3: Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3];• ES Volume 3: Appendix 12-7 Historic Landscape Character Assessment [EN010168/APP/6.3];• ES Volume 3: Appendix 12-8 Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]; and• ES Volume 3: Appendix 12-9 Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3].		<p>Assessment [EN010168/APP/6.2]</p> <p>ES Volume 2: Figure 12-2 Archaeological Assets [EN010168/APP/6.2]</p> <p>ES Volume 2: Figure 12-3 Historic Landscape Character [EN010168/APP/6.2]</p> <p>ES Volume 3: Appendix 12-1 Heritage Statement [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-2a Archaeological Desk Based Assessment Solar PV Sites [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-2b Archaeological Desk Based Assessment Cable Route Corridor [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-3 Air Photo and LiDAR Mapping and</p>	

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>These documents will contain the detailed impact assessment for designated heritage assets, and the result of archaeological evaluation with assessment of the significance of remains.</p> <p>A Written Scheme of Investigation (WSI) will be produced during the detailed design stage of the Scheme following consent should it be granted by the Secretary of State.</p> <p>There will not be any off-site ecology as all ecological mitigation and enhancement areas are included within the Order limits. Biodiversity net gain proposals are set out in the Biodiversity Net Gain Assessment Report [EN010168/APP/7.8].</p>		<p>Interpretation [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-4a Archaeological Geophysical Survey Report Solar PV Sites</p> <p>ES Volume 3: Appendix 12-4b Archaeological Geophysical Survey Report Cable Route Corridor</p> <p>ES Volume 3: Appendix 12-5 Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3] (Parts 1 to 5)</p> <p>ES Volume 3: Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-7 Historic Landscape Character Assessment [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-8</p>	

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
				<p>Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]</p> <p>Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]</p>	
HE4	<p>HE wishes to see evidence of the potential impacts on Bradfield Manor following the removal of Solar PV Panels from proximity to the Bradfield Manor in Field D5. Once the omitted southern portion of D5 has been determined and amended on plan, together with details and the extent of the further landscape mitigation, HE would still need to see some visualisations to demonstrate what would be visible from Bradfield Manor. HE would then be able to advise further and suggest any additional amendments or mitigation that would minimise or remove the harm.</p>	<p>ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and its associated figures and appendices contains the assessment of impacts on Bradfield Manor following the removal of Solar PV Panels from Field D5. The Design Approach Document [EN010168/APP/7.3] provides further context on the design evolution of the Scheme.</p>	N/A	<p>ES Volume 1: Chapter 12: Cultural Heritage [EN010168/APP/6.1]</p> <p>Design Approach Document [EN010168/APP/7.3]</p> <p>ES Volume 2: Figure 12-1 Designated and Non Designated Heritage Assets Scoped in for Assessment [EN010168/APP/6.2]</p> <p>ES Volume 2: Figure 12-2 Archaeological Assets [EN010168/APP/6.2]</p> <p>ES Volume 2: Figure 12-3 Historic Landscape Character [EN010168/APP/6.2]</p> <p>ES Volume 3: Appendix 12-1 Heritage Statement [EN010168/APP/6.3]</p>	Highly likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
				<p>ES Volume 3: Appendix 12-2a Archaeological Desk Based Assessment Solar PV Sites [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-3 Air Photo and LiDAR Mapping and Interpretation [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-4a Archaeological Geophysical Survey Report Solar PV Sites</p> <p>ES Volume 3: Appendix 12-4b Archaeological Geophysical Survey Report Cable Route Corridor</p> <p>ES Volume 3: Appendix 12-5 Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3] (Parts 1 to 5)</p> <p>ES Volume 3: Appendix 12-6</p>	

Reference	Description of Issue	Applicant's position	Historic England response to the PMIE letter	Signposting to Application Evidence	RAG rating
				<p>Outline Archaeological Mitigation Strategy [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-7 Historic Landscape Character Assessment [EN010168/APP/6.3]</p> <p>ES Volume 3: Appendix 12-8 Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]</p> <p>Design Approach Document [EN010168/APP/7.3]</p>	

2.5 National Grid Electricity Transmission

2.5.1 In their letter to National Grid Electricity Transmission (NGET), the Applicant explained that they did not identify any PMIE's from NGET following their review of consultation responses or ongoing engagement. NGET responded that they wished to include further PMIE's in the PMIE document. These are set out in Table 2-4 below.

Table 2-4: National Grid Electricity Transmission Potential Main Issues for Examination

Reference	Description of Issue	Applicants' view on the likelihood of issue being resolved during examination	Signposting to Application Evidence	RAG rating
NGET1	<p>NGET believe that as a minimum that 'Protective Provisions' should be included as a potential main issue; NGET stipulate that adequate PPs will be required to be included in the order but reserve our position in relation to other issues we identify once we've had sight of the final documentation.</p> <p>NGET requires its preferred form of Protective Provisions 'to be included within the DCO to ensure that its existing assets and interests [and future assets/interests, where required] are adequately protected, as well as to ensure compliance with relevant safety standards.</p>	Discussions regarding protective provisions are ongoing and the Applicant aims to agree these during examination. The agreed and final protective provisions will be set out in the Draft DCO [EN010168/APP/3.1] which will be updated during Examination.	Draft DCO [EN010168/APP/3.1]	Likely to be resolved before the close of examination stage.
NGET2	NGET has not been provided with the draft DCO documentation as yet and is therefore unable to advise on whether there are any additional potential issues of concern. NGET reserves the position in relation to other issues we identify once we've had sight of the final documentation.	The Draft DCO [EN010168/APP/3.1] is submitted with the DCO application for the Scheme and will be published if the DCO application is accepted for Examination by the Planning Inspectorate. NGET can register to be an Interested Party in the Examination and submit a relevant representation setting out their comments relating to the Draft DCO [EN010168/APP/3.1] .	Draft DCO [EN010168/APP/3.1]	Highly likely to be resolved before the close of examination stage.

2.6 National Highways

- 2.6.1 In their letter to National Highways, the Applicant explained that no PMIE's had been identified, and in their response National Highways confirmed that they have not identified any issues with the Scheme that require logging for consideration at Examination. National Highways did however raise further issues, although did not identify them as PMIE's, therefore these issues will be set out in the Statement of Common Ground with National Highways.

2.7 Natural England

2.7.1 In response to the letter sent by the Applicant to Natural England (NE), NE confirmed that the issues identified were correct, however also raised additional PMIE’s that they wished to be added to the PMIE document. These additional issues are set out in Table 2-5 below, alongside a RAG rating and the Applicant’s position.

Table 2-5: Natural England Potential Main Issues for Examination

Reference	Description of Issue	Applicant’s position	Natural England response to the PMIE letter	Signposting to Application Evidence	RAG rating
NE1	Concern that areas of Lime Down C are visible from the Cotswolds National Landscape (CNL) and footpaths extending from the National Landscape to the wider countryside. The topography makes it a more sensitive part of the site with panels in this area more likely to have adverse landscape and visual effects.	<p>The Design Approach Document [EN010168/APP/7.3] explains that the Scheme design is the result of an iterative process that has evolved in response to stakeholder engagement, consultation feedback, and technical studies, a design vision and design principles which have guided the design to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application. A key design principle for the Scheme has been to make sure the design of the Scheme is ‘Landscape Led’ and gives due weight to the intrinsic character and beauty of the surrounding countryside.</p> <p>The Design Approach Document [EN010168/APP/7.3] explains that Solar PV Panels in Field C1, part of Field C6, Field C8, part of Field C9, and most of Field C10 have been removed since statutory consultation, along the southern and western edges of Lime Down C to minimise effects on the setting of the CNL, and these fields will instead be used for mitigation and enhancement planting. However, field parcels C2, C4 and C3 which contained Solar PV Panels at statutory consultation have been removed from the Order Limits to minimise effects on the CNL and its setting and will therefore will not be used for habitat enhancement.</p>	Natural England agree that Lime Down C in relation to the CNL is a potential main issue for examination and agree with the amber risk rating.	<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p> <p>ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]</p> <p>Design Approach Document [EN010168/APP/7.3]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Natural England response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] provides an assessment of the Scheme's likely landscape and visual impacts on the CNL and sets out given there is no physical overlap between the Scheme and the CNL, consequently the Scheme causes no direct impacts on the CNL. In terms of public receptors that have a visual relationship with the CNL, ie, public rights of way, ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] concludes that there are no significant effects on public receptors associated with the Scheme and the CNL, which is predominantly as a result of the measures incorporated into the Scheme to avoid harm to the CNL. Furthermore, ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] concludes that there would be no significant effects on the special qualities of the CNL as a result of the Scheme.</p>			
NE2	Recommended that the extent of panels within Lime Down C is reviewed to avoid adverse landscape and visual effects on the CNL. Where panel areas are reduced, this should be used to provide landscape and ecological enhancements, particularly for lesser horseshoe bats.	The Design Approach Document [EN010168/APP/7.3] explains that Solar PV Panels in Field C1, part of Field C6, Field C8, part of Field C9, and most of Field C10 have been removed since statutory consultation, along the southern and western edges of Lime Down C to minimise effects on the setting of the CNL, and these fields will instead be used for mitigation and enhancement planting. However, field parcels C2, C4 and C3 which contained Solar PV Panels at	Natural England agree that Lime Down C in relation to the CNL is a potential main issue for examination and agree with the amber risk rating.	<p>ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]</p> <p>The Design Approach Document [EN010168/APP/7.3]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Natural England response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>statutory consultation have been removed from the Order Limits to minimise effects on the CNL and its setting and will therefore will not be used for habitat enhancement.</p> <p>ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] presents an assessment of the Scheme on bats including lesser horseshoe bats and concludes that there are no significant effects as a result of the Scheme.</p>			
Additional Potential Main Issues for Examination raised by Natural England in their response to the PMIE letter					
NE3	<p>Bath and Bradford on Avon Bats SAC</p> <p>Proposals are yet to be finalised for the Melksham Substation and the Cable Route search area including working methods and avoidance and mitigation proposals. Further, consideration of the areas of the site which are functionally linked to the SAC is still being undertaken. A full assessment of the potential impacts of the proposed development has therefore not yet been possible.</p>	<p>Since the PEIR the proposals for works at the Existing National Grid Melksham Substation and the Cable Route Corridor have been refined and are included within the assessment of environmental effects in the Environmental Statement and the Habitats Regulations Assessment. A full assessment of the Bath and Bradford on Avon Bats SAC is set out in the Habitats Regulations Assessment Report [EN010168/APP/7.10] which was shared with Natural England before submission of the DCO application.</p>	N/A	<p>Habitats Regulations Assessment [EN010168/APP/7.10]</p>	Likely to be resolved before the close of examination stage.
NE4	<p>Severn Estuary Ramsar</p> <p>The extent and scope of the water crossing for the pipeline route and assessment of the potential impact of EMFs on eels (a feature of the Severn Estuary Ramsar) has not yet been provided. A full assessment of the potential impacts of the proposed development on the Ramsar has therefore not yet been possible.</p>	<p>A full assessment of the Scheme's impacts on the Severn Estuary Ramsar, including potential impacts of EMF's on eels is set out in the Habitats Regulations Assessment Report [EN010168/APP/7.10] which was shared with Natural England before submission of the DCO application.</p>	N/A	<p>Habitats Regulations Assessment Report [EN010168/APP/7.10]</p>	Likely to be resolved before the close of examination stage.
NE5	<p>Landscape</p> <p>In addition to Natural England's advice regarding Lime Down C highlighted in Appendix A of the PMIE, Natural</p>	<p>The Scheme design has evolved from the PEIR stage and Solar PV Panels were removed in fields A11 and A12 in order to protect the CNL and its setting. Fields A11</p>	N/A	<p>Design Approach Document [EN010168/APP/7.3].</p>	Highly likely to be resolved before the close of

Reference	Description of Issue	Applicant's position	Natural England response to the PMIE letter	Signposting to Application Evidence	RAG rating
	England's advice provided in response to the Preliminary Environmental Information Report consultation highlighted that Lime Down A is directly adjacent to the Cotswolds National Landscape with panels proposed in the northern extent of Lime Down A likely to be visible from the National Landscape. Subsequently, our advice was that panels are removed from these fields to reduce effects on the National Landscape.	and A12 will be planted instead. This is set out in the Design Approach Document [EN010168/APP/7.3] . ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] provides an assessment of the Scheme's likely landscape and visual impacts on the CNL and sets out given there is no physical overlap between the Scheme and the CNL, consequently the Scheme causes no direct impacts on the CNL. Furthermore, ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] concludes that there would be no significant effects on the special qualities of the CNL as a result of the Scheme.		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]	examination stage.
NE6	Soils and Best and Most Versatile Agricultural Land Natural England's advice provided in response to the PEIR consultation noted that further soil surveys, including surveys the cable route corridor, are underway, this information is needed to inform development proposals and demonstrate impacts to BMV land have been avoided as far as practicable. This information should be used to inform a commitment to return BMV land required temporarily for the development to its original grade post development.	The Outline Soil Resource Management Plan [EN010168/APP/7.15] sets out that measures required to ameliorate soils to ensure the original land quality is achieved upon reinstatement will be set out in the detailed Soil Resource Management Plan which will be secured by Requirement 17 of the Draft DCO [EN010168/APP/3.1] .	N/A	Outline Soil Resource Management Plan [EN010168/APP/7.15] Draft DCO [EN010168/APP/3.1]	Likely to be resolved before the close of examination stage.

2.8 Network Rail

- 2.8.1 In their letter to Network Rail, the Applicant explained that they did not identify any PMIE's from Network Rail following their review of consultation responses or ongoing engagement. Network Rail did not provide a response to the PMIE letter and did not identify any additional PMIE's.

2.9 South Gloucestershire Council

- 2.9.1 In their letter to South Gloucestershire Council, the Applicant explained that they did not identify any PMIE's from South Gloucestershire Council following their review of consultation responses or ongoing engagement. South Gloucestershire Council did not provide a response to the PMIE letter and did not identify any additional PMIE's.

2.10 Wessex Water

- 2.10.1 In their letter to Wessex Water, the Applicant explained that they did not identify any PMIE's from Wessex Water following their review of consultation responses or ongoing engagement. Wessex Water responded that they had previously raised issues which will need to be addressed and requested to add these to the PMIE document with the RAG ratings identified. In relation to items WW3 and WW4, the Applicant would RAG rate these as 'green' given the position set out, however the RAG rating provided by Wessex Water has been reflected in Table 2-6.
- 2.10.2 In addition, Wessex Water provided a further response (item WW5) and requested that this be RAG rated as 'red'. Whilst this is reflected in Table 2-6, the Applicant would RAG rate this issue as amber. This point was also raised in the Scoping Opinion issued on 22 August 2024; **ES Volume 3, Appendix 1-2 Scoping Opinion Response Table [EN010168/APP/6.3]** provides a response to all points raised in the Scoping Opinion, including item WW5 in this document.

Table 2-6: Wessex Water Potential Main Issues for Examination

Reference	Description of Issue	Applicants' position	Signposting to Application Evidence	RAG rating
WW1	Land held freehold by Wessex Water in title WT272836 is associated with our statutory duties as a regulated sewerage undertaker. Any impact of the Scheme on this land will injuriously affect our undertaking.	Land within title WT272836 forms part of the Scheme; discussions regarding protective provisions are ongoing and the Applicant aims to agree these during examination. The agreed and final protective provisions will be set out in the Draft DCO [EN010168/APP/3.1] which will be updated during Examination.	Draft DCO [EN010168/APP/3.1]	Highly likely to be resolved before the close of examination stage.
WW2	Wessex Water's land is held for operational sewage treatment purposed and should therefore be avoided by any cables or works.	Protective provisions will be put in place to ensure that Wessex Water's utilities are protected. Discussions regarding protective provisions are ongoing and the Applicant aims to agree these during examination. The agreed and final protective provisions will be set out in the Draft DCO [EN010168/APP/3.1] which will be updated during Examination.	Draft DCO [EN010168/APP/3.1]	Highly likely to be resolved before the close of examination stage.
WW3	The proposed demand capacity is not available to provide the required demand based on the figures they have provided causing detriment to existing customers across the wider network.	Wessex Water's concerns about the demand capacity for water over the lifetime of the Scheme are addressed in the Outline Water Resources Strategy [EN010168/APP/7.25] which sets out that Bristol Water confirmed that they are able to provide a water connection from an existing 4-inch cast iron water main in a location close to field A1 of the Scheme near Sherston. Bristol Water also confirmed that a flow of 7m3/hour was possible from this connection, which is sufficient to provide the 169m3/day peak water demand required for the Scheme during its construction phase, especially given the conservative estimation of water demands used in this assessment.	Outline Water Resources Strategy [EN010168/APP/7.25]	Unlikely to be resolved before the close of examination stage, but note text in paragraph 2.10.1.
WW4	Raised issue of potential contamination of groundwater supply and requested hydrogeological assessment.	An assessment of the impact of the Scheme on contamination and groundwater supply, is set out in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] . Mitigation and management measures proposed for all stages of the Scheme are set out in the Outline CEMP [EN010168/APP/7.12] , Outline OEMP [EN010168/APP/7.13] and the Outline Decommissioning Strategy [EN010168/APP/7.14] , which are secured through Requirement 13, 14 and 20 retrospectively in the	ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] . Draft DCO [EN010168/APP/3.1]	Unlikely to be resolved before the close of examination stage, but note text in paragraph 2.10.1.

Reference	Description of Issue	Applicants' position	Signposting to Application Evidence	RAG rating
		Draft DCO [EN010168/APP/3.1]. These measures include the provision of temporary drainage systems to prevent runoff and the removal of potentially contaminated waters from the Scheme.	<p>Outline CEMP [EN010168/APP/7.12]</p> <p>Outline OEMP [EN010168/APP/7.13]</p> <p>Outline Decommissioning Strategy [EN010168/APP/7.14].</p>	
WW5	The Scheme is being constructed over the Great Oolite Aquifer and a Hydrogeological Risk Assessment should be undertaken.	<p>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] considers the potential risks to underlying aquifers, with reference to the ES Volume 3, Appendix 11-1 - 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]. That assessment confirms that infrastructure such as BESS, substations, and buried cables will not result in uncontrolled discharges, with pollution control measures incorporated into the drainage design.</p> <p>All photovoltaic arrays/ panels will be certified as PFAS free, meaning there is no risk of mobilisation of PFAS coatings on the panels being leached or otherwise mobilised and entering ground or surface water.</p> <p>An assessment of potential impacts of the Scheme on hydrogeological receptors has been undertaken and is presented in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]. That chapter also addresses the geological sensitivity of the site, pollutant pathways, and aquifer protection measures.</p>	<p>ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]</p> <p>ES Volume 3, Appendix 11-1 - 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]</p> <p>ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]</p>	Unlikely to be resolved before the close of examination stage, but note text in paragraph 2.10.2.

2.11 Wiltshire Council

2.11.1 In response to the letter sent by the Applicant to Wiltshire Council, the Council confirmed that the issues identified were correct, however also raised additional PMIE's that they wished to be added to the PMIE document. These additional issues are set out in Table 2-7 below, alongside a RAG rating and the Applicant's position.

Table 2-7: Wiltshire Council Potential Main Issues for Examination

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
WC1	Additional justification and explanation needed to explain how the Zone of Influence (Zol) for cumulative landscape and visual effects was established within the LVIA methodology.	<p>ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] provides further clarity on the methodology used in the assessment.</p> <p>A cumulative landscape and visual effects assessment is set out in Section 8.13 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1],</p>	<p>Wiltshire Council considers that the identified PMIE issues (references 1-14) of the Appendix have the potential to be resolved prior to the close of the examination, and therefore the "Amber" RAG rating seems appropriate at this stage.</p> <p>Wiltshire Council state however that whether the issues can be resolved will be entirely dependent on the sufficiency of the assessment information and mitigation approach contained within the Environmental Statement (ES), which the council has not yet had an opportunity to review due to it not being available until after DCO application submission and publication. Therefore, there is also the potential that these issues may remain unresolved at the close of the examination.</p>	<p>ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [EN010168/APP/6.1]</p> <p>ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]</p> <p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p>	Likely to be resolved before the close of examination stage.
WC2	Disagree with the decision to not include existing operational solar schemes (identified by the council) on short lists as all large-scale solar development within the cumulative Zol should be scoped into the cumulative landscape assessment.	<p>All existing and committed development has been considered as part of the baseline in the landscape and visual cumulative assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. This is particularly relevant to the 10 km Cumulative Study Area where existing and committed development have not been previously considered as the baseline assessment of the Lime Down Scheme extends to 5 km.</p>		<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]</p> <p>ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
WC3	Concern that the location of developments selected for further assessment are only indicated with a pin marker. Would rather the spatial extents of development areas are included in Figure 21-1 to understand the spatial relationship with the Lime Down areas A to E.	A figure has been prepared to show the planning application boundary for all Solar, BESS, and Substation developments within the 10 km Cumulative Study Area that have been considered as part of the cumulative assessment (ES Volume 2, Figure:8-15-5: Included Cumulative Developments [EN010168/APP/6.2]). Operational developments have not been considered in this figure as these would form part of the existing baseline (set out in ES Volume 2, Figure 8-15-1: Baseline Existing Solar Schemes [EN010168/APP/6.2]). All other types of development will remain marked with pins.		ES Volume 2, Figure:8-15-5: Included Cumulative Developments [EN010168/APP/6.2] ES Volume 2, Figure 8-15-1: Baseline Existing Solar Schemes [EN010168/APP/6.2]	Likely to be resolved before the close of examination stage.
WC4	Further work needed to confirm 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	Representative Viewpoints have been agreed with Wiltshire Council and three additional Viewpoints are included in the landscape and visual assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.
WC5	Should consider 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	Existing operational solar developments are considered as part of the baseline for the assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The additional Viewpoint WC 3 represents the shared intervisibility between Rodbourne Rail Farm and Lime Down A from Footpath WT[MALW]53 and has informed the assessment in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . Cumulative landscape effects in relation to landscape character are appropriately assessed in line with relevant policy and guidance in ES Volume 1, Chapter 8: Landscape and Visual		Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		[EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].			
WC6	Concern that 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 being appropriately considered	The cumulative assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] assesses all Landscape Types and Landscape Character Areas (including the 'Limestone Lowland Type' and its associated 'Landscape Character Areas') which are located within the 10 km Cumulative Study Area.		Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.
WC7	Request that 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 Zol	A figure has been prepared to show the planning application boundary for all Solar, BESS, and Substation developments within the 10 km Cumulative Study Area that have been considered as part of the cumulative assessment (ES Volume 2, Figure:8-15-5: Included Cumulative Developments [EN010168/APP/6.2]). Operational developments have not been considered in this figure as these would form part of the existing baseline (set out in ES Volume 2, Figure 8-15-1: Baseline Existing Solar Schemes [EN010168/APP/6.2]).		ES Volume 2, Figure:8-15-5: Included Cumulative Developments [EN010168/APP/6.2] ES Volume 2, Figure 8-15-1: Baseline Existing Solar Schemes [EN010168/APP/6.2]	Likely to be resolved before the close of examination stage.
WC8	Concerns that the Cable Route Corridor was not refined in the PEIR and that there has 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 such, the ecological baseline of the CRSC hasn't been established	The refinement of the Cable Route Corridor is set out in the Design Approach Document [EN010168/APP/7.3] and ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] which is submitted with the DCO application. These documents set out that the Cable Route Corridor was refined in the lead up to statutory consultation based on a comparative analysis such as the length of the route, the number of road, rail		Design Approach Document [EN010168/APP/7.3] ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] ES Volume 3, Appendices 9-1:	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>watercourse crossings, field boundaries and the agricultural grade of the land.</p> <p>Design principles relating to the adherence to the mitigation hierarchy (Design Principle 2), minimising impacts on amenity (Design Principle 5), protecting the water environment (Design Principle 6), and minimising impacts to PRow (Design Principle 9) provided a framework for design decision making in relation to refinement of the cable route corridor.</p> <p>The analysis undertaken to refine the Cable Route Corridor up to statutory consultation identified a preferred route which avoided the greatest number of constraints, was shorter and has a shorter number of constraint crossings (such as railway/road/PRow crossings). In addition, to minimise potential environmental effects, facilitate construction, and enable construction access, the Cable Route Corridor was expanded at five locations to provide further flexibility in locating the Cable Route Corridor.</p> <p>Following statutory consultation, the Cable Route Corridor was further refined, taking into account the design principles, and potential impacts on factors such as PRow, residential receptors, ponds, watercourses and vegetation, trees and hedgerows, flood risk and drainage, heritage assets, access, soil disturbance and ground contamination. A project update was published on the project website in June 2025 which provided further information on the route of the refined Cable Route Corridor.</p> <p>Ecology survey results for the Cable Route Corridor were shared with Wiltshire Council in August 2025 and the Applicant will continue to engage with Wiltshire Council on this. Survey results are provided within ES Volume 3, Appendices 9-1:</p>		<p>Ecological Baseline Report to 9-6: Otter and Water Vole Survey Report [EN010168/APP/6.2]</p> <p>ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]</p>	

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		Ecological Baseline Report to 9-6: Otter and Water Vole Survey Report [EN010168/APP/6.2] , and have been used to underpin the assessment within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .			
WC9	Lack of surveys for the additional areas at Lime Down C and D and for the CRSC means that 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.	Survey results for these areas were not available at PEIR stage as surveys were ongoing. Completed survey results including additional land at Lime Down C and D, and survey results for the Cable Route Corridor were shared with Wiltshire Council on 26 August 2025 and the Applicant will continue to engage with Wiltshire Council on this. Survey results are provided within ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-6: Otter and Water Vole Survey Report [EN010168/APP/6.3] , and have been used to underpin the assessment within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .		ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-6: Otter and Water Vole Survey Report [EN010168/APP/6.3]	Likely to be resolved before the close of examination stage.
WC10	Concerns that no additional mitigation measures beyond buffer zones are proposed to compensate for the loss of bat foraging habitat even though emerging 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. Therefore recommended that the areas of permanent pasture on the Solar PV Sites should be retained as far as reasonably practicable	The Scheme design has evolved since the PEIR stage and permanent pasture has been retained as far as practicable. Permanent pasture coverage at the Solar PV Sites is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E, split between Lime Down C and E as set out in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . There is considerably less permanent pasture than indicated at PEIR stage. The assessment of impacts on foraging/commuting bats presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] and has		ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3],	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		taken into account emerging research indicating reduced activity over solar farm sites for certain species. The Applicant will continue to discuss this matter with Wiltshire Council.			
WC11	Concerns that the assessment of Bath and Bradford On Avon Bats SAC does not consider the potential presence of Bechstein's bat roosts in the CRSC area despite a Technical Briefing Note being provided on this.	The assessment of impacts on the Bath and Bradford on Avon Bats SAC bats presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] takes into consideration the potential presence of Bechstein's bat roosts. The refinement of the Cable Route Corridor has taken into account the location of the Bechstein's bat roosts and the 1.5 km 'Core Area' around them as presented in the Technical Briefing Note. The Applicant will continue to discuss this matter with Wiltshire Council.		ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3],	Likely to be resolved before the close of examination stage.
WC12	Operation Phase Impacts - The assessment does not fully consider the impact of permanent pasture loss on bat foraging and the fact that a precautionary approach must be taken when considering impacts on bat activity over fields containing solar panels.	The Scheme design has evolved since the PEIR stage and permanent pasture has been retained as far as practicable. Permanent pasture coverage at the Solar PV Sites is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E, split between Lime Down C and E as set out in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] . There is considerably less permanent pasture than indicated at PEIR stage. The assessment of impacts on foraging/commuting bats is presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , and is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] , and has taken into account emerging research indicating reduced activity over solar farm sites for certain species The Applicant will		ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3],	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		continue to discuss this matter with Wiltshire Council.			
WC13	Further information and evidence needed to augment the conclusion put forward in Chapter 9 of no significant adverse effect on foraging / commuting bats during the operational phase.	The assessment of impacts on foraging/commuting bats is presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , and is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] , and has taken into account emerging research indicating reduced activity over solar farm sites for certain species The Applicant will continue to discuss this matter with Wiltshire Council.		ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] ,	Likely to be resolved before the close of examination stage.
WC14	Strongly recommends that the Council is consulted on the mitigation strategy for ground nesting birds.	The Applicant has consulted with Wiltshire Council on the mitigation strategy for ground nesting birds, and notes that the Council agree in principle on the Applicants approach to ground nesting bird mitigation, discussed in a meeting on 14 July 2025 with Wiltshire Council's Ecology Officer. ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.2] was shared with Wiltshire Council on 27 August 2025. Embedded mitigation measures for ground nesting birds are prescribed within the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] and the Outline LEMP [EN010168/APP/7.18] which will be secured in the Draft DCO [EN010168/APP/3.1] . The Applicant will continue to discuss this matter with Wiltshire Council.		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] Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] Outline LEMP [EN010168/APP/7.18] Draft DCO [EN010168/APP/3.1]	Likely to be resolved before the close of examination stage.
WC15	Disagrees with the assumption that concrete feet can be accepted as an adequate mitigation measure as embedded mitigation is not agreed, emphasizing that if solar panels are to be placed over areas of archaeological	An overarching archaeological mitigation strategy is provided which takes account of discussion with the Archaeology Service at Wiltshire Council, and sets out the proposed mitigation for archaeology including avoidance of archaeology where	Wiltshire Council state that the final PMIE issue identified in Appendix A (which the council has assumed to be number 15, but for which no reference number was indicated) relates to the use of concrete feet as an adequate archaeological	ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3]	Highly likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
	sensitivity then these areas must undergo either archaeological area excavations or Strip, Map, and Sample (SMS) as employed for the solar farm at Wick Farm Lacock (20/06840/FUL)	possible in the first instance, followed by Strip, Map and Sample, as set out in ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3] , which will be secured by Requirement 12 in Schedule 2 of the Draft DCO [EN010168/APP/3.1] . A Written Scheme of Investigation (WSI) will be produced during the detailed design stage of the Scheme following consent should it be granted by the Secretary of State.	mitigation measure. Following discussions with the Applicant's consultants, Lanpro, it is understood by Wiltshire Council that potential impacts from solar panels with either be mitigated via scoping out or Strip Map and Record excavation of complex sites and funerary monuments, as well as the customised location of panels to avoid isolated features such as enclosure ditches. Given that Lanpro have agreed to mitigate any archaeologically sensitive areas prior to any construction, and whilst the council will need to satisfy itself that the overarching archaeological mitigation strategy within the ES and subsequent Written Schemes of Investigation (WSI), which the council has not yet had the opportunity to review as not currently available, are sufficient, it is considered that this issue may be able to be RAG rated "Green" provided that the approach indicated above is correct.	Draft DCO [EN010168/APP/3.1]	
Additional Potential Main Issues for Examination raised by Wiltshire Council in their response to the PMIE letter					
WC16	Ecological baseline information and details of mitigation and compensation are not sufficient for an informed and robust review	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] provides the details of the ecological baseline, mitigation and compensation measures that form part of the Scheme. The baseline is set out in section 9.7, mitigation measures are set out in section 9.9 and 9.12, and compensation measures are set out in section 9.12. These ecological avoidance, mitigation and compensation measures are also set out within the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] .	N/A	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]	Likely to be resolved before the close of examination stage.
WC17	Breeding Birds – Fields which have the greatest number of skylark territories, such as Field C10, should not be subject to installation of solar panels, but instead	As set out in section 9.12 of 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	N/A	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
	retained and protected in accordance with the mitigation hierarchy	removed from hosting infrastructure for the Scheme and will be managed sensitively as set out within the ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] 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. Field C10 would be set aside meaning it would be ploughed every two to five years with the resulting habitat comprising patchily vegetated ground, short grasses and arable weeds. Detail of which fields will be included as part of this mitigation is set out in Table 9 11: Skylark Mitigation Calculations in section 9.12 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] .		ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]	
WC18	Great Crested Newt (GCN) - Clarity need on how many ponds are yet to be surveyed around the Solar PV Sites and exactly what survey is outstanding and where. Clarity is also needed on if the DLL route will be used or will surveys be conducted in 2025	<p>Full details of GCN surveys conducted are provided in ES Volume 3, Appendix 9-5: Great Crested Newt Survey Report [EN010168/APP/6.3]. Surveys have confirmed presence of GCN at two ponds within Sites Lime Down C and E, as well as within a further 14 ponds located within 250 m of the Solar PV Sites.</p> <p>As set out in the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] it is proposed to register all works within the Cable Route Corridor under Natural England's District Level Licensing (DLL) for great crested newts as a compensation measure. The land within the entire Order Limits falls within either 'green' or 'amber' Natural England risk zones for GCN and therefore DLL is possible. Furthermore, correspondence with Natural England has confirmed that there is an adequate supply of compensation ponds within Wiltshire to</p>	N/A	<p>ES Volume 3, Appendix 9-5: Great Crested Newt Survey Report [EN010168/APP/6.3]</p> <p>Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>enable DLL to be adopted for the Scheme. Through registration and provision of conservation payment under DLL, adequate compensation through strategic off-site habitat creation will be provided to address all adverse impacts associated with works within the Cable Route Corridor and ensure legal compliance.</p> <p>A large number of ponds are present within 250 m of the Cable Route Corridor. These ponds have not been subject to GCN surveys as the Scheme will adopt DLL for works within the Cable Route Corridor, which assumes the presence of GCN within local waterbodies and provides a framework and compensation measures to reduce and offset impacts on this species.</p>			
WC19	Great Crested Newt – Due to the amount of outstanding survey and gaps in the ecological baseline information, it is not known whether a suitably informed and comprehensive mitigation strategy has been formulated	<p>Full details of GCN surveys conducted are provided in ES Volume 3, Appendix 9-5: Great Crested Newt Survey Report [EN010168/APP/6.3]. Surveys have confirmed presence of GCN at two ponds within Sites Lime Down C and E, as well as within a further 14 ponds located within 250 m of the Solar PV Sites.</p> <p>Mitigation measures for GCN are set out in section 9.9 and 9.12 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19], and section 9.12 and 9.13 concludes that when considering these mitigation measures, which includes supervision, protective measures during construction, sympathetic habitat clearance and timing, and other measures set out in the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] there would be no significant adverse effects, and there will be significant beneficial</p>	N/A	<p>ES Volume 3, Appendix 9-5: Great Crested Newt Survey Report [EN010168/APP/6.3]</p> <p>ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]</p> <p>Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19],</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		effects on ponds and amphibians as a result of the Scheme.			
WC20	Designated Sites – The assessment appears to downplay the loss of permanent pasture, and the Council has not been provided with the finalised assessment indicating areas of permanent pasture to be retained compared to those which will be lost	Section 9.10 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] sets out that permanent pasture coverage at the Solar PV Sites is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E (namely fields C23, E9, E11, E12 and E19). Overall, it concludes that there would be no significant adverse effects on the component species and sites within the Bath and Bradford on Avon Bats SAC as a result of this, and considering the embedded mitigation measures.	N/A	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.
WC21	Concerns that no additional mitigation measures beyond buffer zones are proposed to compensate for the loss of bat foraging habitat even though emerging evidence is increasingly suggested 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. Areas of permanent pasture on the Solar PV sites should be retained as far as reasonably practicable	Section 9.10 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] confirms that permanent pasture coverage at the Solar PV Sites is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E (namely fields C23, E9, E11, E12 and E19). The assessment of impacts on foraging/commuting bats presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] . This assessment and the proposed mitigation measures have taken into account emerging research papers indicating reduced activity over solar farm sites for certain bat species, whilst recognising the well-documented constraints of this research in being able to draw detailed conclusions. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] concludes that there	N/A	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3]	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		would be no significant adverse effects on foraging and commuting bats, and due to the increased foraging opportunities due to enhanced and newly created habitat, there would be a significant beneficial effect.			
WC22	Construction Phase Impacts – Further information needed on how security lighting during the construction phase will impact roosting bats	<p>As noted in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.3] during construction, temporary site lighting will be required to enable safe working during hours of darkness (likely over the winter months only) and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Solar PV Sites and Cable Route Corridor, particularly towards valuable ecological habitats. Standard good practice measures, as set out in the Outline CEMP [EN010168/APP/7.12] would be employed to minimise light spill, including glare, during construction. A sensitive lighting strategy, as set out in the Outline Construction Environmental Management Plan [EN010168/APP/7.13] which will be secured by Requirement 13 of the Draft DCO [EN010168/APP/3.1], and the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] will specify where and how any artificial lighting will be used, which will serve to mitigate adverse impacts on ecological receptors such as bats.</p> <p>ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] concludes that although artificial lighting may be required during winter, bats are typically in hibernation during the winter months, and only active occasionally for short periods. Embedded mitigation measures including buffer zones around trees and buildings identified as being suitable for roosting bats, which are proportionately sized to the suitability of the</p>	N/A	<p>ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.3]</p> <p>ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]</p> <p>Outline OEMP [EN010168/APP/7.13]</p> <p>Outline CEMP [EN010168/APP/7.12]</p> <p>Draft DCO [EN010168/APP/3.1]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		tree, will reduce the likelihood of any light spill impacting any roosts present within trees. Further limitations on the use of lighting during the construction phase as part of the sensitive lighting strategy to minimise potential impacts on roosting bats are provided in the Outline CEMP [EN010168/APP/7.14] and Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] . No significant effects on roosting bats are anticipated as a result of construction of the Scheme.			
WC23	Potential impacts on habitat used by qualifying species of the Bath and Bradford on Avon Bates SAC and the need for an Habitat Regulations Assessment	A full assessment of the Bath and Bradford on Avon Bats SAC is set out in the Habitats Regulations Assessment Report [EN010168/APP/7.10] which confirms that no significant adverse effects on the site integrity of the relevant European sites (including the Bath and Bradford on Avon SAC) are deemed likely, either in isolation or in combination with other projects.		Habitats Regulations Assessment Report [EN010168/APP/7.10]	Likely to be resolved before the close of examination stage.
WC24	Operation Phase Impacts – The assessment should fully consider the impact of permanent pasture loss on bat foraging and that a precautionary approach must be taken when considering impacts on bat activity over fields containing solar panels. Sufficient evidence and further information is needed to augment the applicant's conclusion of no significant adverse effect on foraging / commuting bats during the operational phase	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] fully considers the impact of permanent pasture loss on bat foraging and further detail of the methodology used is set out in section 9.6. Section 9.10 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] sets out that permanent pasture coverage at the Solar PV Sites is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E (namely fields C23, E9, E11, E12 and E19). Overall, it concludes that with the embedded mitigation measures set out in ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and the Outline Ecological Protection and Mitigation Strategy	N/A	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		[EN010168/APP/7.19], there would be no significant adverse effects on foraging bats as a result of this.			
WC25	Sufficiency of mitigation strategy for ground nesting birds	The mitigation measures proposed for ground nesting birds are set out in section 9.8 and 9.12 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] and within the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] . An assessment of potential effects on ground nesting birds is set out in section 9.10 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , and section 9.13 concludes that there will be significant residual effects on Breeding Birds – Ground Nesting Birds of Open Habitats following the implementation of mitigation.	N/A	Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1],	Likely to be resolved before the close of examination stage.
WC26	Council cannot fully assess the impact on trees due to insufficient detail in the submitted Arboricultural Report and Tree Constraints Plans. All arboricultural features should be considered in the ES, as the cable route and its impact on trees remain undefined.	Arboricultural features that have the potential to be impacted by the Scheme are all assessed within ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] . The methodology used as part of the assessment is set out in section 10.6 of the chapter, and the residual effects and conclusions are set out in section 10.12. Table 10-14 of ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] sets out a summary of significant residual effects during construction and lists the trees that will experience significant effects along the Cable Route Corridor.	N/A	ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]	Likely to be resolved before the close of examination stage.
WC27	Clarity needed on whether modifications to the National Grid Melksham Substation require planning permission, and whether noise from enabling works will be controlled – the council requires a BS4142 noise assessment for these works	The Grid Connection Statement [EN010168/APP/7.5] sets out that the Applicant and its appointed contractors and consultants will be responsible for the design and construction of the installation of bay equipment at the Existing National Grid Melksham Substation, set out as Work No. 4 in Schedule 1 of the Draft	N/A	Draft DCO [EN010168/APP/3.1] Grid Connection Statement [EN010168/APP/7.5]	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
		<p>DCO [EN010168/APP/3.1]. Separate planning permission is not required.</p> <p>ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] provides an assessment of effects relating to noise and vibration as a result of the Scheme which includes works at the Existing National Grid Melksham Substation and concludes that there would be no significant effects.</p>		<p>ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]</p>	
WC28	Insufficient information has been provided to the Council for it to consider the likely potential effects of this scheme and ensure that sufficient mitigation is included within the DCO application submission to minimise any adverse impacts on Wiltshire and its communities	Wiltshire Council will be able to review and provide further comments on all DCO documents that are submitted should be DCO application be accepted for Examination by the Planning Inspectorate.	N/A	<p>Environmental Statement [EN010168/APP/6.1], Figures [EN010168/APP/6.2] and Appendices [EN010168/APP/6.3]</p>	Likely to be resolved before the close of examination stage.
WC29	Due to the applicant's refusal to undertake a supplementary public consultation on this scheme, it has not been possible to consider the cable connection route surveys and further assessment information to ascertain whether the full environmental effects of the scheme have been robustly identified.	<p>The Applicant considers that the Statutory Consultation carried out in January to March 2025 was undertaken in accordance with the requirements of the Planning Act 2008, The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. On this basis, a second Statutory Consultation was not undertaken.</p> <p>While no second formal Statutory Consultation has taken place. The Applicant notes that there will be further opportunities for Wiltshire Council to provide representations on the Scheme including comments on all final surveys relating to the Cable Route Corridor and any further assessment information submitted as part of the DCO application, should the DCO application be accepted for Examination by the Planning Inspectorate.</p>	N/A	<p>Environmental Statement [EN010168/APP/6.1], Figures [EN010168/APP/6.2] and Appendices [EN010168/APP/6.3]</p>	Unlikely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
WC30	For the proposed Change 7 within the Targeted Consultation change 7, it may encroach into an area of ancient broadleaved woodland and priority habitat / HPI that is known as North Bincombe Wood and is also designated as a CWS named Rodbourne Plantation. As such, works in this CWS / ancient woodland would be contrary to Core Policy 50 of the Wiltshire Core Strategy and National Planning Policy Framework (NPPF) and it is recommended that this proposed revision is not taken forward and that an alternative is identified.	<p>As set out in ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EN010168/APP/6.3], a 242 m section of internal access track is proposed within the 15 m wide Ancient Woodland Buffer Zone of North Bincombe Wood in Site E. The affected area in the buffer zone comprises an existing gravelled track along the northern extent of the woodland as well as arable farmland that has historically been subject to regular heavy farm machinery movements and ground compaction. No tree removal is anticipated to be required, and the existing subbase should be preferably retained. Should however hand excavation and pre-emptive root pruning be required to establish a subbase for the proposed access track, this may lead to minor losses of fibrous roots to several trees on the edges of the woodlands. Several trees on the edge of the woodland may also require minor crown lifting/pruning to create sufficient clearance for construction vehicles to move along the proposed access track. As only a very small number of trees on the edges of the woodlands will be potentially impacted, and these trees are confirmed to not be veteran trees, low impacts to affected trees are anticipated at most. Negligible impacts to North Bincombe Wood are anticipated as a result of the access track installation.</p> <p>Relevant policies from the NPPF are considered in Annex A: National Policy Accordance Tables of the Planning Statement [EN010168/APP/7.2]. Core Policy 50 is considered in Annex B: Local Policy Accordance Tables of the Planning Statement [EN010168/APP/7.2].</p>	N/A	<p>ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment [EN010168/APP/6.3]</p> <p>Annex A: National Policy Accordance Tables of the Planning Statement [EN010168/APP/7.2]</p> <p>Annex B: Local Policy Accordance Tables of the Planning Statement [EN010168/APP/7.2]</p>	Likely to be resolved before the close of examination stage.

Reference	Description of Issue	Applicant's position	Wiltshire Council response to the PMIE letter	Signposting to Application Evidence	RAG rating
WC31	Table 3.1 of the Scoping Note relating to the CTMP / TS shows the projected number of HGV movements associated with the construction of the Lime Down A-E areas. However, there is no supporting information advising how the figures are arrived at. Furthermore, the HGV movements required for the cable connection route have not been identified. The council requires the supporting information on material / component quantum for verification that the movements identified in the ES have been suitably calculated and the resultant impacts assessed and mitigated.	<p>A detailed breakdown of construction trip generation calculations and programme is included in ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]. Information is provided for Lime Down A-E areas and the Cable Route Corridor.</p> <p>HGV movements were discussed in a meeting with Wiltshire Council on 28 August 2025.</p>	N/A	ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]	Likely to be resolved before the close of examination stage.

2.12 References

- Ref 1 HM Government (2008). Planning Act 2008. Available at:
<https://www.legislation.gov.uk/ukpga/2008/29/contents> [Accessed 20 August 2025]
- Ref 2 Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus. Available at:
<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus> [Accessed 20 August 2025]

Annex A Copies of PMIE letters

**Annex B Copies of statutory bodies and local authority
responses to PMIE letters**

Appendix A - Potential Main Issues for Examination with the Cotswolds National Landscape Board

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Applicant Response
1	The Board considers that the proposal for the Scheme as consulted upon has the potential to give rise to significant adverse environmental effects upon the Cotswolds National Landscape (CNL) designation and its setting. It would also fail to further the purpose of the CNL designation in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000.		<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] will explain that although Solar PV Panels have been removed from the Scheme on the edge of the CNL, from Lime Down A and Lime Down C located directly adjacent to the east of the CNL near Luckington and Sherston, there will be some intervisibility of the Scheme from the CNL until mitigation planting matures to screen views. There will be a degree of visibility of the Scheme within the setting of the CNL.</p> <p>The Planning Statement [EN010168/APP/7.2] will set out details of the s.85 Countryside and Rights of Way Act 2000 and the duty to seek to further the purpose of the CNL.</p>
2	The Board considers that Solar PV Panels should be removed from several fields that form part of the Solar PV Sites, in particular Fields 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.		<p>The Design Approach Document [EN010168/APP/7.3] will explain that Solar PV Panels within Fields A11, A12, C2, C3 and C4 have been removed to avoid significant adverse landscape and visual effects on the CNL and its setting. Field A11 and A12 on the boundary of the CNL will provide habitat enhancement to further the purpose of the CNL designation, as informed by the CNL Management Plan and the Cotswolds National Landscape (AONB) Landscape Strategy</p>

			and Guidelines'. However, Fields C2, C3 and C4 have been removed from the Order Limits of the Scheme and will not be used for habitat enhancement.
3	Pending the results of further assessment, 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.		<p>The Design Approach Document [EN010168/APP/7.3] will explain that Solar PV Panels in the remainder of Field C6 have been removed from the Scheme and will be retained for habitat mitigation and enhancement.</p> <p>As part of the assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] the visibility of Solar PV Panels in Field C7 has been tested through the production of a series of sections to inform both the CNL Board Technical Officer and the Wiltshire Council Landscape Officer on the potential visibility of Solar PV Panels from agreed locations (coordinated with the locations of the previously agreed Viewpoints and one additional) within the CNL. Visualisations from these viewpoints will be submitted alongside ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and have been used to inform the assessment.</p> <p>Field C9 remains unchanged from the design shown at statutory consultation, and the remainder of it will still include Solar PV Panels.</p>

4	<p>Construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty.</p>		<p>The most appropriate routes to the Site in terms of highway geometry and road classification do utilise some roads within the CNL, including A-Roads and B-Roads, which accommodate existing HGV movements. Less appropriate roads, in terms of highway geometry and suitability for HGV traffic would have to be utilised if all movement was to avoid the CNL. ES Volume 3: Appendix 8-6 LVIA Assessment of the Special Qualities of Cotswold National Landscape [EN010168/APP/6.3] will provide an assessment of impacts of the use of these routes on the CNL.</p>
5	<p>"Receptor: TR039The Avenue, Alderton</p> <p>CNLB comments: Short section of road running to the east of Alderton on the edge of the Cotswold National Landscape. At the northern end of the section, the road connects to Church Street at PVP26.</p> <p>Although panels have been removed from C1 and the western part of C6, the AVR1 visualisation at Figure 8-14-26 shows likely visibility of the panels in field C2 in views from viewpoint 26. This would be avoided with the removal from panels from C2 as recommended above to avoid significant adverse impacts from other viewpoints.</p> <p>CNLB Recommendations: Remove all panels from C2 on the northern side of the ridge running through the field or in areas</p>		<p>The Design Approach Document [EN010168/APP/7.3] will explain that Field C2, C3 and C4 have been removed from the Scheme, and will therefore will not be used for habitat enhancement.</p>

	where skyline effects would be apparent and identify these fields for habitat enhancement."		
6	<p>"Receptor: TR038 Alderton Road, Luckington</p> <p>CNLB comments: Rural road between Alderton and the Fosse Way which forms the boundary of the Cotswold National Landscape. PVP 25 is located at the eastern end at the junction with the Fosse Way.</p> <p>We agree that there would be a significant adverse effect at construction and year 1.</p> <p>We support the exclusion of all of, or parts of, fields C6, C8, C9 and C10 for habitat enhancement. We wish to reserve judgment as to the potential impact of the panels located within the southern part of field remainder of C6 and C7 and C9 until further assessment has been carried out using wintertime photography.</p> <p>CNLB Recommendations: Possible removal of panels from the remainder of C6 and from C7 and C9 pending the results of further assessment."</p>		<p>The landscape and visual effects of the Scheme on Receptor: TR038 Alderton Road will be assessed within ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] under viewpoint reference number VP CNL G.</p> <p>The Design Approach Document [EN010168/APP/7.3] will explain that Solar PV Panels in the remainder of Field C6 have been removed from the Scheme and will be retained for habitat mitigation and enhancement.</p> <p>As part of the assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] the visibility of Solar PV Panels in Field C7 has been tested through the production of a series of sections to inform both the CNL Board Technical Officer and the Wiltshire Council Landscape Officer on the potential visibility of Solar PV Panels from agreed locations (coordinated with the locations of the previously agreed Viewpoints and one additional) within the CNL. Visualisations from these viewpoints will be submitted alongside ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and have been used to inform the assessment.</p>

			<p>Field C9 remains unchanged, and the remainder of it will still include Solar PV Panels.</p> <p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and its related appendices and figures will include viewpoint photography for both Summer and Winter for all viewpoints.</p>
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8 August 2025

Reference: EN010168

Lewis Pemberton – Environment Agency

Email: [REDACTED]

[REDACTED]
Address: Environment Agency,
PO Box 544,
Rotherham,
Yorkshire,
S60 1BY

Dear Lewis Pemberton,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).




In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have initially identified potential issues raised by the Environment Agency through a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with the Environment Agency. The issues we have identified are set out in the table in **Appendix A** of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Alongside the issue and RAG rating, the Applicant has set out its response to explain why the issue raised will be a PMIE, and to give you the opportunity to provide a further response if you wish to. The Applicant's response column will not be included in the final PMIE document.

To help us prepare the PMIE document, could you please let us know if you agree the status of the potential issues for the Scheme in relation to the Environment Agency set out in the table at **Appendix A**. If there are further issues you would like to identify prior to examination, please add further rows to the table at **Appendix A**.

Please return a completed copy of this table to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with the Environment Agency which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will inform the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park Limited

Appendix A - Potential Main Issues for Examination with Environment Agency

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Applicant Response
1	Requirement for the scope of the pre-ES intrusive ground investigation to include a 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 (19.10.2, appendices 19-1 to 19-17)		<p>ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] will provide an assessment of the likely significant effects of the Scheme on ground conditions and contamination, with section 19.7 and 19.8 providing the baseline conditions of the Solar PV Sites and Cable Route Corridor, section 19.10 and 19.12 providing embedded and additional mitigation measures, and section 19.11 setting out the assessment of likely impacts and effects.</p> <p>As will be set out in ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1], intrusive ground investigation will be undertaken prior to commencement of construction in areas impacted by identified geohazards and in locations where permanent structures, i.e. substations and BESS Area, are to be deployed. The requirements for pre-construction intrusive ground investigation will be set out in the Outline Construction Environmental Management Plan (CEMP) [EN010168/APP/7.12] which will be secured by Schedule 2 of the DCO.</p>

8 August 2025

Reference: EN010168

**Melanie Barge and Simon Hickman –
Historic England**

Email: [REDACTED]
[REDACTED]

Address: Historic England,
Fermentation North (1st floor),
Finzells Reach,
Hawkins Lane,
Bristol,
BS1 6WQ

Dear Melanie Barge and Simon Hickman,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.




Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have initially identified potential issues raised by Historic England through a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with Historic England. The issues we

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

have identified are set out in the table in **Appendix A** of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Alongside the issue and RAG rating, the Applicant has set out its response to explain why the issue raised will be a PMIE, and to give you the opportunity to provide a further response if you wish to. The Applicant's response column will not be included in the final PMIE document.

To help us prepare the PMIE document, could you please let us know if you agree the status of the potential issues for the Scheme in relation to Historic England set out in the table at Appendix A. If there are further issues you would like to identify prior to examination, please add further rows to the table at **Appendix A**.

Please return a completed copy of this table to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with Historic England which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will inform the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

A large black rectangular box redacting the signature of Will Threlfall.

Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with Historic England

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Applicant Response
1	Historic England does not recommend Horizontal Directional Drilling (HDD) under archaeological remains- 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.		<p>An overarching archaeological mitigation strategy will be provided in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy (AMS) [EN010168/APP/6.3], which will be secured by a Requirement in Schedule 2 of the DCO. It is anticipated that Written Schemes of Investigation (WSIs) (or project designs) will be appended to the AMS which will detail individual phases of works.</p> <p>Details of how mitigation has been embedded into the Scheme to avoid and reduce impacts as far as practicable will be set out in section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]. Embedded mitigation will include the use of HDD within one area in the Cable Route Corridor (Field F120-01 as will be shown on ES Volume 2, Figure 12-2 Archaeological Assets [EN010168/APP/6.2]) at a suitable depth to avoid impacts to buried archaeological remains. For the remaining areas, Strip, Map and Sample will be used to mitigate impacts.</p>
2	Concerns raised about the potential impact of the scheme on the setting of Bradfield Manor Farm Grade I LB.		<p>ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and ES Volume 3, Appendix 12-1 Heritage Statement [1/APP/6.3] will explain that since the design presented at the statutory</p>

			<p>consultation, Solar PV Panels have been removed entirely from the southernmost part of Field D5, the Field nearest Bradfield Manor Farm. Solar PV Panels will be present throughout the remainder of Lime Down D to the north-west, north and north-east, though there have been offsets established along the number of Public Rights of Way (PRoW) within the area (HULL1, HULL 4, HULL 5, HULL 6), as well as along Bradfield Cottages in the east, as well as the establishment of a wildflower meadow within the western part of Field D6, adjacent this road. The BESS Area and a 400 kV Substation will be situated within Fields D1 and D22, approximately 790m and approximately 950m to the west and west-north-west respectively.</p> <p>Throughout Lime Down D, screening has been proposed, including the enhancement of existing hedgerows throughout. Along the southern and south-eastern boundaries of Fields D1-D3, a new woodland belt will be established. Within the southernmost part of Field D5, a new native woodland block will also be created, which recreates a former woodland block which was once present within this area, as illustrated on the 1841 Hullavington Tithe Plan.</p> <p>ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and ES Volume 3, Appendix 12-1 Heritage Statement [1/APP/6.3] will also set out that from ground level, the proposed mitigation will provide further screening, in addition to the existing</p>
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			<p>coverage provided by trees within and adjacent the property, between Bradfield Manor Farmhouse and Lime Down D. However, views from the 3-storey parlour block appear to have been designed to provide views of the surrounding agrarian landscape, and the placement of Solar PV Panels within areas further north and north-east of Lime Down D are likely to be partially visible from this part of the farmhouse, due to the gentle rising in the landscape within these directions and, as a result, changing the wider agricultural setting of this asset. However, this intervisibility is expected to be reduced upon the implementation of the proposed mitigation, largely due to the proposed new woodland belts and blocks within Lime Down D, as well as the enhancement of existing hedgerows across the Scheme.</p> <p>Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening of views to and from Bradfield Manor Farmhouse, which will be set out in ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] and ES Volume 3, Appendix 12-1 Heritage Statement [1/APP/6.3].</p>
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			It is therefore considered that there will be less than substantial harm to the significance and setting of Bradfield Manor Farmhouse. Due to the mitigation implemented within the project design, this is assessed at the lower end of the scale.
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8 August 2025

Reference: EN010168

**Tiffany Bate – National Grid Electricity
Transmission**

Email: [REDACTED]

Address: National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Dear Tiffany Bate,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.




For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have not identified any potential issues raised by National Grid Electricity Transmission following a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with National Grid Electricity Transmission in relation to the Scheme, that may be potential issues for examination.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

To help us prepare the PMIE document, could you please let us know if you agree that you have no potential issues for examination in relation to the Scheme, or whether you wish to raise anything further. If there are issues you would like to identify prior to examination, please add rows to the table at **Appendix A**.

If adding issues to the table at **Appendix A**, please can you categorise issues with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

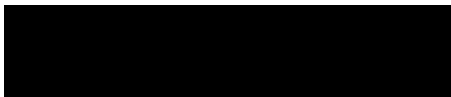
	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Please respond to this letter either by confirming you have no issues with the Scheme, or if you wish to raise any issues, by returning a completed copy of the table in **Appendix A** to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with National Grid Electricity Transmission which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will influence the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with National Grid Electricity Transmission

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG

8 August 2025

Reference: EN010168

Gaynor Gallagher – National Highways

Email:

[REDACTED]

Address: National Highways,
Ash House,
Falcon Road,
Sowton Ind. Estate,
Exeter,
EX2 7LB

Dear Gaynor Gallagher,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.




For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have not identified any potential issues raised by National Highways following a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with National Highways in relation to the Scheme, that may be potential issues for examination.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

To help us prepare the PMIE document, could you please let us know if you agree that you have no potential issues for examination in relation to the Scheme, or whether you wish to raise anything further. If there are issues you would like to identify prior to examination, please add rows to the table at **Appendix A**.

If adding issues to the table at **Appendix A**, please can you categorise issues with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

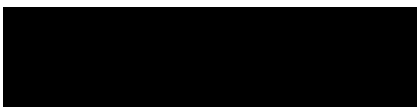
	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Please respond to this letter either by confirming you have no issues with the Scheme, or if you wish to raise any issues, by returning a completed copy of the table in **Appendix A** to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with National Highways which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will influence the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with National Highways

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG

8 August 2025

Reference: EN010168

Amelia Earley – Natural England

Email: [REDACTED]

Address: Natural England,
Foss House,
Kings Pool, 1-2,
Peasholme Green,
York,
YO1 7PX

Dear Amelia Earley,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).




In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have initially identified potential issues raised by Natural England through a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with Natural England. The issues we have identified are set out in the table in **Appendix A** of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Alongside the issue and RAG rating, the Applicant has set out its response to explain why the issue raised will be a PMIE, and to give you the opportunity to provide a further response if you wish to. The Applicant's response column will not be included in the final PMIE document.

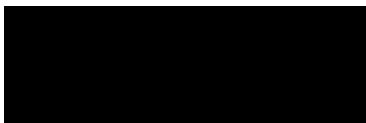
To help us prepare the PMIE document, could you please let us know if you agree the status of the potential issues for the Scheme in relation to Natural England set out in the table at **Appendix A**. If there are further issues you would like to identify prior to examination, please add further rows to the table at **Appendix A**.

Please return a completed copy of this table to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with Natural England which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will inform the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with Natural England

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Applicant Response
1	Concern that areas of Lime Down C are visible from the Cotswolds National Landscape (CNL) and footpaths extending from the National Landscape to the wider countryside. The topography makes it a more sensitive part of the site with panels in this area more likely to have adverse landscape and visual effects.		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] will provide an assessment of the Scheme's likely landscape and visual impacts on the CNL and the surrounding area, and details the mitigation proposed to avoid or reduce impacts as far as practicable.
2	Recommended that the extent of panels within Lime Down C is reviewed to avoid adverse landscape and visual effects on the CNL. Where panel areas are reduced, this should be used to provide landscape and ecological enhancements, particularly for lesser horseshoe bats.		<p>The Design Approach Document [EN010168/APP/7.3] will explain that the Scheme design is the result of an iterative process that has evolved in response to stakeholder engagement, consultation feedback, and technical studies, a design vision and design principles which have guided the design to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application. A key design principle for the Scheme has been to make sure the design of the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding countryside.</p> <p>The Design Approach Document [EN010168/APP/7.3] will explain that Solar PV Panels in Field C1, part of Field C6, Field C8, part of Field C9, and most of Field C10 have been removed since statutory consultation, along the southern and western edges of Lime Down C to minimise effects on the setting of the CNL, and these fields will instead be used for mitigation and enhancement planting.</p>

			<p>However, field parcels C2, C4 and C3 which contained Solar PV Panels at statutory consultation have been removed from the Order Limits to minimise effects on the CNL and its setting and will therefore will not be used for habitat enhancement.</p>
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8 August 2025

Reference: EN010168

Andrew Haines – Network Rail

Email: [REDACTED]

Address: Network Rail,
Waterloo General Office,
London,
SE1 8SW

Dear Mr Andrew Haines,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have not identified any potential issues raised by Network Rail following a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with Network Rail in relation to the Scheme, that may be potential issues for examination.




To help us prepare the PMIE document, could you please let us know if you agree that you have no potential issues for examination in relation to the Scheme, or whether you

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

wish to raise anything further. If there are issues you would like to identify prior to examination, please add rows to the table at **Appendix A**.

If adding issues to the table at **Appendix A**, please can you categorise issues with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Please respond to this letter either by confirming you have no issues with the Scheme, or if you wish to raise any issues, by returning a completed copy of the table in **Appendix A** to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with Network Rail which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will influence the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with Network Rail

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG

14 August 2025

Reference: EN010168

Mr Brian Glasson - South Gloucestershire Council

Email: [REDACTED]

Address: Planning Service Director,
Department for Place,
PO Box 1954,
Bristol,
BS37 0DD

Dear Mr Brian Glasson,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.




For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have not identified any potential issues raised by South Gloucestershire Council following a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with South Gloucestershire Council in relation to the Scheme, that may be potential issues for examination.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

To help us prepare the PMIE document, could you please let us know if you agree that you have no potential issues for examination in relation to the Scheme, or whether you wish to raise anything further. If there are issues you would like to identify prior to examination, please add rows to the table at **Appendix A**.

If adding issues to the table at **Appendix A**, please can you categorise issues with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Please respond to this letter either by confirming you have no issues with the Scheme, or if you wish to raise any issues, by returning a completed copy of the table in **Appendix A** to us by the 22 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with South Gloucestershire Council which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will influence the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with South Gloucestershire Council

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG

8 August 2025

Reference: EN010168

Company Secretary/Clerk – Wessex Water

Email: planning.liaison@wessexwater.co.uk

Address: Wessex Water

Developers Group, Operations Centre,

Claverton Down Road,

Claverton Down,

Bath,

BA2 7WW

Dear Sir/Madam,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.




For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have not identified any potential issues raised by Wessex Water following a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with Wessex Water in relation to the Scheme, that may be potential issues for examination.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

To help us prepare the PMIE document, could you please let us know if you agree that you have no potential issues for examination in relation to the Scheme, or whether you wish to raise anything further. If there are issues you would like to identify prior to examination, please add rows to the table at **Appendix A**.

If adding issues to the table at **Appendix A**, please can you categorise issues with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Please respond to this letter either by confirming you have no issues with the Scheme, or if you wish to raise any issues, by returning a completed copy of the table in **Appendix A** to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with Wessex Water which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will influence the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with Wessex Water

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG

8 August 2025

Reference: EN010168

Karen Jones – Wiltshire Council

Email: LDSPProjectTeam@wiltshire.gov.uk

Address: Development Management

County Hall

Bythesea Road

Trowbridge

Wiltshire

BA14 8JN

Dear Karen Jones,

**Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168**

Lime Down Solar Park Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (PA 2008) for a Development Consent Order (DCO) for Lime Down Solar Park (the Scheme). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹ (the 2024 Pre-application Prospectus).

In accordance with the 2024 Pre-application Prospectus, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document which will be submitted as part of the DCO application. The function of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The 2024 Pre-application Prospectus states that the PMIE document should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. The PMIE document will influence the content of the Initial Assessment of Principal Issues (IAP) which is prepared by the appointed Examining Authority.

Further information about the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

For the purpose of the PMIE document, potential issues include matters relating to the Scheme that are not fully agreed with statutory bodies or local authorities. We have initially identified potential issues raised by Wiltshire Council through a review of responses to the Applicant's non statutory and statutory consultation, targeted consultation, and meetings and correspondence with Wiltshire Council. The issues we have identified are set out in the table in **Appendix A** of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

Alongside the issue and RAG rating, the Applicant has set out its response to explain why the issue raised will be a PMIE, and to give you the opportunity to provide a further response if you wish to. The Applicant's response column will not be included in the final PMIE document.

To help us prepare the PMIE document, could you please let us know if you agree the status of the potential issues for the Scheme in relation to Wiltshire Council set out in the table at **Appendix A**. If there are further issues you would like to identify prior to examination, please add further rows to the table at **Appendix A**.

Please return a completed copy of this table to us by the 20 August 2025 via email at the following address: info@limedownsolar.co.uk

In addition to the above, the Applicant is hoping to enter into a Statement of Common Ground with Wiltshire Council which the Applicant will start to prepare during the pre-examination period, should the DCO Application be accepted for examination by the Planning Inspectorate. The Statement of Common Ground will set out where agreement has been reached between the parties, and where agreement has not yet been reached. The PMIE document will inform the Statement of Common Ground.

Responses to this letter and the table at **Appendix A** will be published in the PMIE document that we submit with the DCO Application. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully



Will Threlfall
Senior Project Development Manager
On behalf of Lime Down Solar Park
Limited

Appendix A - Potential Main Issues for Examination with Wiltshire Council

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Applicant Response
1	Additional justification and explanation needed to explain how the Zone of Influence (Zol) for cumulative landscape and visual effects was established within the LVIA methodology.		<p>ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] will provide further clarity on the methodology used in the assessment.</p> <p>A Technical Note to clarify the approach to the Cumulative Assessment has been issued to Wiltshire Council. This takes account of comments received from Wiltshire Council and confirms that the Study Area for the Cumulative Assessment has been extended to 10km. This is named the 10km Cumulative Study Area.</p> <p>The Applicant will continue to engage with Wiltshire Council prior to submission to discuss and confirm the methodology for the landscape and visual cumulative assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].</p>
2	Disagree with the decision to not include existing operational solar schemes (identified by the council) on short lists as all large-scale solar development within the cumulative Zol should be scoped into the cumulative landscape assessment.		<p>All existing and committed development will be considered as part of the baseline in the landscape and visual cumulative assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. This is particularly relevant to the 10km Cumulative Study Area where existing and committed development have not been previously considered as the baseline assessment of the Lime Down Scheme extends to 5km.</p>

			<p>The Applicant will continue to engage with Wiltshire Council prior to DCO submission to discuss and confirm the approach to existing and committed developments in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].</p>
3	<p>Concern that the location of developments selected for further assessment are only indicated with a pin marker. Would rather the spatial extents of development areas are included in Figure 21-1 to understand the spatial relationship with the Lime Down areas A to E.</p>		<p>The Applicant will prepare a figure to show the planning application boundary for all Solar, BESS, and Substation developments within the 10km Cumulative Study Area considered for the cumulative assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. All other types of development will remain marked with pins.</p>
4	<p>Further work needed to confirm 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</p>		<p>Shared intervisibility between all the Solar PV Sites will be considered in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].</p> <p>Representative Viewpoints have been agreed with Wiltshire Council and three additional Viewpoints are included in the landscape and visual assessment carried out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].</p> <p>The Applicant will continue to engage with Wiltshire Council prior to DCO submission to discuss and confirm the approach to consider intervisibility between all the Solar PV Sites in the landscape and visual assessment in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].</p>

5	Should consider 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	<p>Existing operational solar developments will be considered as part of the baseline for the assessment. Shared intervisibility between the Scheme and other developments will be considered in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].</p> <p>The additional Viewpoint WC 3 which has been added to the assessment in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] represents the shared intervisibility between Rodbourne Rail Farm and Lime Down A from Footpath WT MALW 53 and is assessed.</p> <p>Cumulative landscape effects in relation to landscape character will be appropriately assessed in line with relevant policy and guidance in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1].</p> <p>The Applicant will continue to engage with Wiltshire Council prior to DCO submission to discuss and confirm the approach to consider intervisibility between the Scheme and other developments in the landscape and visual assessment in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].</p>
6	Concern that 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 being appropriately considered	<p>The cumulative assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] assesses all Landscape Types and Landscape Character Areas (including the 'Limestone Lowland Type' and its associated 'Landscape Character Areas') which are located within the 10km Cumulative Study Area.</p>

7	Request that 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 Zol	<p>A figure has been prepared to show the planning application boundary for all Solar, BESS, and Substation developments within the 10km Cumulative Study Area that have been considered as part of the cumulative assessment (ES Volume 2, Figure:8-15-5: Included Cumulative Developments [EN010168/APP/6.2]).</p> <p>Operational developments have not been considered in this figure as these would form part of the existing baseline (set out in ES Volume 2, Figure 8-15-1: Baseline Existing Solar Schemes [EN010168/APP/6.2]).</p>
8	Concerns that the CRC was not refined in the PEIR and that there has 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 such, the ecological baseline of the CRSC hasn't been established	<p>The refinement of the Cable Route Corridor will be set out in the Design Approach Document [EN010168/APP/7.3] and ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] which will be submitted with the DCO application. These documents set out that the Cable Route Corridor was refined in the lead up to statutory consultation based on a comparative analysis such as the length of the route, the number of road, rail watercourse crossings, field boundaries and the agricultural grade of the land. Design principles relating to the adherence to the mitigation hierarchy (Design Principle 2), minimising impacts on amenity Design Principle 5), protecting the water environment (Design Principle 6), and minimising impacts to PRow (Design Principle 9) provided a framework for design decision making in relation to refinement of the cable route corridor. The analysis undertaken to refine the Cable Route Corridor up to statutory consultation identified a preferred route which avoided the greatest number of constraints, was shorter and has a shorter number of constraint crossings (such as railway/road/PRow crossings). In addition, to minimise potential environmental effects, facilitate construction, and enable construction access, the Cable Route Corridor was expanded at five locations to provide further flexibility in</p>

			<p>locating the Cable Route Corridor. Following statutory consultation, the Cable Route Corridor has been further refined and a project update in June 2025 provided further information on the route of the refined Cable Route Corridor. The alignment of the Cable Route Corridor was refined further with consideration of the design principles, and potential impacts on factors such as PRoW, residential receptors, ponds, watercourses and vegetation, trees and hedgerows, flood risk and drainage, heritage assets, access, soil disturbance and ground contamination.</p> <p>Survey results for the Cable Route Corridor are expected to be shared with Wiltshire Council in August and the Applicant will continue to engage with Wiltshire Council on this. Survey results will be provided within ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-6: Otter and Water Vole Survey Report [EN010168/APP/6.2], and have been used to underpin the assessment within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]</p>
9	Lack of surveys for the additional areas at Lime Down C and D and for the CRSC means that 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.		<p>Survey results for these areas were not available at PEIR stage as surveys were ongoing. Completed survey results including additional land at Lime Down C and D are to be provided to Wiltshire Council prior to DCO submission. Cable Route Corridor results are also expected to be provided in August. Survey results will be provided within ES Volume 3, Appendices 9-1: Ecological Baseline Report to 9-6: Otter and Water Vole Survey Report [EN010168/APP/6.3], and have been used to underpin the assessment within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]</p>
10	Concerns that no additional mitigation measures beyond buffer zones are proposed to compensate for the loss of bat foraging		<p>The Scheme design has evolved since the PEIR stage and permanent pasture has been retained as far as practicable. Permanent pasture coverage at the Solar PV Sites anticipated to be</p>

	habitat even though merging 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. Therefore recommended that the areas of permanent pasture on the Solar PV Sites should be retained as far as reasonably practicable		lost is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E which is stated within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , with considerably less permanent pasture now expected to be lost than indicated at PEIR stage. The assessment of impacts on foraging/commuting bats which will be presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] , and has taken into account emerging research indicating reduced activity over solar farm sites for certain species. The Applicant will continue to discuss this matter with Wiltshire Council.
11	Concerns that the assessment of BBOA Bats SAC does not consider the potential presence of Bechstein's bat roosts in the CRSC area despite a Technical Briefing Note being provided on this.		The assessment of impacts on the Bath and Bradford on Avon Bats SAC bats which will be presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] takes into consideration the potential presence of Bechstein's bat roosts. The refinement of the Cable Route Corridor has been taken into account the location of the Bechstein's bat roosts and the 1.5 km 'Core Area' around them as presented in the Technical Briefing Note. The Applicant will continue to discuss this matter with Wiltshire Council.
12	Operation Phase Impacts - The assessment does not fully consider the impact of permanent pasture loss on bat foraging and the fact that a precautionary approach must be taken when considering impacts on bat activity over fields containing solar panels.		The Scheme design has evolved since the PEIR stage and permanent pasture has been retained as far as practicable. Permanent pasture coverage at the Solar PV Sites anticipated to be lost is comparably small, accounting for approximately 16.2 ha or 2.2 % of the total area of land covered by the Solar PV Sites, split between Lime Down C and E. The clarification on loss of permanent pasture will be provided within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , with a considerably reduced

			quantum of less permanent pasture now expected to be lost than indicated at PEIR stage. The assessment of impacts on foraging/commuting bats will be presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , and is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] , and has taken into account emerging research indicating reduced activity over solar farm sites for certain species The Applicant will continue to discuss this matter with Wiltshire Council.
13	Further information and evidence needed to augment the conclusion put forward in Chapter 9 of no significant adverse effect on foraging / commuting bats during the operational phase.		The assessment of impacts on foraging/commuting bats will be presented within section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] , and is underpinned by ES Volume 3, Appendix 9-3 Bat Survey Report [EN010168/APP/6.3] , and has taken into account emerging research indicating reduced activity over solar farm sites for certain species The Applicant will continue to discuss this matter with Wiltshire Council.
14	Strongly recommends that the Council is consulted on the mitigation strategy for ground nesting birds.		The Applicant has consulted with the Council on the mitigation strategy for ground nesting birds, and notes that the Council agree in principle on the Applicants approach to ground nesting bird mitigation, discussed in a meeting on 14 July with Wiltshire Council's Ecology Officer. Plans showing mitigation areas are expected to be provided to Wiltshire Council prior to DCO submission. Embedded mitigation measures for ground nesting birds are prescribed within the Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19] and the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18] which will be secured by the DCO. The Applicant will continue to discuss this matter with Wiltshire Council.

<p>Disagrees with the assumption that concrete feet can be accepted as an adequate mitigation measure as embedded mitigation is not agreed, emphasizing that if solar panels are to be placed over areas of archaeological sensitivity then these areas must undergo either archaeological area excavations or Strip, Map, and Sample (SMS) as employed for the solar farm at Wick Farm Lacock (20/06840/FUL)</p>		<p>An overarching archaeological mitigation strategy will be provided which takes account of discussion with the Archaeology Service, and will be set out in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy (AMS) [EN010168/APP/6.3], which will be secured by a Requirement in Schedule 2 of the DCO. It is anticipated that Written Schemes of Investigations (WSIs) (or project designs) will be appended to the AMS which detail individual phases of works.</p>
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**Annex B Copies of statutory bodies and local authority
responses to PMIE letters**


RE: Lime Down Solar Park - Potential Main Issues For Examination Letter

From Simon Joyce [REDACTED]

Date Thu 8/14/2025 11:53 AM

To [REDACTED]

Cc [REDACTED]

 1 attachment (198 KB)

CNLB Standing Advice on s.85 CROW Act 2000 - seek to further duty - 2025.06.16.pdf;

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Dear Laura,

Thank you for your email and attached letter.

We can confirm that issues 1-6 in Table 2, Appendix A are still issues for resolution/agreement. We have no further comments on these items at this stage.

As the letter was sent in PDF format, I was unable to add further rows to the table in Appendix A. However, we would wish to add the following rows as 7 and 8.

7. Finalised and agreed details regarding on-site (within the project red line) habitat enhancements including LEMP/CEMP, species lists and maintenance regimes.

8. Agreed details regarding potential appropriate measures to compensate for the residual adverse effects of the development on the natural beauty of the CNL and its setting to enable the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000) to be discharged.

In our previous consultation responses, we have highlighted the Secretary of State's duty under Section 85 of the Countryside and Rights of Way Act 2000, as a 'relevant authority', to seek to further the conservation and enhancement of the CNL's natural beauty in determining this DCO application. We would recommend that, as the applicant, Island Green Power prepares its DCO application with the Secretary of State's duty in mind, to as to aid the Secretary of State in discharging the duty when determining the DCO.

DEFRA guidance for relevant authorities (referred to in our standing advice attached) states that as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. This goes beyond mitigation and like for like measures and replacement. The proposed measures to further the statutory purpose of a National Landscape should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured.

The 'seek to further' duty does not preclude decisions that are 'net harmful' to the natural beauty of a National Landscape. However, positive evidence is required to demonstrate that the relevant authority has, in all the circumstances, sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose.

DEFRA guidance also states that consideration should be given to the appropriateness of compensation measures and we note recent cases where compensation has been deemed necessary to ensure that the duty has been adequately discharged in respect of major development proposals where significant residual harm to a National Landscape will arise from the development (an example being the Lower Thames Crossing DCO decision letter, paragraphs 427-437 ([link](#))). Compensation can be either (i) direct offsetting (i.e. works on the ground) or (ii) some financial compensation.

Once a more comprehensive conclusion can be drawn on the likely scale of residual adverse impact of the proposal on the CNL and its setting (i.e. by resolving the other issues highlighting in the PMIE letter), the Board may wish to discuss the appropriateness of reasonable and proportionate compensation measures to ensure that the statutory purpose of CNL designation can be furthered through the decision-making process and the duty can be met.

[REDACTED]

Best regards,

Simon



**Cotswolds
National
Landscape**



Simon Joyce MRTPI

Planning Officer
Cotswolds National Landscape

Email: [REDACTED]

Phone: [REDACTED]

[REDACTED]

Will Threlfall
Island Green Power UK Ltd
Emailed to info@limesdownsolar.co.uk

Our ref: XA/2025/100423/01-L01
Your ref: EN010168
Date: 19 August 2025

Dear Will Threlfall

Pre Application- Potential Main Issues For Examination (PMIE)

Lime Down Solar Park, Wiltshire.

Thank you for consulting us on the draft PMIE document provided to us on 8 August 2025.

We agree that Groundwater and Contaminated land is a potential main Issue for Examination for the Environment Agency and agree with the amber risk rating. Please see annex A for further detailed comments on this issue.

However, please note this is on the basis that the issues we raised within our response to the Preliminary Environmental Information Report (ref XA/2025/100259/01 dated 19 March 2025); are incorporated into the planned further assessments.

We have had productive discussions regarding flood risk, flood modelling, fisheries, biodiversity, geomorphology and water resources. However, we are yet to review further information so cannot confirm if our comments have been adequately addressed. If not, then further discussion at Examination would be needed. Additionally, we are yet to discuss in detail the proposal to disapply the requirement for Flood Risk Activity Permits through the Development Consent Order.

We are confident that each of these matters is capable of being appropriately addressed within the duration of the Examination period.

Please see our work package tracker relating to this project, we look forward to working closely with you to address the matters remaining.

Should you have any queries regarding this response, please contact me.

creating a better place
for people and wildlife



Yours sincerely

Laura Edwards

Planning Specialist

Team email: NIteam@environment-agency.gov.uk

Appendix A: Groundwater and Contaminated Land comments on Table 2

The Conceptual Site Models in the desk study reports previously supplied should be acknowledged. We would expect an investigation of any potential sources of contamination. This differs from geohazards which are more related to geotechnical engineering than land contamination. Potential contamination sources in areas of solar panel array mounts or other works may be present and could be mobilised by the works, so it is not just the permanent structure areas we are concerned about. Piling a solar panel mount through contaminated soils could create a new contamination pathway into the underlying aquifers away from any permanent structure.

We also suggested the assessment of the depth to various subsurface bedrock strata at proposed Horizontal Directional Drilling or other deeper boring locations, as it may mean the route passes through principal aquifers and confined Source Protection Zones. If so, then we expect very strict controls, and these will need to be detailed in all relevant construction-phase management plans. It is possible that this information will be detailed and elaborated on in Chapter 19 of the Environmental Statement, but this should be made explicit.

We do not consider that the requirements for pre-construction intrusive ground investigation should be set out in the Outline Construction Environmental Management Plan (CEMP). The intrusive investigation needs to be carried out pre-construction, so requirements in the CEMP, which relates to the construction phase, may be seen and considered too late. This could lead to a reduced scope of investigation to take less time, or cause delays to the commencement of construction. We would suggest you consider the scope and design of the investigation prior to approval so that the intrusive works can commence quickly after approval is granted, to cause minimal delay to the construction programme. You must allow time for all the necessary laboratory testing, and return groundwater and ground gas monitoring visits, which can take several months.

From: Barge, Melanie [REDACTED]
Sent: Tuesday, August 19, 2025 3:09 PM
To: info@limesdownsolar.co.uk <info@limesdownsolar.co.uk>
Cc: South West ePlanning <e-sw@HistoricEngland.org.uk>
Subject: RE: Lime Down Solar Park - Potential Main Issues for Examination Letter

Historic England Response
HE Ref: PL00795841
EN010168

Thank you for the letter outlining the potential main issues for examination for the proposed Lime Down Solar DCO application.

We can confirm that we agree to the status of the two issues raised.

However in our view this does not fully deal with concerns we raised in our response to the PEIR (later dated 19 March 2025).

We would request that issue 1 includes all archaeological works. Until we see the evaluation reports and the overarching mitigation strategy, we cannot be confident that the significance of any archaeology is fully understood or mitigated appropriately, either through excavation or preservation within the development. Our position and recommendation from our PEIR letter should be referred to and I have copied it below:

Historic England position and recommendations

Historic England at this stage cannot provide detailed comments on the impacts or mitigation as full assessments and surveys have not yet been undertaken. As part of the DCO submission, we would expect to see:

- Detailed impact assessments for designated heritage assets that may be affected by the proposals (Historic England would review impacts on the highly graded assets within our remit)
- Results of archaeological evaluation with assessment of the significance of remains.
- A Draft Archaeological Mitigation Statement
- Overarching Written Scheme of Investigation.
- Details on off-site ecology and BNG mitigation proposals.

With regards to Bradfield Manor, issue 2:

In our last advice letter of 27th May 2025, we concluded that the proposed development would result in harm to the setting of Bradfield Manor, and following the site visit we requested that the photographs taken from the parlour block should be used to produce accurate "worst case scenario" visualisations, showing the extent of the panels' visibility, if raised to their maximum height.

The updated information contained within Table 2, and specifically Ref:2, now proposes that solar PV panels have now been omitted from the southernmost part of D5. In addition to proposed augmented hedgerows throughout Lime Down D, the proposals now include a new woodland block along the southern boundary of D5, reinstating an area of woodland illustrated on the Tithe plan.

While these adjustments are welcomed, we would still need to see evidence of what the potential impacts are likely to be. Once the omitted southern portion of D5 has been determined and amended on plan, together with details and the extent of the further landscape mitigation, we would still need to see some visualisations to demonstrate what would be visible from Bradfield Manor. We would then be able to advise further and suggest any additional amendments or mitigation that would minimise or remove the harm.

We would hope to see these amendments and information within the ES submitted as part of the DCO application.

Please note that Simon Hickman has now left Historic England. I will be your main contact going forward but could you please also include the South West e-mails in any future correspondence. You do not need to include the Applications West, Government Advice or Communications e-mails.

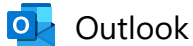
Kind Regards

Mel Barge (Ms)
Inspector of Ancient Monuments
Gloucestershire, South Gloucestershire, Bristol,
Bath and North East Somerset,
Wiltshire and Swindon
Planning Group

[REDACTED]

Tel: [REDACTED]
Mobile: [REDACTED]





RE: Lime Down Solar Park - Potential Main Issues for Examination Letter

From Tiffany Bate [REDACTED]
Date Tue 8/12/2025 8:52 AM
To Laius, Laura [REDACTED] info@limedownsolar.co.uk <info@limedownsolar.co.uk>
Cc Barrett, Will [REDACTED] L.media.uk
<media.uk@nationalgrid.com>

1 attachment (204 KB)

Lime down Solar Park NGET PMIE.pdf;

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Hi Laura,

Thank you for sending over the PMIE letter. I'm not familiar with this type of document, I'm assuming it's been included as part of procedural guidance updates last year. Please reach out if I've misinterpreted at all.

Please find the attached on behalf of National Grid Electricity Transmission PLC (NGET).

I believe as a minimum that 'Protective Provisions' should be included as a potential main issue; NGET stipulate that adequate PPs will be required to be included in the order, but reserve our position in relation to other issues we identify once we've had sight of the final documentation.

I hope the attached is in the form you need, but please don't hesitate to contact me directly should you have any questions.

Many thanks.
Kind regards

Tiffany

Tiffany Bate

Lead Development Liaison Officer
Customer Connections Site Solutions
Land, Planning and External Affairs
nationalgrid

+ [REDACTED]

Lime Down Solar Park - Potential Main Issues for Examination

Planning Inspectorate Case Reference: EN010168

Appendix A - Potential Main Issues for Examination with National Grid Electricity Transmission

Table 2 Potential Main Issues for Examination

REF	Issue	RAG
NGET Protective Provisions'	NGET requires its preferred form of Protective Provisions' to be included within the DCO to ensure that its existing assets and interests [and future assets/interests, where required] are adequately protected, as well as to ensure compliance with relevant safety standards.	Medium risk-likely to be resolved before the close of examination stage.
NGET Protective Provisions'	NGET has not been provided with the draft DCO documentation as yet and is therefore unable to advise on whether there are any additional potential issues of concern. NGET reserves the position in relation to other issues we identify once we've had sight of the final documentation.	Low risk-highly likely to be resolved before the close of examination stage.



Outlook

Lime Down Solar Park - Potential Main Issues for Examination Letter

From Eleanor Ward

Date Fri 8/15/2025 4:38 PM

To info@limesdownsolar.co.uk <

Cc

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Hello Laura, thank you for sharing this correspondence.

At present National Highways has not identified any issues with the DCO proposals that require logging for consideration at Examination.

However, I would emphasise that there are still a number of areas where we await further information in order to provide fully informed advice on the potential DCO implications for the Strategic Road Network. While emerging Transport Assessment work was shared at a recent meeting, this requires full review in its final form. In addition, the agreement of the cable routing and M4 crossing works—along with the associated third-party legal agreements—remains outstanding. I am also aware that our legal colleagues are currently engaged on matters relating to Protective Provisions.

These elements would be useful to pick up within a SoCG and, if necessary, may be raised in the PMIE in due course.

Best wishes, Eleanor

Eleanor Ward Spatial Planner

Operations (South West)

National Highways

Tel:

From: Laius, Laura

Sent: 08 August 2025 15:17

To:

Subject: Lime Down Solar Park - Potential Main Issues for Examination Letter

Some people who received this message don't often get email from

Date: 20 August 2025

Our ref: 522468

Your ref: EN010168



Will Threlfall

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear [Click here to enter text.](#)

Lime Down Solar Park - Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010168

Thank you for consulting Natural England on the Potential Main Issues for Examination. 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 development.

In addition to the issues listed in the PMIE, there are a number of other potential issues raised in Natural England's previous responses to statutory and non-statutory consultations which have not yet fully been resolved. Further detail on these is provided below.

Habitats Regulations Assessment

Bath and Bradford on Avon Bats SAC

Proposals are yet to be finalised for the Melksham Substation and the Cable Route search area including working methods and avoidance and mitigation proposals. Further, consideration of the areas of the site which are functionally linked to the SAC is still being undertaken. A full assessment of the potential impacts of the proposed development has therefore not yet been possible.

Severn Estuary Ramsar

The extent and scope of the water crossing for the pipeline route and assessment of the potential impact of EMFs on eels (a feature of the Severn Estuary Ramsar) has not yet been

provided. A full assessment of the potential impacts of the proposed development on the Ramsar has therefore not yet been possible.

Landscape

In addition to Natural England's advice regarding Lime Down C highlighted in Appendix A of the PMIE, Natural England's advice provided in response to the Preliminary Environmental Information Report consultation highlighted that Lime Down A is directly adjacent to the Cotswolds National Landscape with panels proposed in the northern extent of Lime Down A likely to be visible from the National Landscape. Subsequently, our advice was that panels are removed from these fields to reduce effects on the National Landscape.

Soils and Best and Most Versatile Agricultural Land

Natural England's advice provided in response to the PEIR consultation noted that further soil surveys, including surveys the cable route corridor, are underway, this information is needed to inform development proposals and demonstrate impacts to BMV land have been avoided as far as practicable. This information should be used to inform a commitment to return BMV land required temporarily for the development to its original grade post development.

We would be pleased to discuss the remaining issues with the applicant prior to examination, it is likely that many of the issues highlighted will be possible to resolve prior to or before the close of examination.

If you have any queries relating to the advice in this letter please contact me on [REDACTED]
[REDACTED]

Please consult us again once the information requested above, has been provided.

Yours sincerely


Amelia Earley

Wessex Team



RE: Lime Down Solar Park - Potential Main Issues for Examination Letter

From Ann-Marie Wood [REDACTED]
Date Tue 8/19/2025 11:18 AM
To Laius, Laura [REDACTED] Lime Down Solar Park <info@limedownsolar.co.uk>
Cc [REDACTED]

 1 attachment (291 KB)
Lime Down PMIE Letter Wessex Water.pdf;

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Report Suspicious

Dear Sirs

Thank you for consulting us with regards to the Solar Park Development, we have completed the table attached. We have previously advised of issues with Water Supply, we are not able to meet the requested demands without detriment to existing customers and the wider network. Further to this in previous correspondences we have advised about the risk of groundwater contamination. Both issues are serious with significant impacts and will need to be addressed.

Kind regards
Ann-marie

Note: These comments are based upon known circumstances prevailing at the time of writing. A review of the contents of this email is required where 18 months or more have elapsed since issue or in the light of significant changes likely to impact upon the response (e.g. changes in development numbers or phasing). Please email review requests to planning.liaison@wessexwater.co.uk

Ann-marie Wood
Senior Planning Liaison Engineer



Wessex Water
[REDACTED]
[REDACTED]

Web ytl.com | wessexwater.co.uk

Appendix A - Potential Main Issues for Examination with Wessex Water

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG
	<p>Water Supply We have previously made applicant aware of issues with their proposed demand capacity is not available to provide the required demand basedon the figures they have provided causing detriment to existing customers across the wider network.</p>	RED
	<p>Groundwater Source We have made the applicant aware of potential contamination of groundwater supply. contamination Risk We requested a holding objection and requested hydrogeolical assessment</p>	RED

Appendix A - Potential Main Issues for Examination with Wessex Water

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG
	LAND HELD FREEHOLD BY WESSEX WATER IN TITLE WT 272836 IS ASSOCIATED WITH OUR STATUTORY DUTIES AS A REGULATED SEWERAGE UNDERTAKE. ANY IMPACT OF THE SCHEME ON THIS LAND WILL INJURIOUSLY AFFECT OUR UNDERTAKING.	
	WESSEX WATER'S LAND IS HELD FOR OPERATIONAL SEWAGE TREATMENT PURPOSES AND SHOULD THEREFORE BE AVOIDED BY ANY CABLES OR WORKS.	

From: Planning Liaison
Sent: 08 September 2025 12:18
To: [REDACTED] <[REDACTED]>
Subject: RE: Lime Down Solar Park - Potential Main Issues for Examination Letter

Dear Laura,

I write further to your email regarding the PMIE letter.

As the Planning Inspectorate has advised you, Wessex Water is saying that we don't have any main issues for consultation. However, referring back to Wessex Water initial response and the comments in the Scoping Opinion report from the Planning Inspectorate copied below, is the fact that it is being built over the Great Oolite aquifer and that a Hydrogeological Risk Assessment should be undertaken not a main issue and RAG rating red.

			Construction and operation of the Proposed Development
35.11	n/a	Hydrogeological Risk Assessment	<p>The Applicant's attention is drawn to Wessex Water's response to consults 2 of this Opinion) with regard to the presence of the Great Oolite aquifer w boundary and the potential for impacts to this aquifer from polluting substa from the construction and operation of the Proposed Development.</p> <p>The Inspectorate considers that a Hydrogeological Risk Assessment shou of the potential pollution sources arising from the Proposed Development : pathways through to the aquifer. The scope of the assessment should be : relevant consultation bodies and should consider the use of buried fluid fill form part of the proposal and potential usage of perfluoroalkyl substances components of the Proposed Development. Cross reference should be ma Ground Conditions and Contamination ES Chapter.</p>

If you require any further information, please do not hesitate to contact us.

With kind regards,

Hayley Freeman
Planning Liaison Technician



Wessex Water

[REDACTED]

[REDACTED]



Disclaimer

22nd August 2025

Will Threlfall
Senior Project Development Manager
Lime Down Solar Park Limited

Development Management
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Will,

RE: Lime Down Solar Park – Potential Main Issues for Examination (Planning Inspectorate Case Reference: EN010168)

Thank you for your letter dated 8th August 2025 requesting that the council reviews and provides confirmation on whether Wiltshire Council agrees with the status of potential issues for the Lime Down Solar Park scheme as set out in Appendix A of your letter. The council was also afforded the opportunity to identify any further issues that should be included within the PMIE table.

The council further appreciates that a small extension for this response was agreed, whereby the council's response could be submitted on 22nd August 2025 instead of 20th August.

Wiltshire Council has reviewed Appendix A and considers that the identified PMIE issues (references 1-14) of the Appendix have the potential to be resolved prior to the close of the examination, and therefore the "Amber" RAG rating seems appropriate at this stage. However, whether the issues can be resolved will be entirely dependent on the sufficiency of the assessment information and mitigation approach contained within the Environmental Statement (ES), which the council has not yet had an opportunity to review due to it not being available until after DCO application submission and publication. Therefore, there is also the potential that these issues may remain unresolved at the close of the examination.

The final PMIE issue identified in Appendix A (which the council has assumed to be number 15, but for which no reference number was indicated) relates to the use of concrete feet as an adequate archaeological mitigation measure. Following discussions with the Applicant's consultants, Lanpro, it is understood that potential impacts from solar panels with either be mitigated via scoping out or Strip Map and Record excavation of complex sites and funerary monuments, as well as the customised location of panels to avoid isolated features such as enclosure ditches. Given that Lanpro have agreed to mitigate any archaeologically sensitive areas prior to any construction, and whilst the council will need to satisfy itself that the overarching archaeological mitigation strategy within the ES and subsequent Written Schemes of Investigation (WSI), which the council has not yet had the opportunity to review

as not currently available, are sufficient, it is considered that this issue may be able to be RAG rated “Green” provided that the approach indicated above is correct.

Following Wiltshire Council’s review of the latest iteration of the Issues Tracker and other project information, the council would also identify the following issues as PMIE at this stage:

Ref	Issue	RAG
16	Ecological baseline information and details of mitigation and compensation are not sufficient for an informed and robust review	
17	Breeding Birds – Fields which have the greatest number of skylark territories, such as Field C10, should not be subject to installation of solar panels, but instead retained and protected in accordance with the mitigation hierarchy	
18	Great Crested Newt - Clarity need on how many ponds are yet to be surveyed around the Solar PV Sites and exactly what survey is outstanding and where. Clarity is also needed on if the DLL route will be used or will surveys be conducted in 2025	
19	Great Crested Newt – Due to the amount of outstanding survey and gaps in the ecological baseline information, it is not known whether a suitably informed and comprehensive mitigation strategy has been formulated	
20	Designated Sites – The assessment appears to downplay the loss of permanent pasture, and the Council has not been provided with the finalised assessment indicating areas of permanent pasture to be retained compared to those which will be lost	
21	Concerns that no additional mitigation measures beyond buffer zones are proposed to compensate for the loss of bat foraging habitat even though emerging evidence is increasingly suggested 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. Areas of permanent pasture on the Solar PV sites should be retained as far as reasonably practicable	
22	Construction Phase Impacts – Further information needed on how security lighting during the construction phase will impact roosting bats	
23	Potential impacts on habitat used by qualifying species of the BBOA Bats SAC and the need for an HRA	
24	Operation Phase Impacts – The assessment should fully consider the impact of permanent pasture loss on bat foraging and that a precautionary approach must be taken when considering impacts on bat activity over fields containing solar panels. Sufficient evidence and further information is needed to augment the applicant’s conclusion of no significant adverse effect on foraging / commuting bats during the operational phase	
25	Sufficiency of mitigation strategy for ground nesting birds	
26	Council cannot fully assess the impact on trees due to insufficient detail in the submitted Arboricultural Report and Tree Constraints Plans. All	

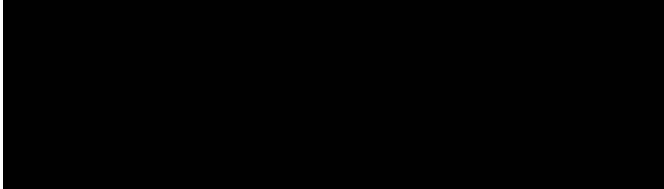
Ref	Issue	RAG
	arboricultural features should be considered in the ES, as the cable route and its impact on trees remain undefined.	
27	Clarity needed on whether modifications to the National Grid Melksham Substation require planning permission, and whether noise from enabling works will be controlled – the council requires a BS4142 noise assessment for these works	
28	Insufficient information has been provided to the Council for it to consider the likely potential effects of this scheme and ensure that sufficient mitigation is included within the DCO application submission to minimise any adverse impacts on Wiltshire and its communities	
29	Due to the applicant's refusal to undertake a supplementary public consultation on this scheme, it has not been possible to consider the cable connection route surveys and further assessment information to ascertain whether the full environmental effects of the scheme have been robustly identified	
30	For the proposed Change 7 within the Targeted Consultation change 7, it may encroach into an area of ancient broadleaved woodland and priority habitat / HPI that is known as North Bincombe Wood and is also designated as a CWS named Rodbourne Plantation. As such, works in this CWS / ancient woodland would be contrary to Core Policy 50 of the Wiltshire Core Strategy and National Planning Policy Framework (NPPF) and it is recommended that this proposed revision is not taken forward and that an alternative is identified.	
31	Table 3.1 of the Scoping Note relating to the CTMP / TS shows the projected number of HGV movements associated with the construction of the Lime Down A-E areas. However, there is no supporting information advising how the figures are arrived at. Furthermore, the HGV movements required for the cable connection route have not been identified. The council requires the supporting information on material / component quantum for verification that the movements identified in the ES have been suitably calculated and the resultant impacts assessed and mitigated.	

The council welcomes the Applicant's indication that a Statement of Common Ground (SoCG) will hopefully be prepared between the Applicant and Wiltshire Council and that the PMIE document will inform the SoCG. However, the council considers that it is necessary to highlight at this stage, that further issues and areas of potential disagreement may be identified once the council has had the opportunity to review the ES and supporting assessment information. As such, it is the council's expectation that the SoCG will be a "live" document during the course of the examination.

Please accept this response as confirmation that Wiltshire Council is content for this letter to be submitted to the Planning Inspectorate within the Applicant's PMIE submission. However,

please do not hesitate to contact me, or the appropriate member of my team, should you wish to discuss anything within the council's response.

Yours sincerely,



Nic Thomas
Director of Planning, Economy and Regeneration
Direct line: [REDACTED]
Email: [REDACTED]