



Lime Down

Solar Park

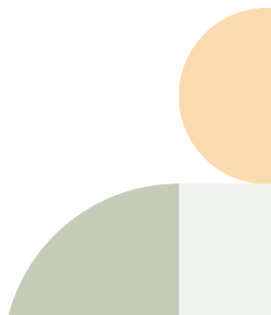
Environmental Statement

Volume 3, Appendix 8-5: Landscape

Consultation Record

September 2025
Revision 1

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Council Name	Feedback	LVIA Response
Cotswolds National Landscape	<p>"Dear Sir/Madam,</p> <p>Lime Down Solar Park Stage Two Community Consultation: Cotswolds National Landscape Response</p> <p>Thank you for consulting the Cotswolds National Landscape Board1('the Board') in connection with the above proposed solar park, where three of the constituent sites, Lime Down A, B and C and the Cable Route Search Corridor are located within the setting of the Cotswolds National Landscape ('the CNL')2.</p> <p>It is understood that the proposed development is to be advanced under the Nationally Significant Infrastructure Project ('NSIP') regime outlined within the Planning Act 2008, seeking the approval of a Development Consent Order ('DCO') from the Secretary of State for Energy Security and Climate Change. The Board is a statutory consultee in respect of this NSIP as outlined at Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as the proposed application is likely to affect the Cotswolds National Landscape. We note that the design of the scheme has yet to be finalised and that through design evolution and iteration, there is potential for some adverse effects to be designed out as well as further mitigation and enhancement provided. However, having reviewed the Preliminary Environmental Information Report ('PEIR') and its appendices and having visited the proposed Lime Down sites, the Board considers that the proposal as consulted upon has the potential to give rise to significant adverse environmental effects upon the Cotswolds National Landscape designation and its setting. It would also fail to further the purpose of CNL designation in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000."</p>	<p>Noted. The design of the Scheme has been further refined to address these concerns.</p>
Cotswolds National Landscape	<p>"Annex 1 below provides the Board's assessment of the Applicant's PEIR in respect of landscape and visual impact, transport impacts upon tranquillity and glint and glare impacts. We make several</p>	<p>The proposals follow the mitigation hierarchy to prevent/ avoid, mitigate and restore and finally offset or, failing that,</p>

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	<p>recommendations for amendments or additions to the Applicant's masterplans and Environmental Statement ('ES') in advance of the submission of a DCO application in order that the potential effects of the proposal upon the CNL and its setting are adequately assessed, avoided or mitigated. These include:</p> <ul style="list-style-type: none"> • The ES should consider the requirements of NPPF paragraph 189 that development within the setting of the CNL should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas. • The ES should consider the CNL as a standalone receptor when assessing impacts of the proposal upon landscape character, visual and special qualities. • Viewpoint 6 should be relocated to the corner of Bustlers Hill at the junction with the path leading to bridleway SHER16. • Panels should be removed from several fields, in particular A11, A12, C2, C3 and C4 to avoid significant adverse landscape and visual effects on the CNL and its setting. These areas should be identified for habitat enhancement to further the purpose of CNL designation. • Pending the results of further assessment, consideration should also be given to removing the southern part of field A1, the remainder of field C6 and fields C7 and C9 and identifying these areas for habitat enhancement. • The ES should consider the impact of construction traffic upon the CNL, both by identifying the CNL as a receptor in the Transport Assessment in respect of impacts on tranquillity from increased traffic movements (in particular HGV movements) and also consider impacts upon the landscape and scenic beauty of the CNL from this increased traffic within the LVIA chapter. • Construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty. • The Glint & Glare Assessment should be expanded to provide more thorough consideration of potential heliographic effects on 	<p>compensate in order to reduce development impacts and control any negative effects on the environment. Parcels within the setting of the CNL, on the boundary of the CNL have been removed from the scheme.</p> <p>Paragraph 189 of the NPPF is considered in the ES and has directed the design with the removal of all fields on the boundary of the CNL or within its immediate setting. The CNL is fully assessed as its own standalone receptor in Appendix 8.6 Assessment of CNL and Special Qualities of Chapter 8-Landscape and Visual, which assesses the impacts of the proposal upon landscape character, visual amenity and the CNL's special qualities and addresses how the Scheme seeks to further the purpose of the National Landscape's designation.</p> <p>Following consultation with Officers from the CNL, Viewpoint 6 has been relocated as requested.</p> <p>Panels have been removed from fields A11, A12, C2, C3 and C4 to avoid significant adverse landscape and visual effects on the CNL and its setting. All fields on the edge of the CNL provide habitat enhancement which furthers the purpose of the CNL designation and have been informed by the CNL Management Plan and the Cotswolds National Landscape</p>

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	<p>receptors located on public rights of way within the CNL and looking back towards the CNL.</p> <p>Please do not hesitate to contact me if you wish to discuss this response further. Yours sincerely, Simon Joyce MRTPI Planning Officer"</p>	<p>(AONB) Landscape Strategy and Guidelines'</p> <p>The construction traffic routes have been selected to avoid roads within the CNL where practicable. The construction traffic routes include roads within the CNL where it was not possible to avoid doing so without the use of unsuitable roads. ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] includes an assessment of the impacts of traffic on the Special Qualities of the CNL, however ES Volume 1, Chapter 13 Transport and Access [EN010168/APP/6.1] identifies traffic impacts specifically.</p> <p>ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3] includes an assessment of the effects upon requested viewpoints that demonstrate views to and from 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] includes an assessment of the impacts of Glint and Glare on the Special Qualities of the CNL.</p>
Cotswolds National Landscape	"ANNEX 1 COTSWOLDS NATIONAL LANDSCAPE RESPONSE TO EIA SCOPING CONSULTATION IN RESPECT OF THE PROPOSED LIME DOWN SOLAR PARK	Noted.

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	<p>Preamble</p> <p>The Board has previously responded to the Applicant's non-statutory Phase One Consultation in April 2024 and to the Planning Inspectorate's Environmental Impact Assessment Scoping Consultation in August 2024. These responses are appended here at Appendices 2 and 3. This response has been informed by site visits conducted by the Board's Planning Officer in August 2024, October 2024, January 2025 and February 2025. The latter two visits were site meetings also attended by the applicant's Landscape Consultants Lanpro and Wiltshire Council's Senior Landscape Officer."</p>	
Cotswolds National Landscape	<p>"Policy backgroundStatutory duty to seek to further the purpose of Cotswolds National Landscape designationIn reaching his decision in respect of a future DCO application, the Secretary of State for Energy Security and Climate Change has a statutory duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape3('the duty') and the Secretary of State should explicitly address the duty within the DCO decision letter, including an explanation of how he considers the duty has been discharged.Further information on this new duty is provided in Appendix 1 below and the Board recommends that, in fulfilling this 'duty to seek to further the purpose', the Secretary of State should: (i) ensure that planning decisions are consistent with relevant National Policy Statements, national and local planning policy and guidance; and (ii) take into account the following Board publications4• Cotswolds National Landscape Management Plan 2023-2025 (link); in particular Policies CE1 (Landscape), CE4 (Tranquillity), CE5 (Dark Skies), CE7 (Biodiversity and Nature Recovery), CE10 (Development and Transport) and CE11 (Major Development);• Cotswolds AONB Landscape Character Assessment (link) particularly, in this instance, with regards to Landscape Character Types (LCT) 11 (Dip-Slope Lowland) and 14 (Cornbrash Lowlands) in relation to Site A and Site C and LCT 9 (High Wold Dip Slope) and 11 (Dip</p>	Noted.

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	<p>Slope Lowland) in relation to the construction traffic access route;• Cotswolds AONB Landscape Strategy and Guidelines (link) particularly, in this instance, with regards to LCT 9 (link), including Sections 9.13 and 9.14, LCT 11 (link), including Sections 11.4, 11.12 and 11.13 and LCT 14 (link), including Section 14.4;• Cotswolds AONB Local Distinctiveness and Landscape Change (link);• Cotswolds National Landscape Climate Change Strategy (link);• Cotswolds National Landscape Board Position Statements (link) particularly, in this instance, with regards to the Renewable Energy Position Statement (link), in particular section 3.4.4, Development in the Setting of the AONB (link) and Tranquillity Position Statement (link), in particular sections 4.4 and 5.2. Whilst the discharge of the duty is primarily a matter for the Secretary of State as the 'relevant authority', we also wish to take this opportunity to highlight the duty to the Applicant and strongly recommend that they refer to the Board's policies and guidance referenced above within their Environmental Statement ('ES') and give explicit consideration as to how the proposal seeks to further the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape in order to assist the Secretary of State in discharging the duty. We would also highlight that the Board's standing advice relating to the duty included at Appendix 1 has been amended to reflect guidance from Defra and the National Landscapes Association published since our previous consultation response and therefore supersedes our previous standing advice."</p>	
Cotswolds National Landscape	<p>"National Policy Statements relating to National Landscapes</p> <p>NPS EN-1</p> <p>Section 5.10 of the National Policy Statement for Energy ('NPS EN-1') identifies that virtually all NSIPs will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation. Projects need to be designed carefully, taking account of the potential impact on the landscape.</p>	<p>The LVIA identifies and describes any significant effects on the natural beauty of the CNL and its setting. ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [EN010168/APP/6.3] includes an assessment of the impacts on the Special Qualities of the CNL</p>

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	<p>Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.</p> <p>Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case by-case judgement.</p> <p>NPS EN-1 states that National Landscapes (AONBs) have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints.</p> <p>Paragraph 5.10.8 states that the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.</p> <p>Paragraph 5.10.34 also confirms that the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a</p>	<p>ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3] also addresses how the scheme seeks to further the purpose of the National Landscape's designation.</p>

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	<p>reason for the Secretary of State to refuse consent.</p> <p>For projects which may affect a National Landscape, the Applicant's assessment should include effects on the natural beauty and special qualities of these areas (paragraph 5.10.20). The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation (paragraph 5.10.21). The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions, from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised (paragraph 5.10.22)"</p>	
Cotswolds National Landscape	<p>"NPS EN-3</p> <p>Chapter 2.10 of National Policy Statement for Renewable Energy Infrastructure ('NPS EN-3') deals with solar photovoltaic generation projects and paragraph 2.10.96 states that landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the preapplication process.</p> <p>Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints (paragraph 2.10.97).</p> <p>Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes. Whilst there is an acknowledged need to</p>	<p>The proposed scheme follows the criteria for good design set out in Section 4.7 of EN-1. In relation to the CNL, the mitigation hierarchy has been used in the first instance to avoid harm to the CNL.</p> <p>An LVIA has been undertaken as part of the ES and includes visualisations to demonstrate the visual effects of the proposed solar farm. The effects on the setting of heritage assets has been assessed separately in the Heritage Chapter. However, information from the Heritage Assessment has been referenced in ES Volume 3, Appendix 8.6 Assessment of CNL and Special Qualities [EN010168/APP/6.3].</p> <p>The proposed scheme retains all existing hedgerows established vegetation where</p>

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	ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact. The Applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries."	practicable, including mature trees within boundaries with these protected within buffers incorporated into the scheme design to minimise impacts. Mitigation measures and areas of positive enhancement within the setting of the CNL have been maximised and an Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] prepared to ensure future maintenance.
Cotswolds National Landscape	"Development within the setting of the Cotswolds National LandscapeIt is understood that the proposed solar park extends to a total of 878ha comprising five sites. Three of the five sites, Lime Down A, Lime Down B and Lime Down C, are either located directly adjacent to the CNL boundary or extend to within 200m of the CNL's boundary at their closest point. Accordingly, the Board considers that these three sites (A, B and C) are located within the setting of the CNL. The proposed Cable Search Route Corridor is also partly located within the CNL.In addition to the National Policy Statements discussed above, paragraphs 187 and 189 of the National Planning Policy Framework ('NPPF') provide the highest status of protection for the landscape and scenic beauty of National Landscapes. Paragraph 187 states that planning decisions should both contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan. Paragraph 189 then outlines the 'great weight' to be given to the conservation and enhancement of the landscape and scenic beauty of National Landscapes. This 'great weight' is relevant in this instance as the site forms part of the National Landscape's setting and a development of the scale proposed could, in the view of the Board, potentially have a significant adverse impact on its landscape and visual character and quality.Furthermore, the requirement that development within the	Comment noted.

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	<p>setting of National Landscapes “should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas” was also added into what is now paragraph 189 with the July 2021 publication of the NPPF. Any adverse effects on the National Landscape need to be assessed properly and be fully considered when determining this application, with the appropriate weighting applied in the decision. The Board’s Position Statement on Development in the Setting of the AONB referred to above outlines how the surroundings of the Cotswolds National Landscape are also important to its landscape character and quality. Development proposals that affect both views into and out of the National Landscape need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the National Landscape.”</p>	
Cotswolds National Landscape	<p>"The National Planning Policy Guidance ('NPPG', 2014, Paragraph: 039 Reference ID: 8-039-20190721) also confirms in relation to the former Section 85 duty5(that relevant authorities 'shall have regard' to their purposes for which these areas are designated) that “This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.” Although the Section 85 duty has now been amended by the duty at Section 245 of the Levelling Up and Regeneration Act, until the NPPG is updated the Board considers the NPPG to be equally relevant to the new duty in this respect.</p> <p>A High Court decision (Stroud District Council v Secretary of State for Communities and Local Government (Gladman Development Ltd) February 2015) helps to confirm the application of what is now paragraph 189 of the NPPF as far as 'great weight' is concerned. Mr Justice Ouseley stated in this case that paragraph 115 (now paragraph 189) of the NPPF “certainly covers the impact on the</p>	<p>Comment noted. The LVIA considers both views to and from the CNL.</p>

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	<p>scenic beauty of the land actually within the AONB. It seems to me that it would be unduly restrictive to say that it could not cover the impact of land viewed in conjunction with the AONB from the AONB. But to go so far as to say that it must also cover land from which the AONB can be seen and great weight must be given to the conservation of beauty in the AONB by reference to that impact reads too much into paragraph 115."</p> <p>The above decision helps to clarify that there are differing ways of assessing impacts on the setting of the National Landscape which require the application of different policies and guidance: (i) harm directly to land in the designated National Landscape itself from views out of the National Landscape and between parts of the National Landscape towards new development in its setting (where paragraph 189 of the NPPF is relevant) and: (ii) as a separate material consideration, harm to land outside the designated National Landscape, for example views of new development in the context or backdrop of the National Landscape (where paragraphs 189 or 190 is not relevant).</p> <p>Any impact upon views back towards the National Landscape, from outside the National Landscape, may be a separate material consideration and subject to separate policy and guidance, for example paragraph 187 of the NPPF also states that planning decisions should contribute to and enhance the natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan."</p>	
Cotswolds National Landscape	<p>"The Board's position on large-scale solar energy proposals</p> <p>The Board's Vision, outlined at Section 2 of the Cotswolds National Landscape Management Plan 2023-2025, was drawn up in the light of the interlinked issues of the climate emergency, nature's decline and the ecological crisis and health and societal changes. Outcome 1 of the Management Plan relates to climate action, stating that the</p>	Comment noted.

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	<p>National Landscape is a place that is mitigating and adapting to climate change, and has a clearly defined pathway towards net zero emissions. Section 3 of the Management Plan clearly outlines that some climate change mitigation and adaptation measures have the potential to adversely affect the natural beauty of the National Landscape, but with careful design and implementation, many of these measures can not only conserve but also enhance natural beauty. The challenge is to develop a pathway to net zero which also conserves and enhances natural beauty.</p> <p>Management Plan policy CC1 advocates 'generating energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation'. This is expanded upon within the Board's Renewable Energy Position Statement, wherein paragraph 3.4.4.13 details the Board's current position on large-scale solar energy proposals such as this. It states that "In principle, the Board would not be supportive of solar energy schemes larger than five hectares in size. For larger schemes that might be put forward, Applicants should be required to demonstrate that the scheme could be accommodated without significantly affecting the natural beauty of the CNL". Whilst this is written primarily in relation to proposals located within the CNL, it is also relevant to applications within its setting, particularly those of a scale such as Lime Down.</p> <p>As such, the Board considers that it is essential that the ES prepared in support of the DCO application demonstrates that the scheme can be accommodated without significantly affecting the natural beauty of the CNL and at the same time seeks to further the purpose of the National Landscape's designation."</p>	
Cotswolds National Landscape	<p>"Landscape and Visual Impact (comments upon PEIR Volume 1, Chapter 8 and accompanying figures and appendices)</p> <p>Our previous responses, attached at Appendices 2 and 3 of these representations, outline the Board's baseline assessment of the</p>	Comment noted.

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	relationship between the site and the CNL. We consider that sites A, B and C and parts of the Cable Route Search Corridor are located within the setting of the Cotswolds National Landscape. We consider that sites D and E are not located within the setting of the Cotswolds National Landscape."	
Cotswolds National Landscape	Section 8.3 of the PEIR provides a useful overview of relevant legislation and policy. We welcome the inclusion of the duty to seek to further the purpose of CNL designation (s.85 of the Countryside & Rights of Way Act 2000 and s.245 of the Levelling-up and Regeneration Act 2023) and the National Landscapes Association Briefing note within Section 8.3 of the PEIR. As mentioned above, Appendix A of these representations provide further guidance on how the Board considers this duty should be addressed and constitutes the Board's standing advice on the duty.	Comment noted.
Cotswolds National Landscape	The discussion of the NPPF requires some updating in respect of paragraph numbers to reflect the current December 2024 version and mention of the requirement that development within the setting of National Landscapes "should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas" should be made within the discussion of NPPF paragraph 189 at paragraph 8.3.21 of the PEIR. This is an important requirement of national planning policy which should be given due consideration in the development of the proposal.	Noted and updated for the ES. Avoidance measures to minimise adverse impacts on the CNL have resulted in the removal of parcels.
Cotswolds National Landscape	We also welcome the inclusion of the Board's Management Plan within Section 8.3. A new version of the Management Plan covering the period 2025-2030 has recently been adopted by the Board and will shortly be made available on the Board's website ¹ . Once it is published this new Management Plan should be referred to in the preparation of the forthcoming ES.	Noted and updated for the ES.
Cotswolds National Landscape	We note the assumptions and limitations at Section 8.4 that the scheme design and assessment is an iterative process and welcome the opportunity to participate in this process. We note that the design of the scheme has yet to be finalised and that through design evolution and iteration, there is potential for some adverse effects to be designed out. The full assessment of the final scheme	Liaison has taken place to undertake iterative design work to test the visibility of panels in Site A and C.

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	designed submitted with the DCO application will be reported in the ES.	
Cotswolds National Landscape	Our comments made within these representations are solely based upon the plans and accompanying assessments presented here for consultation. Any future assessments by the Board may also be amended to consider additional wintertime fieldwork, photography, visualisations to AVR level 3 and the implications these may have for scheme design once fully assessed.	Noted. Winter views and AVR Level 3 photomontages provide the evidence base of the final assessment of effects.
Cotswolds National Landscape	We note that landscape character effects have been assessed for each Study Area (1km, 2km, 5km). The rationale provided for this is that due to the interconnected relationship landform has, the assessment for each Study Area considers the effect of the scheme on the landscape as a single receptor and ensures that the assessment looks at the effects of the Scheme on the “unique holistic patchwork of landscape character within each Study Area, and avoids focusing the assessment on the effects to individual local or national LCAs where it would be difficult to then ascertain the effect of the Scheme on the landscape character as a whole”.	The LVIA identifies and describes significant effects on the natural beauty of the CNL and its setting. The LVIA also address how the scheme seeks to further the purpose of the National Landscape’s designation. ES Volume 3, Appendix 8.6 Assessment of CNL and Special Qualities [EN010168/APP/6.3] includes an assessment of the impacts on the Special Qualities of the CNL.
Cotswolds National Landscape	Accordingly, no standalone assessment has been made of the scheme’s impact upon the landscape character of the CNL, either as a designation in its own right or the two individual Landscape Character Types (LCTs) identified within the Cotswolds AONB Landscape Character Assessment which are located adjacent to the site boundary (LCT 11 Dip-Slope Lowland and LCT 14 Cornbrash Lowlands) and whose character would potentially be impacted by the scheme.	A standalone assessment on the CNL has been undertaken for the ES and include an assessment of effects on the two Landscape Types within the 5km Study Area, and on the special qualities of the CNL. It also considers how the scheme will further the purpose of conserving and enhancing the natural beauty of the area. ES Volume 3, Appendix 8.6 Assessment of CNL and Special Qualities [EN010168/APP/6.3] includes an assessment of the impacts on the Special Qualities of the CNL.
Cotswolds National Landscape	"When assessing the impacts of the scheme on the 2km and 5km study areas, this approach appears to effectively reduce the weight given to impacts upon the CNL. For example, in Table 16 of Volume	Noted.

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	3, Appendix 8-3-1, 2km study area receptor susceptibility is assessed as medium, with it noted that "Although the Cotswold National Landscape has a High Susceptibility to Change, this forms only part of the 2km Study Area. Overall, the 2km Study Area has a Medium Susceptibility". This then has implications for the assessment of receptor sensitivity and resultant assessment of the level of effect of the proposal upon landscape character. Little consideration is also given to the presence of, or the impact of the proposal upon, the special qualities of the CNL.	The LVIA identifies and describes any significant effects on the special qualities of the CNL which contribute to its natural beauty as an individual receptor.
Cotswolds National Landscape	We consider that LVIAs should assess impacts on landscape character of the CNL designation (or its constituent LCTs) as a standalone receptor in addition to the 1km, 2km and 5km study areas. We consider that when assessing impacts upon the landscape character of areas within the CNL, a nationally designated landscape, the CNL and its constituent LCTs are of high value and high susceptibility to change and should not be subsumed into a wider assessment covering undesignated land outside of the CNL which may be attributed lower value in LVIA assessments.	The LVIA identifies and describes significant effects on the special qualities of the CNL which contribute to its natural beauty as an individual receptor. It is agreed that the CNL and its constituent LCTs are of high value and high susceptibility to change.
Cotswolds National Landscape	"Therefore, we recommend that impacts upon both the landscape character and visual qualities of the CNL and its constituent LCTs are considered on a standalone basis within the future ES informing and supporting the DCO examination submission. We will then be happy to comment upon an assessment of the scheme's potential impacts on landscape character, visual and special qualities."	Noted - as above.
Cotswolds National Landscape	"At this stage we also wish to comment upon the assessment provided for a number of receptors included in the table below. The table also outlines our recommendations to address the assessed likely significant adverse visual impacts upon the CNL. Our comments below are made considering the approach taken	A full assessment of Effects has been provided on the final Scheme layout.

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	<p>regarding embedded mitigation measures outlined at Section 8.8, where a mitigation hierarchy of i) prevent/avoid, ii) mitigate and restore and finally iii) offset, or failing that, iv) compensate is used to reduce development impacts and control any negative effects on the environment.</p> <p>In particular, we note the recommendation at paragraph 8.8.4 that “avoidance measures are incorporated into the design of the scheme in order to reduce development impacts and control any negative effects on the landscape, especially on sensitive receptors such as the Cotswolds National Landscape. These measures include avoiding development adjacent to the National Landscape where it would affect its setting; and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape”.</p>	
Cotswolds National Landscape	<p>"Lime Down A</p> <p>Receptor: TP026: Footpath WT SHER 12</p> <p>PVP: 4</p> <p>PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms: C. Moderate adverse Y1.Moderate adverse Y15 Moderate/minor adverse D. No effect</p> <p>CNLB comments: We agree with the assessment contained within Volume 3, Appendix 8.3.2.3 that receptors on this footpath within the CNL are classified as high in terms of value, susceptibility and sensitivity.</p> <p>However, we disagree that the magnitude of change resulting from the introduction of panels into fields A11 and A12 would be low at</p>	<p>Noted. Assessment has been reviewed as panels in A11 and A12 are removed.</p>

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	<p>construction and year 1, reducing to very low by year 15.</p> <p>The AVR 1 visualisations, in particular Figure 8-14-4, illustrate that the 4.5m high rotating panels would be highly visible in views along this footpath (a promoted route, the White Walls Way) and mitigative planting would be unlikely to screen views as suggested, even by year 15 due to the elevated position of this viewpoint.</p> <p>We consider that the proposal would result in a medium magnitude of effect at construction and year 1 and resultantly a major/moderate adverse significance of visual effect. It would be unlikely to reduce to a level which was not significant by year 15.</p> <p>CNLB recommendation: Remove all panels from both fields A11 and A12 and identify these fields for habitat enhancement"</p>	
Cotswolds National Landscape	<p>"Lime Down AReceptor: TR044: Bridleway WT SHER 14PVP: 3PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms: C. Major/Moderate adverseY1. Major/Moderate adverseY15 MinorD. No effectCNLB comments: This is a long section of road from near Sherston towards Foxley on the boundary to the Cotswold National Landscape. We note that there is no separate assessment for bridleway SHER14 which joins this road at PVP3, on the CNL boundary. We agree that receptor value should be high and susceptibility is medium, resulting in a high-medium sensitivity. The AVR 1 visualisations at Figure 8-14-3, illustrate the potential height of the panels and how visible they would be from PVP3 and when travelling both east-west along the road and north-south along the bridleway. As such we agree with the assessment of a major/moderate adverse significance of effect at construction and year 1. However, we disagree that the mitigation planting would screen views to an extent where the magnitude of change and type of effect would be reduced from high/adverse at year 1 to very low/neutral by year 15. We consider it likely that there would remain at least a moderate adverse significance of effect at year 15. If</p>	Noted. Assessment reviewed as panels in A11 and A12 are removed.

Council Name	Feedback	LVIA Response
	panels were removed only from field A12, panels within field A11 would remain highly visible from PVP3 as well as from the road as it travels westwards along the northern boundary of A12 which marks the CNL boundary.CNLB Recommendation: Remove all panels from both fields A11 and A12 and identify these fields for habitat enhancement."	
Cotswolds National Landscape	<p>"Lime Down A</p> <p>Receptor: TP027: Footpath WT SHER 15</p> <p>PVP: CNL C</p> <p>PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms:</p> <p>C. Major/moderate adverse</p> <p>Y1. Major/moderate adverse</p> <p>Y15 Moderate adverse</p> <p>D. Minor adverse</p> <p>CNLB comments: This footpath passes through field A11 and provides views towards the CNL, the boundary of which is marked by the road running along the northern edge of the field. Some views of the church tower at Sherston (within the CNL) are possible when walking northwest.</p> <p>The indicative masterplan shows the footpath would be retained within a corridor with 4.5m solar panels on both sides. Views to the CNL and the church tower would be lost from construction onwards.</p> <p>We agree with the assessment of significant adverse effects from construction to the end of operation.</p>	<p>Noted.</p> <p>Assessment reviewed as panels in A11 and A12 are removed.</p>

Council Name	Feedback	LVIA Response
	CNLB Recommendation: Remove all panels from both fields A11 and A12 and identify these fields for habitat enhancement."	
Cotswolds National Landscape	<p>"Lime Down A</p> <p>Receptor: TR043</p> <p>PVP: 6</p> <p>PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms:</p> <p>C. Moderate adverse Y1. Moderate adverse Y15 Minor neutral D. No effect</p> <p>CNLB comments: In our previous comments we recommended that this viewpoint on the CNL boundary should be relocated a short distance east to the junction with Bustlers Hill and the path leading to bridleway SHER16 where a clearer view of the site is available and is a location more likely to be used by walkers and riders.</p> <p>We understand that this amendment will be actioned as part of the future submission and include wintertime photography and visualisations to AVR 1 and AVR 3 standards.</p> <p>We support the exclusion of the northern part of field A1 for habitat enhancement. We wish to reserve judgment as to the potential impact of the panels located within the southern part of field A1 until this further assessment has been carried out.</p> <p>CNLB Recommendations: Relocate this viewpoint to the corner of Bustlers Hill at the junction with the path leading to bridleway SHER16.</p>	<p>Sections and Photomontages have been used to test the visibility of the southern part of A1.</p> <p>The Viewpoint location for AVR 1 and AVR 3 photomontages have been relocated as requested.</p>

Council Name	Feedback	LVIA Response
	Possible removal of panels from the southern half of A1 pending the results of further assessment"	
Cotswolds National Landscape	"Lime Down CReceptor: TP077 Footpath WT LUCK 35PVP: 27, 30, 31PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms: C. Major adverseY1. Major adverseY15 Moderate adverseD. Moderate adverseCNLB comments: This footpath lies within the CNL to the west of the road between Sherston and Alderton and with clear views to the CNL (including the church tower at Alderton) for much of the stretch outside of the CNL between that road, passing viewpoint 30 and onto viewpoint 27 on Commonwood Lane. As such we agree with the assessed high receptor value, susceptibility and sensitivity. We support the exclusion of field C1 for habitat enhancement. However, panels would still be clearly visible for much of this stretch in fields C2, C3, C4 and C19, either from viewpoints within the CNL or when outside the CNL looking back towards the CNL and in some cases blocking the view of the church tower. Proposed mitigation along the field boundaries would not adequately screen views of the 4.5m panels which would create skyline effects for much of the stretch. We agree that there would be a major adverse effect on this receptor at construction and year 1, however disagree that by year 15 mitigation planting will have predominately screened views of the development and that the significance of effect would remain at least major/moderate.CNLB Recommendations: Remove all panels from fields C2, C3 and C4 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."	Noted. Assessment reviewed as panels in C2 C3 and C4 are removed.
Cotswolds National Landscape	"Lime Down C Receptor: TR040 Road from Alderton to Sherston past Widleys Farm PVP: WC1	Noted. Assessment reviewed as panels in C2 C3 and C4 are removed.

Council Name	Feedback	LVIA Response
	<p>PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms:</p> <p>C. Moderate adverse Y1. Moderate adverse Y15 Minor neutral D. No effect</p> <p>CNLB comments: Rural road between Sherston and Alderton on the boundary of the Cotswold National Landscape. At the southern end of the road there are views south towards the church at Alderton beyond large arable fields punctuated by mature trees.</p> <p>We agree that receptor value should be high and susceptibility is medium, resulting in a high-medium sensitivity.</p> <p>Although no panels are proposed in field C1, fields C2, C3 and potentially C4 would be visible and due to the rising topography of these fields and elevated position of the viewpoint around Widleys Farm, we consider that mitigation planting would have a limited effect in screening the panels. Remove all panels from fields C2, C3 and C4 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>We agree that there would be a significant adverse effect at construction and year 1.</p> <p>We also consider that it may be possible on the stretch by Widleys Farm to see both Lime Down A and Lime Down C, resulting in a degree of cumulative effect.</p> <p>CNLB Recommendations: Remove all panels from fields C2, C3 and C4 on the northern side of the ridge running through the field or</p>	

Council Name	Feedback	LVIA Response
	in areas where skyline effects would be apparent and identify these fields for habitat enhancement."	
Cotswolds National Landscape	<p>"Lime Down C</p> <p>Receptor: TR039The Avenue, Alderton</p> <p>PVP: 26</p> <p>PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA terms:</p> <p>C. Moderate/minor adverse</p> <p>Y1. Moderate/minor adverse</p> <p>Y15 Minor neutral</p> <p>D. No effect</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 where skyline effects would be apparent and identify these fields for habitat enhancement."</p>	Further assessment and visualisation work has been undertaken and shared with CNL and WC testing potential visibility of panels in C6.
Cotswolds National Landscape	<p>"Lime Down CReceptor: TR038 Alderton Road, LuckingtonPVP: 25PEIR assessed visual effect at Construction (C)/Y1/Y15/Decommissioning (D). Bold denotes a significant effect in EIA</p>	Further assessment and visualisation work has been undertaken and shared with CNL

Council Name	Feedback	LVIA Response
	<p>terms: C. Moderate adverse Y1. Moderate adverse Y15 Minor neutral D. No effect</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. We agree that there would be a significant adverse effect at construction and year 1. 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>and WC testing potential visibility of panels in C6, C7 and C9.</p>
Cotswolds National Landscape	<p>"Enhancement</p> <p>The Board welcomes the mention of 'Enhancement Measures' outlined at paragraphs 8.8.12 and 8.8.13 and the applicant's intention that "Consultation with the Cotswold National Landscape Board to further the purpose of the national landscape is ongoing. Detailed proposals will be considered further as the design evolves and will be incorporated into the developing Environmental Landscape Masterplan for the DCO Application".</p> <p>Policy CE7.1 of the CNL Management Plan referenced above states that biodiversity (including the abundance of wildlife) in the Cotswolds National Landscape should be conserved and enhanced by establishing a coherent and resilient nature recovery network across the Cotswolds National Landscape and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and focus on the priority species and habitats listed in Appendix 7.</p> <p>Para 4.35 of GLVIA 3 provides the following definition of enhancement: 'Proposals that seek to improve the landscape</p>	<p>Cotswolds Nature Recovery Plan and focus on the priority species and habitats listed in Appendix 7.</p> <p>The Scheme has been delivered through an iterative design approach alongside the project ecologist to achieve this.</p>

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	<p>resource and visual amenity of the proposed development site and its wider setting, over and above its baseline condition' (N.B. Underlining for emphasis). As such the Board considers that 'enhancement' provided by the scheme should be separate from, and additional to, embedded mitigation measures to ensure that the natural beauty of the CNL (including views from the CNL) would be left in a better state as a result of the development than the pre-development baseline.</p> <p>The Board's Officers are happy to continue liaising with the Applicant's technical consultants in the development of detailed enhancement measures which will further the purpose of CNL designation and strengthen local biodiversity networks to support nature recovery as part of the iterative design process."</p>	
Cotswolds National Landscape	<p>"NOTES:</p> <ol style="list-style-type: none"> 1. The name used for the organisation associated with the AONB designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape Board or The Board. The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances. 2. Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture. 3. Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. https://www.legislation.gov.uk/ukpga/2023/55/enacted 4. The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections <ol style="list-style-type: none"> a. Cotswolds National Landscape (CNL) Management Plan 2023-2025 	Comment noted.

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	www.cotswoldsaonb.org.uk/management-plan b. Cotswolds AONB Landscape Character Assessment www.cotswoldsaonb.org.uk/lca c. Cotswolds AONB Landscape Strategy and Guidelines www.cotswoldsaonb.org.uk/lsg d. Cotswolds AONB Local Distinctiveness and Landscape Change www.cotswoldsaonb.org.uk/ldlc e. Cotswolds National Landscape Board Position Statements www.cotswoldsaonb.org.uk/ps1 www.cotswoldsaonb.org.uk/ps2 5. Section 85 of the Countryside and Rights of Way Act 2000. www.legislation.gov.uk/ukpga/2000/37/section/8	
Cotswolds National Landscape	<p>"APPENDIX 1: THE STATUTORY DUTY ON RELEVANT AUTHORITIES TO SEEK TO FURTHER THE STATUTORY PURPOSE OF THE COTSWOLDS NATIONAL LANDSCAPE, SECTION 245 OF THE LEVELLING UP AND REGENERATION ACT 2023</p> <p>Section 245 of the Levelling Up and Regeneration Act 2023¹(LURA) introduced a statutory duty on relevant authorities²to seek to further the statutory purposes of protected landscapes³ (the 'seek to further' duty). With regards to National Landscapes, this requirement has been incorporated into Section 85 of the Countryside and Rights of Way (CROW) Act 2000, which now states:</p> <ul style="list-style-type: none"> • In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. <p>This replaces the previous version of Section 85 of the CROW Act, which required relevant authorities to have regard to the statutory purpose of national landscape designations (the 'duty of regard').</p>	Comment noted.

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	<p>Section 245 of the LURA and Section 85 of the CROW Act also state that 'the Secretary of State may by regulations make provision about how a relevant authority is to comply with the duty'. These regulations are likely to be enacted during the lifetime of this iteration of the CNL Management Plan. However, the application of the duty is not dependent on these regulations.</p> <p>The 'seek to further' duty is in force now, as it has been since 26 December 2023, and must be complied with."</p>	
Cotswolds National Landscape	"Guidance and advice Guidance on the 'seek to further' duty has been published by Defra ⁵ and the National Landscapes Association ⁶ . In addition, Natural England has provided advice on the 'seek to further' duty in relation to a nationally significant infrastructure project ⁷ and the Campaign for National Parks has obtained a legal opinion on the duty ⁸ . Other useful reference points include the Government's explanatory note on the Lords' amendments to the Levelling Up and Regeneration Bill ⁹ and the Government's LURA press release ¹⁰ . This appendix pulls together key aspects of this guidance and advice, as outlined below (with references being provided for the relevant guidance / advice), in order to provide a coherent narrative."	Comment noted.
Cotswolds National Landscape	"Strengthened duty The 'seek to further' duty is a strengthened duty compared to the previous 'duty of regard'. ¹¹ If 'have regard to' was the same as 'seek to further', then there would be no need for the amendment. ¹² The duty is therefore clearly intended to impose new and more onerous requirements with respect to the statutory purposes than existed before. ¹³ "	Comment noted.
Cotswolds National Landscape	"Outcome focussed The 'seek to further' duty is intended to facilitate better outcomes for National Landscapes, which are in line with their statutory purpose (i.e. to conserve and enhance their natural beauty). ¹⁴ As stated in the Government's LURA press release, the duty 'will enhance our national network of beautiful, nature-rich protected	Comment noted.

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	landscapes that can be enjoyed right across the country'. ¹⁵ In this context, natural beauty should be considered in its holistic sense and 'conserve and enhance' should be treated as a singular purpose. ^{16,17} "	
Cotswolds National Landscape	"Active / pro-active duty The 'seek to further' duty is an active duty, not a passive one. ¹⁸ This means that the duty should be proactively considered when exercising or performing any functions to which the duty applies. ¹⁹ For example, a relevant authority must factor in the duty before the adoption of a proposed policy and not merely as a 'rearguard action' following a concluded decision. ²⁰ Relevant authorities would be well-advised not treat the new duty as 'business as usual'. ²¹ 'Seek' and 'further' both imply demonstrable action in the form of assistance and promotion of the statutory purpose of conserving and enhancing natural beauty of National Landscapes. It is not enough that a decision simply does not conflict with that purpose: it must seek to further it. ²² "	Comment noted.
Cotswolds National Landscape	"Reasonable and proportionate A relevant authority should take all reasonable and proportionate steps to explore how the statutory purpose of conserving and enhancing the natural beauty of National Landscapes can be furthered. ²³ "	Comment noted.
Cotswolds National Landscape	"Going beyond avoidance and mitigation of harm As far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to conserving and enhancing of the natural beauty of National Landscapes. ²⁴ 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. ²⁵ Consideration should be given to the appropriateness of compensation measures. ²⁶ "	Comment noted.

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Cotswolds National Landscape	<p>"The setting of National Landscapes</p> <p>As well as being applied within National Landscapes, the 'seek to further duty' also applies to functions undertaken outside of the designation boundary which affects land within a National Landscape.²⁷</p> <p>Management Plans</p> <p>When seeking to further the purpose of conserving and enhancing natural beauty, relevant authorities should consider the information contained in a National Landscape's Management Plan.²⁸ Relevant authorities should make efforts to understand the Management Plan and relate their functions to it.²⁹ Conserving and enhancing the natural beauty of the specific National Landscape will normally mean, as a minimum:</p> <ul style="list-style-type: none"> • conserving and enhancing the character components or special qualities identified in the Management Plan; • supporting the Management Plan Objectives, Policies and/or Principles (as applicable) as set out for each of these; and • following any Management Plan actions set out for each.³⁰ <p>Consideration should also be given to whether the measures being taken by the relevant authority align with and help to deliver the targets in the Management Plan.³¹"</p>	Comment noted.
Cotswolds National Landscape	<p>"Protected Landscapes Targets and Outcomes Framework</p> <p>Relevant authorities should refer to the Protected Landscapes Targets and Outcome Framework.³²</p> <p>Dialogue with the National Landscapes team</p> <p>Dialogue with the National Landscape team can assist the relevant authority³³ (i.e. in this instance, dialogue with the Cotswolds National Landscape Board).</p>	Comment noted.

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	<p>Scenarios where there would be a neutral effect on the purpose of conserving and enhancing natural beauty</p> <p>If the measures taken by a relevant authority, in relation to the 'seek to further' duty, would have a neutral effect on the purpose of conserving and enhancing natural beauty, consideration should be given to what modifications would help to further this purpose.³⁴</p> <p>Scenarios where a relevant authority concludes that their decision / action would not seek to further the purpose of conserving and enhancing natural beauty If, having considered the implications of a decision, a relevant authority reaches the view that the decision does not 'seek to further' the purpose of conserving and enhancing natural beauty, it would be hard to argue that the decision would, in fact, be open to the relevant authority. This is because it would appear to be in breach of the duty. In those circumstances, the decision would need to either be withdrawn or modified such that the relevant authority could confidently say that it did seek to further the relevant purpose. ³⁶"</p>	
Cotswolds National Landscape	<p>"Scenarios where the natural beauty of a National Landscape would not be conserved and enhanced</p> <p>The 'seek to further' duty does not preclude decisions that are 'net harmful' to the natural beauty of a National Landscape. If that were so, the duty would be to 'further the purpose' rather than to 'seek to further the purpose'. 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.³⁶</p> <p>Evidence</p> <p>A relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence that they have</p>	Comment noted.

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	<p>complied with the 'seek to further' duty. This evidence should include the measures that have been taken, or to which consideration has been given, to further the statutory purpose of conserving and enhancing the natural beauty of National Landscapes.³⁷ If it is not practicable or feasible to take measures to further this purpose, the relevant authority should provide evidence to show why it is not practicable or feasible.³⁸</p> <p>Monitoring and Compliance</p> <p>A relevant authority may consider it appropriate to instigate a formal compliance monitoring and reporting system to ensure adherence to the duty.³⁹</p> <p>Potential errors in law</p> <p>A failure to consider the 'seek to further' duty, or a failure to understand its pro-active and mandatory nature, would be an error of law.^{40,41} If a relevant authority makes a decision that engages the duty and it cannot demonstrate that it has done all it reasonably can to further the statutory purpose of conserving and enhancing natural beauty as part of the decision, that decision will be open to legal challenge.⁴² If a relevant authority applies the principles that are set out in this appendix conscientiously, it will be less open to a judicial review challenge on the basis of an alleged breach of the new duties.⁴"</p>	
Natural England	<p>"Nationally Designated Landscapes Cotswolds National Landscape Natural England notes that the proposed development is located within the setting of the Cotswolds National Landscape (defined in legislation as an Area of Outstanding Natural Beauty). Please note that Natural England provides advice on the landscape impacts of NSIP proposals on designated landscapes. On wider landscape issues applicants should obtain advice from local planning authorities and other local bodies. We welcome the work that has been undertaken to date to assess the potential landscape</p>	<p>Comments noted. ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [EN010168/APP/6.3] is included in the ES. The ES includes a 'cumulative' assessment of all elements of the development including at all stages of the development (construction, operation and decommissioning) on the solar array,</p>

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	<p>and visual impacts resulting from the proposed development. We note that a specific assessment of the potential effects on the Cotswolds National Landscape has not been included in the PEIR but consideration of these effects has informed the development and a full assessment will be provided in the Environmental Statement. The assessment must consider landscape and visual impacts on the National Landscape in addition to its setting and specific assessment of the potential effects of the scheme on the special qualities of the National Landscape. The assessment must consider the cumulative effects of all elements of the development and an assessment of the effects of the proposed development in combination with other relevant developments. This should include an assessment of the potential impact of construction activity on the tranquillity of the National Landscape which does not appear to be considered in the PEIR. These assessments are required before a conclusion can be reached on the significance of impacts on the Cotswolds National Landscape. Whilst noting that PEIR is based on summer photography, therefore representing a best-case scenario of visibility between the National Landscape and the proposed development, the work undertaken to date indicates that the topography of the land and existing vegetation limits the visual connection between the development site and the National Landscape. Based on the information presented in the PEIR, it is feasible that provided sufficient avoidance and mitigation measures are included in the design and layout of the proposed development, a significant adverse effect on the National Landscape can be avoided."</p>	<p>the cable route corridor and transport effects. The Assessment is based on summer and winter photography representing the worst case scenario.</p>
Natural England	<p>"There are a number of areas in close proximity to the National Landscape where the current extent of proposed panels are likely to be visible and could negatively affect the special qualities of the National Landscape.</p> <p>The northern extent of Lime Down A is directly adjacent to the National Landscape. The indicative site layout shows panels will be located in fields directly adjacent to the National Landscape</p>	<p>Infrastructure in A11 and 12 have been removed from the scheme and are instead used for positive landscape and ecological enhancement within the setting of the CNL.</p>

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	boundary. Viewpoint photography provided in the PEIR indicates that these areas will be visible from within the National Landscape, it is therefore recommended that panels are removed from the fields adjacent to the National Landscape to reduce the effect. These fields should be used for landscape and ecological enhancements."	
Natural England	"Further areas of Lime Down C are visible from the National Landscape and footpaths extending from the National Landscape to the wider countryside. The topography of Lime Down C makes it a more sensitive part of the site with panels in this area more likely to have adverse landscape and visual effects."	Parcels C2, C3 and C4 have been removed from the scheme in recognition that the topography makes this area of Lime Down C more sensitive. Parcel C1 and C6, on the edge of the CNL remain within the scheme and are used for positive enhancement within the setting of the CNL.
Natural England	Viewpoints 30 and 31 demonstrate that proposed panels in fields on the northern extent of Lime Down C are visible from a footpath within and within the setting of the National Landscape. It is therefore recommended that the extent of panels within Lime Down C is reviewed to avoid adverse landscape and visual effects on the National Landscape. Where panel areas are reduced, this should be used to provide landscape and ecological enhancements. Due to the importance of this area to lesser horseshoe bats as discussed above there will likely be opportunities to integrate landscape enhancements with habitat enhancements for lesser horseshoe bats.	As noted above, Parcels C2, C3 and C4 have been removed from the scheme as any infrastructure within these fields would be highly visible from VP 30 and 31 within the setting of the CNL. Parcel C1 and C6, on the edge of the CNL remain within the scheme and have been used for positive enhancement within the setting of the CNL including habitat enhancement for lesser horseshoe bats.
Natural England	We welcome that the PEIR recognises that Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but impacting on its natural beauty. We welcome that the applicant will consult with the Cotswolds National Landscape board on proposals which will be included in	Comments noted. Positive enhancements measures noted above seek to further the statutory purposes of the area. Consultation with the Cotswolds National Landscape board is ongoing.

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	the DCO application to further the purposes of the National Landscape.	
Wiltshire Council	14.19 The council notes that the position of HULL23 (Figure 8 below [see page 69 of Technical Response PDF for Figure 8]) on the ground appears to be different to the Definitive Map line. The council's PROW officer suspects that the sign-post is about 60m to the south of where it should be. However, it is noted that the indicative Site Layout Plan appears to show the footpath in the correct position.	The Applicant confirms that the Scheme design for DCO submission reflects feasible and practicable outcomes from discussions held with WC and the respective landowners on the Scheme to incorporate network improvements. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the Works Plan [EN010168/APP/2.3] and shown on ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] . At present the Applicant is only able to commit to permissive paths and routes, due to the temporary (albeit long-term) nature of the Scheme as applied for within the Draft DCO [EN010168/APP/3.1] and the associated land agreements in place. This has been communicated with Wiltshire Council who understand this position. The Applicant however does not discount the opportunity for this position to be revised in coordination with the future operators, landowners, and WC once the Scheme has been commissioned and operational for some time.
Sherston Parish Council	"Q11. Please provide any comments you have on our assessment of the potential effects construction, operation and decommissioning of the Project and an underground cable connecting it to Melksham Substation could have, and the measures we are proposing to mitigate those impacts.	A Development Consent Order (DCO) includes a requirement to decommission the project in accordance with a detailed decommissioning statement that must be approved by the local planning authority prior to decommissioning. Failure to comply

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	<p>RESPONSE:- This development poses significant risks to our community for two generations, over a period of 60 years, until 2090.</p> <p>Currently, there is no enforceable mechanism to ensure the developers remove the solar panels and infrastructure at the end of the project's life. This raises serious concerns about who will bear the cost of decommissioning and restoring the land –potentially leaving the burden on local communities or taxpayers. Some of the comments made by Limedown during the consultation indicated that much of the infrastructure may be left behind and simply decommissioned – what are the risks and long term impacts of this?</p> <p>What will happen to the land following decommissioning - how will lands be returned to former use (to be farmed?) given that the land will be presumably subject to change of use in order for the Solar Park to go ahead, how will the risk be mitigated to avoid renewed planning permission for the site for a new alternative industrial development on what will now be an industrial site. We would like to see the land returned to its former agricultural state following the 60 year period and automatically re-categorised as agricultural land on termination of the lease.</p> <p>How will the scheme be monitored over its lifetime in such a way that there are funds available for the actual decommissioning? How can we be sure that the companies involved will be in existence/solvent to carry out this process? Money (an amount at least equal to the construction costs) must be set aside to ensure that someone is available to return the site to its original setting.</p> <p>The construction period will require the movement of significantly large pieces of infrastructure (not just solar panels, but also containers (bigger than standard shipping containers), major parts for electricity sub-stations and cabling. The proposed routes to the</p>	<p>with the requirements of a DCO is a criminal offence, while the costs of any enforcement action can also be recovered from the operator under the Planning Act 2008. Further details on how the Scheme will be decommissioned are available in Outline Decommissioning Strategy [EN010168/APP/7.14].</p> <p>The Outline Decommissioning Strategy [EN010168/APP/7.14] will be developed into a detailed Decommissioning Strategy post DCO consent and agreed with Wiltshire Council. The detailed Decommissioning Strategy would ensure that decommissioning was undertaken safely and with regard to the environmental legislation at the time of decommissioning. The detailed Decommissioning Strategy would also set out any relevant monitoring to be undertaken.</p> <p>The only infrastructure that may be left in situ upon decommissioning (dependent on best practice guidance available at the time) are the Interconnecting Cables and Grid Connection Cables. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities, however, should guidance at the time suggest they need to be removed then this will be followed.</p>

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	project site will be totally inadequate to allow large vehicles to gain access, with serious inconvenience to local road-users and safety risks to vulnerable road users. For example the road from Grittleton to the Fosse way has a number of 90 degree bends which a HGV would struggle to navigate. The impact on roads that are already in a poor state could be disastrous. "	
Malmesbury Town Council	"Proposed Objection – Lime Down Solar Park“Malmesbury Town Council is committed to a sustainable future for our town and surrounding area. We have worked extensively with a range of interested parties, including home builders and developers, to ensure sustainability is a key consideration in the development and growth of our town. This has included specific measures, including EV and Solar inclusion for new development. Whilst the above demonstrates our support for the principal of renewable energy, including solar, it is not a blanket approval. In the case of significant solar development, Lime Down Solar Park, this committee strongly opposes the development in principle, as well as several mechanisms around the consultation process. At 11 Square Miles, Lime Down is a significant development which will have a negative, material impact on both the immediate and surrounding areas, including Malmesbury. We share the concerns of Wiltshire Council relating to the sites current Agricultural Status (30% of which is significantly favourable and versatile arable land), impact on the cherished AONB status of the area and far ranging impact on land health. There is a statutory duty to conserve and enhance national landscapes and this development contradicts this principle."	The applicant notes this comment. The red line boundary of the Scheme contains large areas set aside for mitigation where panels are not proposed. Although the Site is not within the CNL (AONB), it is recognised that Sites A, B and C are within the setting of the CNL. The scheme has been informed by the Mitigation Hierarchy to prevent/ avoid, mitigate and restore and enhance to avoid significant adverse impacts on the CNL's landscape and visual character and quality.
Sherston Parish Council	"Q4: Please provide any overall comments you have on our proposals for Lime Down Solar Park. You may choose to expand on your answer to Question 3 (the topic areas most important to you which you would like us to consider). RESPONSE:- The very large size and location of the proposed development is totally inappropriate. It will be one of the largest in the country adding to the very many sites already located in Wiltshire and neighbouring Counties – we have asked on several	Due to the dispersed nature of the Sites A-E which make up the Scheme there is limited intervisibility between the Sites. The visual impact of the Scheme is fully assessed in the LVIA which includes an assessment of effects on residential properties. Refer to ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].

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	<p>occasions for a view of the number of facilities already located in Wiltshire and neighbouring counties, however this question has yet to be responded to. The visual impact of such a huge industrial solar farm would fundamentally change the tranquil character and enjoyment of the area. The impact to residents both during construction and operation will be significant in terms of day to day life. This impact will also extend to the local economy with local businesses currently benefitting from walkers/ramblers, cyclists and tourists visiting and spending their hard earned cash.</p> <p>We firmly believe that solar farms should be appropriately located on already industrialised land, on existing and new build roof tops or adjacent to motorways and existing trainlines not on productive agricultural land. Equally there are many unused airfield around the country which surely would be a much better location, causing minimal impact to local residents, ecology, biodiversity etc. This development poses significant risks to our community for two generations, over a period of 60 years, until 2090. We do not believe that there are sufficient provisions to enforce the removal of the solar panels and infrastructure at the end of the project's life. This raises serious concerns about who will bear the cost of decommissioning and restoring the land – potentially leaving the burden on local communities or taxpayers</p> <p>Cost of housing impact – we previously provided detail from local estate agents as part of our response to the 1st consultation in relation to the impact on house prices in the local area. This impact continues and is a general concern for residents in the area. It can only be assumed that this impact will continue should the proposal go ahead."</p>	<p>Opportunities to locate Solar PV Panels on previously developed land (PDL)/brownfield land, contaminated land, industrial land and commercial rooftops were explored in the counties of Wiltshire, South Gloucestershire, Bath and North East Somerset and Somerset. However, none of the sites were large enough to provide a viable land parcel of at least 40 ha to facilitate a large scale NSIP project over 50 MW. More information regarding how the site was selected can be found in ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] and ES Volume 3, Appendix 4-2: Site Selection Report [EN010168/APP/6.3].</p> <p>There is no evidence to suggest that solar developments have a long-term impact on house prices. It is often the case that any new proposed development—whether housing, pipelines, roads, or electricity transmission—introduces a degree of uncertainty within communities during the planning and construction phases. This can sometimes result in a temporary dip in house prices, but they typically stabilise once the development is completed.</p>
Wiltshire Council	<p>"Chapter 2 (The Development Area): 7.6. The description of the development area included within Chapter 2 (The Development Area) outlines the maximum extents of the land required for the construction, operation maintenance and decommissioning phases of the scheme further illustrated by</p>	<p>Comment noted.</p>

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	maps included in Volume 2, Figure 1-2 (Development Area) and Volume 2, Figure 2-1 (Elements of the Site). The council considers that the information is sufficient to inform the landscape and visual assessment of the scheme, noting that further refinement of Development Areas will follow as the detailed design is further refined and EIA progresses. "	
Wiltshire Council	<p>"n) The exact nature and location of screening mitigation associated with the solar photovoltaic panels, BESS and substations.</p> <p>o) Full and complete details of all security fencing to be erected.</p> <p>p) Final details of the physicality of the solar panels, as well as the location and external appearance of all supporting ancillary buildings as well as the BESS containers. Precise details of the mentioned fire mitigation measures and water supply in relation to the BESS should also be provided (as part of an Outline Battery Safety Management Plan)."</p>	<p>Plans of the screening mitigation and fencing have been provided in ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [EN010168/APP/6.2].</p> <p>Plans showing the details of the solar panels have been provided in ES Volume 2, Figure 2-1 Elements of the Site [EN010168/APP/6.2]. Specific elements regarding the dimensions and physicality of the panels and BESS are discussed in ES Volume1, Chapter 3: The Scheme [EN010168/APP/6.1].</p> <p>An Outline Battery Safety Management Plan (BSMP) has been produced and is available in Volume 7 of the DCO [EN010168/APP/7.21].</p>
Hullavington Parish Council	<p>"• It is appreciated that an Outline Battery Safety Management Plan is referenced within the documents and is to be submitted with the DCO. In the absence of such a document at this stage, HPC is concerned not only about the siting of the original BESS within the setting of the grade1 listed Bradfield Manor but is now equally concerned with the proposed location of the second, but smaller BESS within area D on Down Lane. This second location is bounded by public rights of way (Hull6, Hull7 and Hull8) yet no viewpoint picks up the effects of this proposed installation in this location. Further viewpoints (41A and B?) should now be considered part way along PROWs Hull7 (the Palladian Way) and</p>	<p>Representative viewpoint photography has been agreed with Wiltshire County Council. The LVIA assesses the effects of the scheme (including the BESS) from public rights of way (Hull6, Hull7 and Hull8). Refer to ES volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1].</p> <p>The Applicant notes this comment. The key safety objectives of the indicative site design planning, Outline Battery Safety</p>

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	HULL8 (following the ridge) so that this potential installation can be adequately assessed for visual and landscape impact along with new impacts from the medium range viewpoints VP 40, 43 and 46."	Management Plan (BSMP) [EN010168/APP/7.21] and ES Volume 2, Appendix 15-2 BESS Fire Emissions Modelling [EN010168/APP/6.3] that have been submitted for the Scheme are to: <ul style="list-style-type: none"> • To minimise the likelihood of an event. This is an overriding priority. • To minimise the consequences should an event occur. • To restrict any event to the BESS site and minimise any impact on the surrounding areas. • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community.
Christian Malford Parish Council	<p>"Christian Malford Parish Council view this proposal as speculative proposal rather than a sustainable development to provide renewable energy.</p> <p>We have significant concerns in the following areas: Impact on landscape, Wiltshire County Council (WCC) prepared a landscape sensitivity analysis in March 2023. In the areas highlighted for development (Sherston, Hullavington et al), the report identified significant landscape impacts for solar farms of up to 120ha in size, Lime Down is c850ha, therefore there will be more than a significant impact on the landscape.</p> <p>A lot of parishioners visit the Cotswold to walk and cycle the Fosse Way, Wessex and other footpaths and bridleways. These will either be destroyed or be routed through an industrial landscape, reducing those who want to visit and having a major impact on the tourism income of the area.</p> <p>As a rural community with many farms, we are concerned about</p>	<p>The applicant notes this comment. Reference to the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment is included in the ES.</p> <p>The study assesses the sensitivity of the Wiltshire Landscape Character Areas/ Types to different types and scales of Renewable Energy rather than impacts. Due to the dispersed nature of the Sites A-E which make up the Scheme there is limited intervisibility between the Sites. The LVIA includes an assessment on all footpaths and bridleways and the Cumulative Visual Assessment assess sequential views from publicised routes such as the Fosse Way.</p>

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	loosing farmland and the associated food production. The proposed site is comprised of 30% best quality farmland (255ha). Given our reliance on imported food, the loss of this land presents irreversible damage to the sustainability of food production in the UK."	
Wiltshire Council	15. Following assessment of the proposals, Wiltshire Council objects to the proposal based on significant concerns that have been raised about the potential demonstrable harm that the development will have upon matters such as landscape and visual impact, ecology and biodiversity, heritage and flooding. The extent to which these impacts can be mitigated is unclear at this stage. However, this is expected to be challenging given the scheme's significant scale (area, height etc.), the duration of the construction phase and the disruption to local residents. Whilst it is acknowledged that there are some environmental and economic benefits, based upon the information submitted, these are outweighed by the anticipated harm in this rural countryside setting.	<p>The scale of development within the red line boundary has significantly reduced from the layout assessed at PEIR as part of the iterative design process and response to consultation.</p> <p>Regarding landscape and visual impacts the LVIA has assessed all identified landscape and visual receptors and has identified where significant effects occur. The Scheme has significantly reduced from the layout assessed at PEIR in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. Specific mitigation measures and enhancement plans are included in the ES. The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and the Outline Landscape and Ecological Management Plan (OLEMP) [EN010168/APP/7.18].</p>
Wiltshire Council	"7.40. It is acknowledged that some field areas initially proposed as solar panel infrastructure areas have been removed or reduced in extent from the scheme where these were assessed to result in potential for likely significant adverse visual effects for sensitive visual receptors. The removal of these areas following iterative landscape and visual assessment is welcomed in landscape and	The majority of fields removed from the Scheme to avoid harm to landscape/visual receptors, especially on the edge of the CNL or where there is buried archaeology, remain within the Scheme and are proposed for onsite mitigation and/or

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	visual terms, noting that some other field areas are similarly removed to safeguard identified settings to heritage assets (such as opposite Fosse Lodge in Lime Down C) or to provide ecology mitigation / net gain areas or to avoid sensitive buried archaeology. These removed field areas, as based on current indicative layouts, are understood to remain within the project site area and will provide onsite mitigation or additional enhancement opportunities for ecology / Biodiversity Net Gain (BNG)."	positive enhancement areas for landscape, ecology / Biodiversity Net Gain (BNG).
Wiltshire Council	<ul style="list-style-type: none"> • The reinstatement of missing and lost hedgerow trees is considered an important enhancement opportunity to help conserve and enhance landscape character and leave a positive landscape legacy from the project. (The reintroduction of disease resistant varieties of hedgerow Elm trees into this landscape could be supported). • Restore missing and enhance the existing species and age diversity of hedgerow trees and field trees present in the landscape. It is acknowledged that many hedgerow trees have been lost from the landscape / field pattern over the last 50 years, primarily resulting from Dutch Elm Disease (1970's) and more recently and ongoing from Ash Die Back. English Oak comprises the highest percentage of the remaining hedgerow and field trees in this area of Wiltshire, and it can be observed that many of these trees are of a similar mature age. Oak trees are high water demand trees and could be at increased risk of drought stress with longer drier summers arising from climate change. Taking this into account, a successive approach to selection of trees to grow on as hedgerow trees or planting new trees could be adopted over the life of the project might be adopted. i.e. not all provided up front, with potentially a second phase after 30 years and another phase prior to decommissioning. 	Specific mitigation measures and enhancement plans are included in the ES. The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] .
Wiltshire Council	<ul style="list-style-type: none"> • Reinstatement of historic hedge lines / former field patterns. • Improve and enhance existing hedgerow structure. Lay overgrown hedgerows and improve species diversity of woody hedgerow species, with supplementary planting to increase ecological value and nature recovery. 	Specific mitigation measures and enhancement plans are included in the ES. The Landscape and Ecological Mitigation Plan (LEMP) provides details of the proposed mitigation and enhancement

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		which are described in Section 9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] and the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] .
Wiltshire Council	b) A detailed Landscape and Ecological Management Plan (LEMP).	A Landscape and Ecological Mitigation Plan (LEMP) is included as part of the DCO Application. Refer to Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] .
Wiltshire Council	"7.15. The council's Landscape Officer has been unable to find any justification within the submitted PEIR information to explain the justification for the Zol for cumulative Landscape and Visual topic area, including within Volume 3 – Appendix 8-1 Landscape and Visual Impact Assessment (LVIA) Methodology, where it simply states at para, 2.5.1 that 'The Cumulative landscape and visual effects relating to the Cumulative Developments are considered as part of this LVIA cumulative assessment. Cumulative Effects relating to other similar developments (Cumulative Developments) are considered within the Cumulative Developments assessment.' Further detail or explanation should be provided in relation to the Landscape and Visual assessment methodology used in the assessment of 'cumulative schemes' and 'cumulative developments' alongside justification for establishing the Landscape and Visual cumulative development Zol (this is discussed in further detail under comments for Chapter 21 (Cumulative and In-Combination Effects)). It is considered that the applicant should provide this additional information, if it exists, signpost it more clearly."	ES Volume 3, Appendix 8.1: LVIA Methodology [EN010168/APP/6.3] provides a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas. Additional mapping has been included in the LVIA to show existing solar schemes, the proposed LD Sites and Cumulative Sites within the Study Areas and the Landscape Character Areas.
Wiltshire Council	"7.16. In the council's Landscape Officer's opinion, the methodology and basis of the current cumulative landscape and visual assessment is not clear. At this preliminary stage, the submitted information doesn't appear to consider within its scope the most relevant type of cumulative effect associated with the	The applicant notes this comment.

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	introduction of large-scale solar development and associated infrastructure over existing farmland, providing a rural separating function and setting to Wiltshire's characteristic limestone villages, and which provides countryside recreation and amenity functions for their associated communities. "	
Wiltshire Council	<p>"7.17. Paragraph 7.17 of the third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) explains there are many different types of cumulative landscape and visual effects that may need to be considered and lists seven different types of cumulative effect that could be relevant to include. In the council's Landscape Officer's opinion, the two most relevant of these seven bullet points to include from the guidelines are (underline added for emphasis):</p> <ul style="list-style-type: none"> • The filling of an area with either the same or different types of development over time, such that it may be judged to have substantially altered the landscape resource and views or visual amenity. • Incremental change as a result of successive individual developments such that the combined landscape and / or visual effect is significant even though the individual effects may not be; <p>7.18. Paragraph 7.18 of the GLVIA3 states that: "Agreement should also be reached about whether the cumulative effects assessment is to focus primarily on the additional effects of the main project under consideration, or on the combined effects of all the past, present and future proposals together with the new project."</p> <p>7.19. It is considered that due to the large expanses of land that these types of development occupy, and the obvious magnitude of change to landcover and land use, there is a proportionate justification in this regard to follow the 'combined' effects approach, as it is felt that stakeholders, including the public will likely be more interested to understand the combined effects of all the past, current and future proposals, including the proposed scheme."</p>	<p>ES Volume 3, Appendix 8.1: LVIA Methodology [EN010168/APP/6.3] defines the difference between the assessment of Cumulative Sites (Site's A-E and the cable corridor- The Scheme) and Cumulative Developments (other similar solar projects) at para 2.3.4 and 2.3.5 respectively.</p> <p>The Cumulative Assessment has assessed the Scheme effects in combination with the Cumulative Developments and existing solar schemes (identified in the baseline).</p>
Atworth Parish Council	"Hello,	The purpose of the EIA process is to make sure that where significant effects are

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	<p>Atworth Parish Council attended the presentation made at Shaw School on 26th February.</p> <p>The council understand the government's desire to increase production of clean energy, and have approved the plans for one large renewable development in the village.</p> <p>We do though believe that proper consideration of planning principles should apply to help us to ensure that developments are of the right size in the right place.</p> <p>We have the following further concerns;</p> <ul style="list-style-type: none"> - Despite the changes made to the Lime Down plans, it is difficult to see how an industrial development over 4 metres in height including batteries and infrastructure spread over 2,170 acres of a predominantly agricultural rural setting will not fundamentally change the character of that landscape. - The plans claim to minimize the impact on heritage assets but given the proximity to so many, it is also difficult to see how that can be achieved, and any impact is not acceptable. - Disturbing the hedgerows, wildlife and habitats over an area that size will have a lasting impact on ecology. - There remains no detailed assessment of the impacts of noise and risks associated with fire from over 400 acres of BESS and infrastructure. It is vital that mitigation of fire risks are fully considered at an early stage. - Access routes are unsuitable for a development of this type. - Impact on our parishioners on the grid connection is impossible to properly assess from the plans submitted as they lack detail. 	<p>identified, the Scheme puts in place measures to reduce negative impacts, while also seeking to enhance positive effects. The Applicant is confident that the assessments provided in the ES are thorough and have properly considered all impacts. The Applicant notes that detailed assessments are available for the topic areas mentioned in the comment at the following locations:</p> <p>ES Chapter 8: Landscape and visual [EN010168/APP/6.1]; ES Chapter 12: Cultural Heritage [EN010168/APP/6.1]; ES Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]; ES Chapter 13: Transport and Access [EN010168/APP/6.1]; ES Chapter 14: Noise and Vibration [EN010168/APP/6.1]; ES Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [EN010168/APP/6.1] and Outline Battery Safety Management Plan [EN010168/APP/7.21].</p> <p>The Applicant appreciates that these chapters contain a high level of detail. A non-technical summary of the conclusions of these assessments can be found in ES Volume 6.4, Non-Technical Summary [EN010168/APP/6.4].</p>

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	- Please acknowledge receipt of these comments."	
Easton Grey Parish Council	"Easton GreyThe core of the Easton Grey Parish is a Conservation Area and almost the entirety of the Parish lies within the Cotswold AONB/Natural Landscape. This is not apparent from the Plan or the Project Information Booklet.The village includes an ancient monument in its bridge over the River Avon at the centre of the village.Easton Grey and the area of the Lime Down project are within the Cotswolds which is known internationally for its history and beauty.As a rural area we rely in no small way on tourism and agriculture for employment. The former is very much reliant on maintaining the beauty of the area with uninterrupted views and historic walks.As a community we do not object to renewable energy. However, in the case of solar it should and can be placed within the existing built environment or brownfield sites and nearer to the grid connection to avoid a long and as yet unspecified cable to Melksham and not on BMV land or areas of archaeological or historical significance."	Comment noted.
Luckington and Alderton Parish Council	Specifically, the 'Lime Down Solar Park Scheme' fails to adequately address and mitigate the impact of its large-scale nature on the local environment, adjacent Cotswold Natural Landscape (formerly ANOB) and inadequate local roads and infrastructure.	The applicant notes this comment. An LVIA has assessed the effects of proposed scheme on the local environment, ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] . The LVIA includes a full assessment of effects on the special qualities of the adjacent Cotswold Natural Landscape in ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3] .
Luckington and Alderton Parish Council	The PEIR offers only vague and incomplete plans regarding the 'Landscape and Visual' elements of the proposed Lime Down Solar Park. The viewpoints are yet to be agreed with Wiltshire Council, so any meaningful assessment of potential views, glare and glint are necessarily flawed or impossible. The PEIR confirms that the local	The applicant notes this comment. Viewpoints have been agreed with Wiltshire Council and the CNL Board and are included within the LVIA in ES Volume 1, Chapter 8: Landscape and Visual

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	<p>countryside, particularly 'Lime Down sites A to E' is characterised by a gentle rolling landscape with long views and few obstructions. It is very difficult to see how the gentle undulating landscape could accommodate solar panels (whether 2m or 4.5m high) and their associated landscaping/planting and BESS infrastructure, without being irrevocably changed and lost. The height of the installations is incompatible with local topography without the irredeemable loss of the characteristic 'Cotswold views and panorama. It has taken hundreds and possible thousands of years to create but could be lost within 2 years if this development is approved. The PEIR lacks detailed and meaningful information to address these areas of concern. These issues resonate very strongly with residents and visitors alike but are still unresolved. Therefore, permission for this development should be refused.</p>	<p>[EN010168/APP/6.1]. The layout of the Scheme has changed since the PEIR submission and panels have been removed from the Scheme where incompatible with the receiving landscape.</p> <p>A Glint and Glare assessment is included in ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3].</p>
Sherston Parish Council	<p>"Landscape and visual (e.g. local viewpoints particularly important to you)</p> <p>The Cotswolds is one of the UK's most treasured landscapes, attracting visitors from around the world. Towering panels, industrial structures, and fencing will destroy unspoiled countryside views, replacing them with an industrial wasteland. During the Covid period, many people travelled from the likes of Bath and Bristol to enjoy the landscape. If this type of facility was not available or restricted in terms of walkers feeling herded through local fields with 4.5m solar panels either side surely it would impact their mental health, presumably one of the reasons they walk. There is a daily influx of walkers/ramblers visiting the village to enjoy the local walks, these visitors also contribute to the local economy spending money in cafes, pubs and local shops.</p> <p>The view of the panels all along the Fosse way will not be obscured for some time if ever, given the proposed height of the panels. You mention planting screening; what screening will grow at a rate to obscure the view? If the proposed planting is deciduous (which it should be) the panels will still be visible from Autumn to Spring. Not</p>	<p>The applicant notes this comment.</p> <p>Although the Site is not within the CNL (AONB), it has been agreed that areas of Sites A, B and C are within the setting of the CNL. The scheme has been informed by the Mitigation Hierarchy to prevent/avoid, mitigate and restore and enhance to avoid significant adverse impacts on the CNL's landscape and visual character and quality.</p> <p>The LVIA includes an assessment of effects on all footpaths and bridleways. Those where significant effects have been identified are fully assessed in ES Volume 3, Appendix 8.3 ES LVIA Assessment Sheets [EN010168/APP/6.3] and the Cumulative Visual Assessment assess sequential views from publicised routes such as the Fosse Way.</p>

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	withstanding that we are concerned that the rotating nature of the solar panels (even if it's a proportion of them) will cause glint and glare for road users (cars, lorries, vans, cyclists, motorcyclists) possibly resulting in accidents to loss of visibility."	A Glint and Glare assessment is included in ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3] .
Sherston Parish Council	<p>"Q7. Please tell us what you think about our assessment of the potential effects the Project could have on the landscape and views, and the measures we are proposing to reduce those impacts. For example, siting of equipment, conservation of existing vegetation, additional tree and hedgerow planting</p> <p>RESPONSE:- We think the development will have a very negative impact on the landscape; the cumulative impact of so many fields containing solar panels, sub-stations and BESS will give the impression of being in an industrial zone. We do not believe that hedgerows will mitigate the presence of 4.5 metre high panels or the even higher sub-station infrastructure. The site is full of wide-open spaces, with views from and to the Cotswolds National Landscape. We are particularly concerned by Fields A1 and A11 (south of Sherston); these fields border the Cotswolds National Landscape (CNL). They should be removed from the scheme and at the very least should become a buffer zone to preserve the context of the CNL."</p>	<p>Panels in fields A11 and A12 on the boundary of the CNL have been removed. These areas have been retained within the red line boundary and used for positive enhancement.</p> <p>The LVIA has fully assessed the effects of the Scheme on the CNL and considers both views to and from the CNL, refer to ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].</p>
St Paul Malmesbury Without Parish Council	<p>"Visual Impact</p> <p>By virtue of the size of the panels being proposed, effective levels of screening are unlikely to be achieved in a reasonable timescale, if ever. The impact upon the landscape of this area will be adversely affected with the number visitors likely to fall which will impact the many small businesses that offer accommodation in Corston and Rodbourne. The landscape around the villages of Corston and Rodbourne will become a sea of panels. "</p>	Comment noted.
Wiltshire Council	3. The site abuts the Cotswolds National Landscape and views out from the landscape would be impacted. As such, the scale and	Panels on the boundary of the CNL have been removed to avoid harm to the CNL. These areas have been retained within the

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	cumulative impact of the site are relevant not just to local residents but also in relation to the protected landscape	red line boundary and used for positive enhancement.
Wiltshire Council	4. As it stands, not possible to come to a proper view on the proposals, since no cross sections, photomontages etc. Have been provided to show how the panels them selves will be seen from different viewpoints.	Cross sections and photomontages are provided in ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [EN010168/APP/6.2] .
Wiltshire Council	"9. Further to residents' amenity, the applicant accepts that there is no way to completely screen the solar site especially given its scale and the elevation of land on which it is based. Given the height of the solar panels, such screening would require the planning of fast growing, non-native trees to provide any screening which would itself be inappropriate in the setting of North Wiltshire. The inability to screen the site will result in substantial amenity harm and is a reason for refusal."	The Applicant accepts there are places within the Scheme where panels are difficult to screen due to the topography. In addition to the removal of panels in C2, C3 and C4, further panel removal has taken place in in Site C and along the Fosse Way for this reason. No non native trees are proposed within the Scheme.
Wiltshire Council	"Response Context: 7.1. This response primarily considers the information included within Chapter 8 (Landscape and Visual) of the PEIR. Comments are also provided on other chapters and information where landscape and visual matters are relevant. 7.2. It is noted that this statutory consultation phase remains within the pre-application stage of the DCO process. The following comments and observations are provided primarily to check whether the methodology and approach to the assessment of Landscape and Visual effects upon appropriately identified receptors is sufficient or sufficiently on course to enable informed planning judgement on the likely resulting significant landscape and visual effects arising from the project, including any significant cumulative landscape and visual effects that are considered likely to arise from the development proposals in combination with other existing and planned developments. "	Comment noted.
Wiltshire Council	"7.10. The council's Landscape Officer does not identify any obvious landscape or visual receptor omissions pertinent to the consideration of landscape and visual assessment, or issues with	Comment noted.

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	how this information is presented on the supporting maps. "	
Wiltshire Council	7.11. It is anticipated that additional maps will be incorporated into the Landscape and Visual chapter of the finally submitted ES, following the refinement of the detailed cable connection route in accordance with the identified design parameters for this project element.	Mapping of the refined cable corridor has been included into the Landscape and Visual chapter. The LVIA has included an assessment of landscape and visual effects on receptors within the refined 500m corridor.
Wiltshire Council	"Chapter 8 (Landscape and Visual):7.20. Chapter 8 (Landscape and Visual) presents the findings of the Environmental Impact Assessment (EIA) undertaken to date considering the landscape and visual impacts of the proposed scheme during the construction, operation (including maintenance) and decommissioning phases. The following aspects are identified to have been considered within the Landscape and Visual Impact Assessment (LVIA) process to inform the findings of this chapter to date (Jan 2025): • The existing landscape and visual baseline scenario within a defined Study Area, and the nature of change. • The effects upon landscape and visual receptors arising as a result of the Scheme and the significance associated with identified effects based on the sensitivity of these receptors to change and the magnitude of any change that will likely occur. It also defines whether an effect is beneficial, adverse, or neutral. • Embedded mitigation proposals established in response to design proposals to date and identified landscape and visual receptors. "	Comment noted.
Wiltshire Council	"7.21. The methodology states that it follows the advice contained within the 'Guidelines for Landscape and Visual Impact Assessment – Third Edition' (GLVIA3) and supporting LITGN-2024-01-GLVIA3 'Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment – Third Edition (GLVIA3). The council agrees that this referenced guidance alongside the other guidance listed under paragraph 1.11 of Volume 3, Appendix 8 is the appropriate guidance to establish the methodology relating to the assessment of likely significant	Comment noted.

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	landscape and visual effects including cumulative landscape and visual effects. "	
Wiltshire Council	<p>7.22. The following observations are provided in relation to the LVIA methodology as currently included at Appendix 8-1 (Volume 3) of the PEIR.</p> <p>7.23. Under the section heading 'Visual Baseline', paragraph 1.4.11 states: "Landscape character types (LCTs) are reviewed during fieldwork and the descriptions contained in the published landscape character assessment are augmented where necessary." The council considers that the extracted text relates to the landscape baseline methodology and not the visual baseline methodology.</p>	<p>This text in para 1.4.11 has been moved to the section on landscape baseline. Refer to ES volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1].</p>
Wiltshire Council	<p>7.24. There is no information included within the LVIA methodology which justifies or explains how the Zol for the cumulative landscape and visual assessment has been established. Further comments in relation to the LVIA's specific approach and methodology employed for the assessment of cumulative Landscape effects and cumulative Visual effects is included under comments for Chapter 6 (EIA Methodology) and Chapter 21 (Cumulative and In-Combination Assessment of Effects).</p>	<p>Following consultation with WC, the Cumulative Assessment within the LVIA Has been extended to a study area of 10km.</p> <p>The Methodology for the Cumulative Landscape Assessment has been reviewed to provide a clearer reference to cumulative effects on the Landscape Character Areas within the defined Study Areas.</p> <p>Additional mapping will be included in the LVIA to show existing solar schemes, the proposed LD Sites and short listed Cumulative Sites within the Study Areas and the Landscape Character Areas.</p> <p>ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.</p>

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Wiltshire Council	"Landscape Effects: 7.25. Following a preliminary review of the summary tables for likely landscape effects, as included within Appendix 8-3-1 (Volume 3) Landscape Assessment, it is noted that Table 1.1 [See page 17 of Technical Response PDF for Tabel 1.1] provides a summary of the landscape receptors assessed as part of the PEIR (extracted below) for potential significant effects to arise from the project. 7.26. The above table brings together the assessed cumulative site effects (Lime Down A to E) into a summary overview of the significance of landscape effects which are assessed at this stage for each of the receptors assessed for individual solar panel areas, which are included as separate tables for each area within Appendix 8-3-1. "	Comment noted.
Wiltshire Council	7.27. The applicant has assessed that the only likely significant effects considered to arise from the introduction of the totality of the scheme at this location are for the Landscape Fabric receptor, i.e. relating to cumulative consideration of landscape elements / components, for example trees, hedgerows, woodland, ponds etc. The assessment concludes that at Operation (year 15) there would be a moderate significant beneficial effect, following the establishment of mitigation and enhancement planting, and a moderate significant adverse effect upon the character of the Local Study Area (1km) at Construction phase and for Year 1 Operation phase, which progressively reduces to moderate minor adverse and not significant by Operation (year 15). No other significant adverse effects are otherwise anticipated for landscape receptors by the applicant. The council is not yet in a position to agree with this conclusion.	Comment noted.
Wiltshire Council	7.28. At this stage, and without the benefit of the detailed LVIA on the final scheme, the council's Landscape Officer is not yet in a position to agree that if appropriate new planting successfully establishes, and as it begins to mature, then the project (Lime Down areas A to E) could result in a moderate beneficial effect at year 15 Operation and Decommissioning phases of the project for the landscape fabric. This would very much depend on the final	Comment noted.

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	design of the scheme and its successful establishment and appropriate future management.	
Wiltshire Council	7.29. The only other significant effect identified by the applicant in Chapter 8 is for the landscape character of the Local Study Area. The council has considered the supporting landscape assessment sheets of the PEIR, which in the council's Landscape Officer's opinion seem to rely upon the embedded mitigation design parameters in all cases, including buffers and standoffs to sensitive visual receptors alongside new mitigating planting to screen development areas and improve visual integration of the solar panel areas in order to reduce this moderate significant adverse effect assessed at year 1 Operation, to a moderate / minor adverse (not significant) effect at Year 15 Operation for the baseline character of the Local Study Area including all site areas (Lime Down A to E).	Comment noted.
Wiltshire Council	7.30. It is the council's Landscape Officer's opinion that the applicant's preliminary consideration of likely resulting significant effects arising from the development proposal has only superficially evidenced the consideration of the resulting change effects upon the existing landscape character baseline. The significance of resulting effect upon the Local Study Area (landscape character) is a measure of resulting change arising from the introduction of the development proposal into the existing landscape baseline situation, in this case, the Local Study Area equates to the character of the site areas (Lime Down A to E) and their immediate adjoining landscape context.	The LVIA fully assess the landscape effects of the Scheme (Sites A-E and the cable corridor) on the relevant landscape character areas within the different Study Areas.
Wiltshire Council	7.31. The provisional assessment of likely significant effects upon landscape character doesn't appear to consider or reference the scale (land area cover) of the development proposal or corresponding land use change, or how the introduction of new urbanising solar scheme elements including 100's of hectares of solar panel strings, 2 substations and up to 2 Battery Energy Storage System (BESS) facilities into the receiving local landscape (character) baseline alter this. The provisional assessment of landscape character seems to focus on retention and enhancement	<p>The LVIA in the ES fully assess the landscape effects of the Scheme (Sites A-E and the cable corridor) on the relevant landscape character areas within the different Study Areas.</p> <p>All mitigation measures are considered embedded as set out in the LVIA, refer to ES volume 1: Chapter 8 Landscape and</p>

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	of physical perimeter site landscaping components (landscape fabric which is assessed separately), while in other areas of the PEIR, it states that additional enhancement measures are not relevant to the assessment of overall significance.	Visual [EN010168/APP/6.1]. At PEIR, no additional mitigation measures were proposed to reduce Residual effects.
Wiltshire Council	7.32. The magnitude of change to character seems to acknowledge the qualitative elements of the landscape, but not the quantitative change from new introductions, or how these fit with the existing character to maintain the baseline condition. The character of the existing landscape baseline will be substantially changed from that of existing farmed fields and seasonal farming activities functioning to providing greenfield separating countryside between distinctive rural limestone villages and farmsteads to extremely large, albeit disaggregated areas of new urbanising solar energy infrastructure. These effects are in theory fully reversible, but will be of long-term duration. They will endure for the proposed life of development and visual mitigation measures, combined with landscape enhancement planting would not in the council's Landscape Officer's opinion substantially alter this state of significance from Operational Year 1 to Operational Year 15 in terms of character.	Comment noted.
Wiltshire Council	"Visual Effects: 7.33. It is noted that the initial assessment of visual receptors is evidenced by numerous visual assessment sheets included within Appendix 8, including assessments of Private receptors at Appendix 3-2-1; Transport receptors at Appendix 3-2-2 and public receptors at Appendix 3-2-3. Those visual receptors assessed likely to experience significant visual effects are scoped in to be taken forward for final visual assessment and inclusion within the ES to be submitted with the DCO application. The council's Landscape Officer does not identify any additional public visual receptors or raise any issues in this regard. "	Comment noted.
Wiltshire Council	"7.34. The proposed public viewpoint locations to be taken forward for visual assessment are included within Chapter 8 and listed at Table 8-7 (Proposed Viewpoint Locations), which is supported by Figures 8-10 (viewpoint location maps) and Figures 8-10-1 to 8-10-5 (viewpoint location maps of individual site areas A to E) and	Comment noted.

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	Figures 8-14-1 to 8-14-57 (Viewpoint Baseline Photography and Accurate Visual Representation (AVR) Level 1 photomontages) in Volume 3 of the PEIR."	
Wiltshire Council	7.35. The viewpoint locations have been subject to consultation and agreement with the council's Landscape Officer and the Cotswolds National Landscape (CNL). Additional viewpoints have been requested by Wiltshire Council and CNL representatives during consultation on this matter, and the PEIR confirms these have been or will be additionally included. Therefore, the council's Landscape Officer does not identify any additional visual receptors or viewpoints (including longer distance) which would be necessary to additionally include to provide a proportionate assessment of likely significant visual effects arising from the proposed development.	Comment noted.
Wiltshire Council	"7.36. A series of AVR Level 1 photomontages have been produced to show the effects of the scheme at locations where significant visual effects are considered likely to occur. The locations of the photomontages have been agreed with the Cotswolds National Landscape Board (CNLB) and Wiltshire Council's Landscape Officer. It is understood that the summer Viewpoint photography for the additionally requested photomontage viewpoint locations requested by the CNLB and Wiltshire Council could not be undertaken in time for inclusion in this report. However, it is understood that both winter and summer photography will be included in the final ES. "	Comment noted.
Wiltshire Council	7.37. The council welcomes that the final ES submission will include AVR Level 3 photomontages (which include details such as materials, textures and colour) in both winter and summer months from a number of these Viewpoints, which will be finally agreed with CNLB and Wiltshire Council alongside cumulative photography where the effects of the Scheme would be seen in combination with other Development . 7.38. Therefore, the council's Landscape Officer does not raise any specific issues in relation to the visual assessment methodology as currently outlined within Chapter 8 of the PEIR at this stage. It should enable the preparation of a proportionate and transparent	Comment noted.

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	visual assessment as part of the LVIA to be carried out for the final DCO scheme.	
Wiltshire Council	" <u>Embedded Mitigation Measures:</u> 7.39. The PEIR identifies embedded mitigation measures as a design response to date, seeking to avoid, reduce, and compensate for significant adverse landscape and visual effects resulting from the proposed development. "	Comment noted.
Wiltshire Council	7.41. It is the council's Landscape Officer's view that some additional field areas, currently illustrated as panel areas within site layout drawings, should be removed to provide further embedded mitigation for the final scheme. Obvious examples are considered to be the land located in the northwest corner of Lime Down C due to the rising sloping and open nature of the topography viewed by receptors located within the CNL, and which could be considered as complimentary landscape to the CNL designation, and rising field(s) to the north of Lime Down E, which are visible from the edges of Corston and which shares some potential for a cumulative visual effect with the existing operational Rodbourne Rail Solar farm from elevated vantage points.	It is recognised that Site A, B and C or parts thereof are within the setting of the CNL. Consultation with the Cotswolds National Landscape Board have led to the removal of panels in Sites A, B and C to avoid harm to the National Landscape. Many of these fields remain in the Scheme and used to provide positive enhancement.
Wiltshire Council	"Additional Enhancement Measures: 7.42. It is understood that the applicant has requested feedback in relation to the nature and type of landscape enhancement measures suitable for the project to seek to deliver. The council has identified the following measures as a starting point for further project team / stakeholder engagement: • In areas that are considered to comprise the setting to the CNL, or adjacent areas that can be considered as 'complimentary' landscapes to the CNL, mitigation measures and enhancements should support the delivery of policies contained within the 'Cotswolds National Landscape (AONB) Management Plan' which can be further detailed and informed on a landscape character area basis by following advice contained within the 'Cotswolds National Landscape (AONB) Landscape Strategy and Guidelines' and other relevant guidance."	The applicant notes this comment.

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Wiltshire Council	" •Enhancement planting and future management objectives in all areas should be generally aligned to support the delivery of the 'Wiltshire and Swindon Nature Recovery Strategy' (this is currently of draft status, but likely to be 21adopted prior to DCO submission), Wiltshire Green and Blue Infrastructure Strategy, and supportive of landscape management recommendations for specific landscape character types and areas identified within the hierarchy of published Landscape Character Assessments as identified within the scoping opinion, including environmental opportunities identified within the National Character Area Profiles. "	The applicant notes this comment.
Wiltshire Council	• The construction of new, maintenance and repair of existing dry-stone walls. (Note: avoid new hedgerow planting adjacent to existing drystone walls).	The applicant notes this comment.
Wiltshire Council	• Replacement of existing stiles with access for all gates along the rural public rights of way network. • Introduction of permissive or dedicated paths through or linking site areas to offer alternative attractive recreational routes, or create new circular recreational routes or linking connections, where this is compatible with ecology / biodiversity objectives.	The applicant notes this comment.
Wiltshire Council	7.53. Having visited the locations of the Lime Down Areas A-E scheme to ground truth a number of representative visual receptors and representative viewpoints used within the visual assessment, both independently and accompanied with the applicant's appointed landscape consultant, it is the council's Landscape Officer's opinion that there is likely limited potential for substantial levels of shared intervisibility between the separate Lime Down (A to E) site areas from representative viewpoints. However, this requires further work.	Comment noted.
Wiltshire Council	7.55. The approach to assessment of cumulative landscape effects in relation to landscape character (in particular the 'Limestone Lowland Type' and its associated 'Landscape Character Areas') are not in the council's Landscape Officer's opinion being appropriately considered but need to be.	ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] fully assess the landscape effects of the Scheme (Sites A-E and the cable corridor) on the relevant landscape character areas within the different Study Areas.

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Wiltshire Council	7.56. There is an evident spatial clustering of existing, proposed and planned large-scale solar PV development and BESS feeding into Minety, Chippenham and Melksham substations in this area of Wiltshire, and in particular within this character type. This is incrementally and progressively significant changing the landscape character baseline due to the magnitude of change effects associated with this type of development which should be factored into susceptibility judgements for this additional NSIP project in the same character type and area.	Comment noted.
Wiltshire Council	7.57. The cumulative landscape assessment should illustrate graphically the application boundary extents of all existing large scale operational solar farms and BESS, those in receipt of planning consent pending construction, and those currently in planning awaiting determination within a clearly reasoned and justified Zol for this purpose to help understand the extent of their coverage on the baseline Landscape Character Type and Area(s).	The applicant notes this comment. Additional mapping has been included in the LVIA to show existing solar schemes, the proposed LD Sites and short listed Cumulative renewable Developments within the Study Areas and the Landscape Character Areas. ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1] assesses the Cumulative interactions for all technical disciplines.
Wiltshire Council	"DCO Conditions / Requirements: 7.58. At this initial stage, the council requests that the following heads of terms of DCO requirements are included for council approval: 1. Provision of detailed landscaping proposals 2. Implementation of landscaping proposals (including replacement of planting failures during early years establishment 3. Maintenance of landscaping (for duration of project) 4. Tree protection plans and arboricultural method statements for both construction and decommissioning phases 5. Landscape and Ecological Management Plan (LEMP) 6. Decommissioning and Land Restoration Plan"	Comment noted.
Wiltshire Council	c) The exact detailed landscaping proposals, including all embedded mitigation and enhancement measures.	This has been set out within ES Volume 1, Chapter 8: Landscape and Visual

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		[EN010168/APP/6.1], ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [EN010168/APP/6.2], and the Outline Landscape and Ecological Management Plan [EN010168/APP/7.18].
Wiltshire Council	<p>"b) Completion of a detailed Landscape and Visual Impact Assessment (LVIA) in respect of the final scheme. The LVIA should of course take account of committed development of relevant types and, most particularly, the cumulative impacts of existing and permitted solar PV development.</p> <p>c) Production of Level 3 AVR photomontages for both winter and summer months from all relevant viewpoints for agreement with the CNLB and Wiltshire Council.</p> <p>"</p>	The applicant notes this comment. This has been set out within ES Chapter 8: Landscape and Visual [EN010168/APP/6.1].
Wiltshire Council	3. The detailed design for landscaping, including its specification, to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase.	Comment noted.
Wiltshire Council	<p>"Management Plans:</p> <p>9. A Landscape and Ecological Management Plan (LEMP) is to be submitted to and agreed by the Local Planning Authority prior to the commencement of the construction phase. This will include obligations on the applicant for the implementation of landscaping proposals (including the replacement of planting failures during early years establishment) and maintenance of landscaping for the duration of the scheme. This plan is to include suitable monitoring measures to assess compliance, including appropriate remediation measures."</p>	An Outline Landscape and Ecological Management Plan (LEMP) has been prepared and is available in DCO Volume 7 [EN010168/APP/7.18].
Brokenborough Parish Council	<p>"Visual Impact</p> <p>The Cotswolds is renowned for its unspoiled landscapes, attracting visitors worldwide. The installation of towering panels, industrial structures, and fencing would destroy these cherished views, replacing them with an industrial wasteland. "</p>	The LVIA has considered the effects of the Scheme on all landscape and Visual receptors within the CNL. Refer to ES Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1]. The effects on the Special Qualities of the Cotswold National Landscape are also assessed. Refer to ES Volume 3: Appendix 8.6

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		Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3].
Chippenham Without Parish Council / Dauntsey Parish Council / Kington St Michael Parish Council / Langley Burrell Without Parish Council / Seagry Parish Council	In regards to landscape impacts, the Council is concerned about the visual impact created by such a vast sprawl of solar panels across a substantial geographical area. As it stands there is a lack of detail and clarity on how zones of influence for the cumulative impact assessment has been devised and on the assessment's methodology, resulting in the scope for the assessment being considered insufficient for cumulative assessment of landscape and visual effects.	The Cumulative Methodology is explained in the LVIA. Refer to ES Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1] and is set out in ES Volume 3: Appendix 8-1: LVIA Methodology [EN010168/APP/6.3] . A Technical Note has also been issued to Wiltshire County Council.
Hullavington Parish Council	There appears to be no verified visual montages (VVMs) that assess this new potential installation.	Verified Photomontages from agreed Viewpoints are included in the ES. Refer to Volume 2: Baseline photography and Photomontage [EN010168/APP/6.2]
Yatton Keynell Parish Council	Whilst the panel areas lie outside the Cotswold National Landscape (CNL), they are close to the boundary and therefore the visual impairment looking both from and towards the CNL is highly significant.	The LVIA has considered the effects of the Scheme on all landscape and visual receptors within the CNL. Refer to ES Volume 1, Chapter 8 Landscape and Visual [EN010168/APP/6.1] . The effects on the Special Qualities of the Cotswold National Landscape are also assessed. Refer to ES Volume 3, Appendix 8-6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3] . A detailed assessment of the likely significance of effects from the Scheme on the use and desirability individual PROWs, tourism destinations such as the Cotswold National Landscape and Badminton Horse Trials, and the economic impact to the tourism economy has been included in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation

Council Name	Feedback	LVIA Response
		<p>[EN010168/APP/6.1] and ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [EN010168/APP/6.3].</p> <p>This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability – impacts on tourism and visitor destinations and events, and the potential impact on tourism-dependent businesses in the areas immediately impacted by the Scheme. The impact on the agricultural economy and food production as a result of the Scheme, or cumulative solar schemes in Wiltshire are not significant in comparison to the current quantum of land in arable and food production use. While the Applicant team is aware of food security as a national concern, government policy does not set out that food security matters are of greater importance than current low-carbon / net zero energy security requirements. As such, these have not been assessed as likely significant effects to socio-economics or human health. Impacts on mental health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]. This includes specific assessment of the impact of the Scheme on community identity and culture, and the likely mental health impacts of changes to these. Priority has been given in the assessment to the communities most immediately affected by changes to their visual and landscape setting. The</p>

Council Name	Feedback	LVIA Response
		assessment of likely accommodation need for temporary inbound workers has been set out in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] . This assessment finds that there is sufficient usually vacant accommodation space (both in serviced accommodation or in vacant private rental spaces) within the 20km Study Area to accommodate temporary inbound workers without affecting usual visitors or placing additional demand on the rental accommodation market.
Yatton Keynell Parish Council	This area of the CNL is defined as Dip Slope Lowland and the characteristics equally apply to the adjoining land. These characteristics will be lost by the industrialisation of the landscape with vast areas of monochrome solar panels and associated infrastructure.	Agreed- The CNL is defined as Dip Slope Lowland. The effects of the scheme are assessed in the LVIA. Refer to ES Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1] . The effects on the Special Qualities of the Cotswold National Landscape are also assessed. Refer to ES Volume 3, Appendix 8-6: Assessment of Effects on the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3] .
Yatton Keynell Parish Council	The need to screen these structures (which for the larger 4.5m high structures is highly doubtful) will fundamentally change the characteristics of the area renowned for its scenic beauty and therefore popular with tourists whose patronage supports and sustains a range of local leisure related businesses. No thought has been given by IGP to the potential for long lasting damage to the local economy should Lime Down be developed.	Comment noted. The effects of the scheme are assessed in the LVIA. Refer to ES Volume 1: Chapter 8 Landscape and Visual [EN010168/APP/6.1] .
Wiltshire Council	"7.3. It is acknowledged that the survey, assessment and preliminary design of solar panel areas A to E are further advanced at this stage of the NSIP project in comparison to the cable route linking the separate panel areas to onsite substations and for the	Comment noted.

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	main cable connection to the point of grid connection. There is limited information provided for the actual cable routes within the PEIR information at this stage, so comments for this element of the project will be limited. However, it is agreed that the cable route connection element of the scheme is unlikely to generate much potential for likely significant landscape or visual effects if the mitigation hierarchy is followed, as no new overhead electricity transmission infrastructure is proposed as a design parameter, and the trenching work would be short duration and temporary in nature largely limited to construction phase effects. "	
Wiltshire Council	Plant new areas of mixed native broadleaf woodland or identify areas for natural regeneration of woodland in areas which would help deliver improved habitat connections. Consideration could also be given to introducing new field corner copses and trees as stepping stones to link with and extend existing areas of woodland and tree cover, where this would not lead to the loss of existing important scenic or heritage views or harm other existing valued habitat types or impact the buried archaeological resource.	Specific mitigation measures and enhancement plans are included in the ES. Refer to ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] . The measures are also described in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] .